

Supplemental Nutrition Assistance Program (SNAP)

(701) 328-2328

Fax (701) 328-1060

Toll Free 1-800-755-2716

Treasury Offset Program 1-800-491-5716

ND Relay TTY: 1-800-366-6888



Jack Dalrymple, Governor
Maggie D. Anderson, Executive Director

August 28, 2015

Ms. Jane Duffield, Chief
State Administration Branch
Program Accountability and Administration Division
Supplemental Nutrition Assistance Program
U.S. Department of Agriculture
Food and Nutrition Service
3101 Park Center Drive, Room 818
Alexandria, VA 22302

Dear Ms. Duffield:

As the individual completing the FNS 366B for the state of North Dakota, I am providing comments regarding Federal Register Notice Volume 80, #128, published on July 6, 2015 relative to the Food Program and Reporting System (FPRS) and the proposed changes to the FNS 366B.

The proposal reads in part "Form – FNS 366B lacks certain data elements that would increase its usefulness by providing more accurate information from State agencies on SNAP application timeliness, and on the types and impacts of fraud prevention activities in use. By collecting more accurate and useful data SNAP can target technical assistance to those state agencies that need the most significant improvements to their application and recipient integrity processes".

The data referred to in the notice is already being collected and reported to FNS. In addition, FNS is aware of which states are high performing and those states that require significant improvement. Rather than place an additional burden on those states who are accurately reporting, FNS should provide training and technical assistance to address the issues/concerns in those states identified as inaccurately reporting data. This responsibility should not be shifted to States.

The request for timeliness data proposed on the 366B would:

- be administratively burdensome;
- require extensive programming changes and costs to our 31 year old mainframe system;
- require IT staff resources which are in very short supply;
- require substantial tracking and reporting for our local county social service offices to ensure we receive the information needed to complete the 366B;
- implementation of policy related to prosecutions and tracking program dollars and days ; and,
- require completion of a training package for county social service staff to ensure they are reporting correctly.


The notice further states in part, "Based on the GAO report, RFI responses and results of ME's completed to date, it is apparent that state reporting lacks consistency and form FNS 366B data elements and instructions are not clearly defined".

As federal Program Access Reviews (PAR's) are now being completed on an annual basis which include timeliness of application processing and Recipient Integrity Reviews are also being conducted by FNS at the state level, the findings of these reviews should be used to assist those states performing poorly. High performing states should not be burdened with making significant reporting changes that will cost time and money when the outcome or results will be the same. How will the information/data you are seeking assist those states who are performing poorly?

Obtaining the suggested additional data of and by itself will not resolve the problem. The problem must be addressed and assistance provided where it is needed.

Thank you for the opportunity to provide comments.

Sincerely,


Deborah Kramer
EBT Coordinator

cc: Arlene Dura, SNAP Director