



WYOMING DEPARTMENT *of*
Family Services

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

Re: FNS 366B

Dear Ms. Duffield:

Thank you for the opportunity to provide comment with regard to the reporting of data on the FNS 366-B Report.

As a preface to the comments below, I'd like to address an important fact as it relates to the state of Wyoming. Please, keep in mind that Wyoming is one of the smallest populated states in the Union and one of the smallest in the issuance of SNAP benefits. However, Wyoming is also one of the largest states in the Union geographically. That being said, Wyoming performs a lot of tasks, but the activity with regard to those tasks is small in comparison to other states.

I offer the following comments on behalf of Wyoming:

- (a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information has practical utility.

While the information that is gathered on the 366b is helpful, we are not convinced that it is necessary in order to address the overall performance of the Fraud and Recovery Unit in the State of Wyoming. Other methods may be more insightful as to the costs associated in operating an investigative Unit. And there



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may be other contributing factors that play a role in the priorities of the investigative unit, from the state level.

Each investigative unit across the country concerned with public assistance fraud needs to determine the focus of their investigations based on the unique situations in their state or area. This focus also needs to balance the costs associated with the investigation and the ultimate return. The ultimate goal should be to return the tax payer dollars to the programs. How that is done is different in each state based on their own unique circumstances and the resources available. That can be a constant juggling act and hard to report accurate relative data.

Ultimately, it boils down to each state's perspective, focus and value that it places on protecting the integrity of their public assistance programs.

- (b) The accuracy of the agency's estimate of the burden hours, including the validity of the methodology and assumptions that were used.

No comment.

- (c) Ways to enhance the quality, utility and clarity of the information to be collected.

I'll address an issue of **clarity** in this section and offer the following:

The definition of *completed investigation* as indicated in (f) of Section E. Fraud Investigations is confusing. Investigations are often on-going once someone has left the program, and even after someone has passed away. The fraud "tip" is usually not presented until the person dies. Why would the investigation then cease at this point?

It appears to me that it is assumed the only investigations that are considered open, are those in which the public assistance case is still open. Once the case closes, we close our investigation? Doesn't make sense.

Also, there will be overlap in the way the completed investigation is being defined. How do states provide information on investigations that are still open outside of the reporting time lines for the 366b?



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In addition, in paragraph (f) of Section E, Fraud Investigations, the time allocated for investigations is not tracked on a case by case basis. Wyoming does have a cost allocation system which attributes the time spent on a particular activity and SNAP Fraud is one particular activity, but that system does not drill down to the specific investigative case level. The system just captures the overall time.

Next, is a comment about **quality**.

Using the guideline in Section E. Fraud Investigations, and more specifically (h), an FTE can be calculated, but that is only as accurate as the time associated with SNAP investigations is initially entered and/or captured.

Investigations that are being conducted may include other programs associated with the recipient. Time should be allocated for those programs too. The time attributed to the applicable program is left up to the interpretation of the person entering the time and human error can result. This data may not be 100% accurate.

- (d) Ways to minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical or other technological collection techniques or other forms of information technology.

As I indicated in my opening paragraph, Wyoming has a small population. From a technological perspective, the costs associated in creating the technology that could address the capturing of the data as requested on the 366b may be overly burdensome and not cost effective based on the overall numbers in Wyoming as compared to larger states where it may be determined to be cost effective.

Some of the data, which is not currently automated is calculated by hand, again because Wyoming is small. That leaves the possibility of human error.

I understand the difficulty in finding a system that will capture good data related to fraud in any public assistance program on a national level, because each state is unique. Each state has their own distinctive challenges that other states do not. It's like comparing apples and oranges.

That being said, I believe that the information being captured on the 366b could be good data, but it is not an overall reflection or gauge of what is going on in



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America with regard to SNAP fraud, be it eligibility or trafficking. There are too many other variables that play a part in the investigation and administration of the program.

Perhaps the 366b could be designed within an FNS region, rather than at a national level, but that's for another time.

Thank you for the opportunity to provide comment.

Sincerely,

A handwritten signature in cursive script, reading "Michele Rossetti", is positioned above the printed name.

Michele Rossetti, CWFI
Supervisor, Fraud & Recovery Unit