

Dear Florida Department of Children & Families:

Thank you for submitting comments to Federal Register listing FNS-2015-0018-0001, Agency Information Collection Activities; Proposals, Submissions, and Approvals: Food Program and Reporting System. This is a response from the Food and Nutrition Service (FNS) to your comments regarding burden hours and cost. All other relevant comments are addressed in the Supporting Statement for this Information Collection Request. The Supporting Statement will be publicly available upon approval by the Office of Management and Budget.

Comment: “If the apportionment methodology used for cost allocation is used to allocate the investigation costs and investigation FTE, will it also be acceptable for reporting the requested information on the FNS-366B? If so, this element can be provided with minimal additional effort. However, if using the current methodology this is not acceptable, it will be time consuming to develop and maintain needed data collection processes to be able to report cost and staffing relating to investigative functions for SNAP eligibility fraud vs. SNAP trafficking cases, with little practical utility to the department. Furthermore, it would be very cumbersome to account for vacancies and turnover during the reporting period using the FTE calculation method indicated in the instructions.”

FNS Response: FNS removed the proposed investigation cost and investigation FTE elements and replaced them with an element that captures only investigator hours dedicated to SNAP investigations. This more accurately captures the most critical and variable component of both cost and staffing. State agencies may base this total on the apportioned amount of total hours dedicated to SNAP.

Comment: “Is the calculation of the difference between the investigation start date and disposition date sufficient for reporting section E.(f) Average # Days per Investigation? If so, this element can be provided with minimal additional effort. However, if this is not the case and this element intends to require a detailed time and activity accounting by case worked, it would require significant reengineering of current case management systems. In addition, investigative FTE often work on multiple investigations during any particular day, so imposing such an additional administrative burden would reduce the productivity of our already insufficient investigative resources.”

FNS Response: This calculation is the time between the investigation referral date and the conclusion of the investigation, e.g. the day the case the investigation unit accepts the case and the day it is determined that there is sufficient evidence to refer the case for ADH.

Comment: “Automated systems certainly could reduce the burden of collecting and reporting this information; however, our state has neither the personnel nor the funding to be able to make the system changes that would be required to produce the specific information requested in this form.”

FNS Response: After carefully considering all comments for the FNS-366B revision, FNS included only information that is essential to monitoring efficiency and integrity in SNAP.

Thank you again for your submission,