

Dear Mr. Russell:

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 on behalf of the Michigan Department of Health and Human Services. 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: “[Re: Sec F(d)] The disqualification date is not contained in the same system as the investigation assignment date. This will be cumbersome to collect and will increase the burden hours beyond what was estimated.”

FNS Response: FNS removed this element from the proposed revision. The FNS-366B will not collect average length of administrative disqualification hearings.

Comment: “[Re: Sec F(g-i)] OIG’s investigative case management system does not track this information. It would be difficult and burdensome to obtain this information from the state department that handles administrative hearings and incorporate back into our system for calculation.”

FNS Response: FNS modified this element to capture only cases that have been referred for an administrative disqualification hearing and have not received a scheduled hearing date for more than 90 days. This information is critical for ensuring SNAP recipients receive due process and cases are adjudicated timely.

Comment: “[Re: Sec F(j)] OIG’s case management system does not track this information. It would be difficult and burdensome to obtain this information from the state department that handles administrative hearings and incorporate back into our system for calculation.”

FNS Response: FNS has not proposed changes to this element from the current form.

Comment: “[Re: Sec G(d)] The disqualification date is not contained in the same system as the investigation assignment date. This will be cumbersome to collect and will increase the burden hours beyond what was estimated.”

FNS Response: The intended timeframe for this element is from the day a case is referred for prosecution after an investigation, to the day the prosecution concludes. This information is necessary to provide a clearer picture of the unique environment of fraud activity in each State. FNS realizes that prosecutorial timeframes are often out the State agency’s control; however, the State agency is responsible for ensuring that proper actions are taken when SNAP-related prosecutions conclude. As such, State agencies must have the ability to track SNAP fraud activities throughout their lifecycle.

Comment: “Regarding the accuracy of the estimate of the burden hours According to the Reporting Burden Estimates in the federal register notice, the modified FNS-366B will take each agency either 35 hours (taken verbatim from text) to respond or 27 hours (7.3 responses per Respondent x 3.7 hours per response ≈ 27). Regardless of these different numbers, with the new requirements for formulating a cost savings and requiring the inclusion of data that traditionally has not been owned

by the department, it is expected that the burden hours will be significantly greater than what they were prior to this revision.”

FNS Response: FNS estimates that reporting data for this information collection request will require 35 hours of respondent staff time. This is an increase of 11 hours from the current information collection. Therefore, the burden included in this information collection request is 35 hours per response at one response annually. The burden estimate of 3.7 hours per 3266 responses is the for the burden package that contains the FNS-366B. This package includes all forms submitted via Food Programs Reporting System (FPRS).

Thank you again for your submission,