

Dear Mr. Kehmna:

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 New York State Office of Temporary and Disability Assistance. 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: “For locally administered states, these changes will impose much more of a reporting burden and will require a longer period and more resources to implement than it appears FNS is acknowledging.”

FNS Response: After carefully considering all comments, FNS believes this proposed FNS-366B revision collects only information that is essential to monitoring efficiency and integrity in SNAP. The burden estimate for the FNS-366B is 35 hours per response at one response annually.

Comment: “[Re: Sec E(f, g, h)] As a locally administered program, NYS does not currently have tracking capability for these new 366B data elements for each local district in the state. Given the realities of the fluctuations in resource levels at the local social services district level throughout a reporting period, we would question the costs of time and resources that would need to be devoted to developing such a reporting system when compared to the minimal usefulness of the simplistic data contained in the results.”

FNS Response: FNS removed the proposed investigation cost and investigation FTE elements and replaced it 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 currently use this information to calculate investigation unit budgets and SNAP administrative expense reimbursement. Reporting this information will result in minimal burden and is essential to provide context for State investigation data.

Thank you again for your submission,