



Food and
Nutrition
Service

1320 Braddock Place
Alexandria, VA
22314

December 19, 2023

Carrol Christian
President
United Council on Welfare Fraud
Post Office Box 164
Westmoreland, Kansas 66549

Dear President Christian:

Thank you for your comments in response to the 60-day notice regarding Office of Management and Budget (OMB) collection 0584-0064, Supplemental Nutrition Assistance Program (SNAP) Forms: Applications, Periodic Reporting, Notices.

In your comment, you cited computer matching requirements at 7 CFR 272.12 as a significant contributing factor to the burden. You mentioned that FNS is missing an opportunity to address the causal factor prohibiting Federal systems of records from being used efficiently. The Department appreciates this comment; however, these regulations are consistent with Federal statute at 5 U.S.C. 552a(p). An act of Congress is needed to amend these requirements.

Additionally, in your comment, you mentioned cost savings associated with the National Accuracy Clearinghouse (NAC) pilot due to Food and Nutrition Service (FNS) waivers, which allowed matching results to be considered verified upon receipt. As the pilot is an optional State-led initiative, it is not a Federal system of records subject to requirements of the Privacy Act. The nationwide NAC is a requirement of the 2018 Farm Bill and a Federal system of records. As a Federal system of records, all participating State agencies are required to adhere to computer matching requirements per 7 CFR 272.12 and the Privacy Act at 5 U.S.C. 552a(p). The Privacy Act requires States to independently verify information following a match, notify individuals when they are indicated in a match, and provide them with an opportunity to contest prior to taking any adverse action. An act of Congress is needed to amend these requirements.

Finally, you mentioned that the estimated burden does not consider the costs associated with using physical mail services and does not accurately account for the estimated time for households to read notices. As you noted in your comment, States have the option to send electronic notices to households in lieu of physical mail. FNS consulted with seven States as part of this information collection process and researched other sources related to client burden and could not find data to justify increasing the burden associated with client notices since many States automate this process.

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FNS will maintain the burden estimates for notices outlined in the 60-day notice but will continue to update these estimates as more recent or accurate data becomes available.

Thank you again for your comments.

Sincerely,

Catrina Kamau
Chief
Certification Policy Branch
Program Development Division