

Comment Analysis

FNS received one comment to the notice from one State agency.

Comment: Since FNS has timely Account Management Agent (AMA) issuance data from electronic benefit transfer (EBT) contractors, State agency reporting of the FNS-388 is no longer needed.

Response: AMA data does not include participation data, cash-out benefit data, or other alternative issuance data. While the AMA issuance data holds promise as a new and earlier source for the EBT estimate provided on the FNS-388, our ability to consistently and accurately estimate State level participation from it has not yet been demonstrated especially with differences between States. Additionally, it would not be able to mirror our more comprehensive FNS-388 system.

The AMA issuance data and FNS-388 EBT issuance data from a State should be essentially the same, with only very small differences. In the future, we can see the possibility of AMA data being used in the FNS-388 system. Importing AMA issuance data on a monthly or even daily basis into the FNS-388 information system in lieu of the current FNS-388 EBT issuance estimate would require modifications to several FNS data information and reporting systems and the reports that currently report, use, and analyze FNS-388 data. As data issues, funds, and resources permit, we will consider integrating the AMA issuance data into our FNS-388 participation and benefit data system to replace the FNS-388 EBT issuance estimates, but not the participation estimates. Until then, EBT issuance estimates will continue on the FNS-388.