

# PUBLIC SUBMISSION

<b>As of:</b> 5/6/26, 12:39 PM
<b>Received:</b> May 04, 2026
<b>Status:</b> Pending_Post
<b>Category:</b> Individual
<b>Tracking No.</b> mor-s7rp-ky6d
<b>Comments Due:</b> May 04, 2026
<b>Submission Type:</b> Web

**Docket:** FNS-2026-0135

Agency Information Collection Activities: Supplemental Nutrition Assistance Program: Requirement for Interstate Data Matching To Prevent Multiple Issuances

**Comment On:** FNS-2026-0135-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Supplemental Nutrition Assistance Program: Requirement for Interstate Data Matching to Prevent Multiple Issuances

**Document:** FNS-2026-0135-DRAFT-0004

Comment on FR Doc # 2026-04203

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

Comment 5/4/26 - FNS-2026-0135-0001

RE: Supplemental Nutrition Assistance Program: Requirement for Interstate Data Matching to Prevent Multiple Issuances

It is not evident that the estimated burden accounts for the security risks of the data matching program. The amassing of personal data on so many households will create a target for hackers and data miners seeking to commit fraud. The risk of data breach will disincentivize participation or could subject already-vulnerable families to scams. When private companies are responsible for a data breach, customers are often given free credit monitoring services or other compensation. What measures will state and federal governments take to minimize risk and/or to compensate persons whose data is compromised? Changing program eligibility requirements and requiring the use of a new system is likely to impose a heavy burden on state governments. The agency should take a measured approach by deferring implementation, so that states can plan for the cost of implementation, or granting temporary waivers for implementation and compliance.

It is not evident that the projected savings from reducing "multiple issuances" would justify the cost of implementation. The agency should assess whether there is sufficient return on investment to justify the rule change. Perhaps the data checking could be implemented through future system upgrades more efficiently, or by a system that integrates with existing state systems to reduce the burden on state governments.

# PUBLIC SUBMISSION

<b>As of:</b> 5/8/26, 9:16 AM
<b>Received:</b> May 04, 2026
<b>Status:</b> Pending_Post
<b>Tracking No.</b> mor-mo01-45xa
<b>Comments Due:</b> May 04, 2026
<b>Submission Type:</b> Web

**Docket:** FNS-2026-0135

Agency Information Collection Activities: Supplemental Nutrition Assistance Program: Requirement for Interstate Data Matching To Prevent Multiple Issuances

**Comment On:** FNS-2026-0135-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Supplemental Nutrition Assistance Program: Requirement for Interstate Data Matching to Prevent Multiple Issuances

**Document:** FNS-2026-0135-DRAFT-0003

Comment on FR Doc # 2026-04203

---

## Submitter Information

**Organization:** Data Foundation

---

## General Comment

Data Foundation's Center for Data Policy Senior Director, Amanda Cash, DrPH, MPH comment expressing support for SNAP program integrity measures and providing suggestions to reduce the administrative burden for state public assistance agencies -- see attached.

---

## Attachments

05.04.26 - SNAP Requirement for Interstate Data Matching



Data Foundation  
1100 13th Street NW  
Suite 800  
Washington, DC 20005

202.964.1120  
info@datafoundation.org  
datafoundation.org  
Data Foundation

May 4, 2026

Food and Nutrition Service,  
U.S. Department of Agriculture  
Attention: SAB Branch Chief  
1320 Braddock Place,  
Alexandria, VA 22314

**Re: Supplemental Nutrition Assistance Program - Requirement for Interstate Data Matching to Prevent Multiple Issuances**  
(Docket 25-045 | FR Doc. 2026-04203)

Dear Mr. Penn,

We appreciate the opportunity to comment on the revised information collection request pertaining to the National Accuracy Clearinghouse (NAC), as published in the Federal Register on March 3, 2026.

In recent years, the Data Foundation has conducted extensive work on access to and the use of administrative data sources to strengthen program integrity and reduce improper payments across federal programs. In March 2026, we published [Program Integrity Through Data Infrastructure: Options for Reducing Improper Payments](#), a report that presents ten ranked policy options for reducing improper payments through enhanced data infrastructure, modernized verification systems, and strengthened interagency coordination as a starting point for programs and decisionmakers. This report includes considerations on bolstering SNAP eligibility verification while reducing the administrative burden for State Public Assistance Agencies (SPAAs) and recipients.

We thoroughly appreciate FNS' comprehensive update on the expected burden based on evaluation of the state programs that have already implemented the NAC. We do want to highlight that while the NAC has the potential to be a valuable tool in preventing duplicate payments, and ultimately alleviating administrative burden through automated matches, as it stands, its implementation increases the overall administrative burden for SPAAs. The NAC is only aimed at preventing duplicate payments, and does not offer the same matching capabilities as other tools, like the Public Assistance Reporting Information System (PARIS) or the Treasury's Do Not Pay Working System. The estimated burden for SPAAs is *in addition to* the current burden in checking other systems for a Veterans Administration (VA) Match (cross-referencing VA compensation and benefits) or verification against other databases.

*RE: SNAP Requirement for Interstate Data Matching*

We understand that this may be outside the current scope of implementation for the NAC, but we do hope that FNS will consider opportunities to further integrate the NAC with existing tools, like PARIS or DNP, to reduce duplicative querying and consolidate the overall administrative burden on SPAAAs. A more unified matching infrastructure would allow State agencies to conduct eligibility verifications through fewer separate systems and processes, ultimately strengthening SNAP's efficiency without adding to the workload of already resource-constrained agencies.

We appreciate FNS' commitment to reducing improper payments and look forward to seeing continued progress in this area. The Data Foundation supports this effort and would welcome the opportunity to engage with FNS on pathways toward greater system integration.

Thank you for the opportunity to comment on this initiative.

Sincerely,

Amanda Cash, DrPH, MPH  
Senior Director, Center for Data Policy  
Data Foundation

#### **About the Data Foundation**

The Data Foundation is a non-profit organization based in Washington, D.C. that champions the use of open data and evidence-informed public policy to make society better for everyone. As a nonpartisan think tank, we conduct research, collaborative thought leadership, and advocacy programs that advance practical policies for the creation and use of accessible, trustworthy data. Our activities proactively address emerging data-related needs in the country with the goal of devising realistic solutions, accelerating policy coordination, and advancing innovation. The Data Foundation is recognized by Candid Guidestar with the Platinum Seal of Transparency and received 4-Stars from Charity Navigator. To learn more, visit [www.datafoundation.org](http://www.datafoundation.org). (LEI: 254900I43CTC59RFW495)

# PUBLIC SUBMISSION

<b>As of:</b> 5/6/26, 12:39 PM
<b>Received:</b> May 04, 2026
<b>Status:</b> Pending_Post
<b>Category:</b> Academic
<b>Tracking No.</b> mor-wzsk-joyf
<b>Comments Due:</b> May 04, 2026
<b>Submission Type:</b> Web

**Docket:** FNS-2026-0135

Agency Information Collection Activities: Supplemental Nutrition Assistance Program: Requirement for Interstate Data Matching To Prevent Multiple Issuances

**Comment On:** FNS-2026-0135-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Supplemental Nutrition Assistance Program: Requirement for Interstate Data Matching to Prevent Multiple Issuances

**Document:** FNS-2026-0135-DRAFT-0005

Comment on FR Doc # 2026-04203

---

## Submitter Information

**Email:** andrew@cooperativepolicy.org

**Organization:** Main Street Foundation Center for Regulatory Analysis and Engagement

---

## General Comment

Attached are comments of the Main Street Foundation Center for Regulatory Analysis and Engagement.

---

## Attachments

MSF CRAE USDA FNS Comments SNAP State Reporting ICR FINAL 050426



## MEMORANDUM

**To:** Hon. Brooke Rollins, Secretary, US Department of Agriculture  
Hon. Patrick Penn, Acting Administrator, US Food and Nutrition Service  
**From:** Andrew Langer, President, Main Street Foundation

**Date:** May 4, 2026

**Re:** Comments on the United States Department of Agriculture Food and Nutrition Service Information Collection Request, “Proposals, Submissions, and Approvals: Supplemental Nutrition Assistance Program: Requirement for Interstate Data Matching to Prevent Multiple Issuances,” Docket FNS-2026-0135, Fed. Reg. 2026-04203, Published March 3, 2026

---

Below are comments of the Main Street Foundation’s Center for Regulatory Analysis and Engagement (CRAE) in response to the United States Department of Agriculture Food and Nutrition Service Information Collection Request, “Proposals, Submissions, and Approvals: Supplemental Nutrition Assistance Program: Requirement for Interstate Data Matching to Prevent Multiple Issuances,” Docket FNS-2026-0135, Fed. Reg. 2026-04203, published March 3, 2026.

CRAE is a project of the Main Street Foundation, a recently-formed non-profit, non-partisan 501(c)(3) research and education foundation. Our mission is to bring a disciplined, common-sense perspective to the regulatory process, one grounded in real-world experience, sound science, and rigorous economic analysis. We work to ensure that the costs, risks, and benefits of regulatory proposals are evaluated transparently and accurately, and that the voices, interests, and freedoms of Americans, particularly small businesses and working families, are meaningfully represented in regulatory debates. Above all, we focus on outcomes: regulations should address real problems, function effectively in practice, and improve conditions on the ground—not exacerbate the challenges they are intended to solve.

---

## **INTRODUCTION**

The Center for Regulatory Analysis and Engagement (CRAE), a project of the Main Street Foundation, appreciates the opportunity to comment on the U.S. Department of Agriculture’s Food and Nutrition Service (FNS) Information Collection Request regarding the National Accuracy Clearinghouse (NAC). Our mission is to inject a common-sense perspective into the regulatory process, ensuring that regulatory decisions are grounded in sound economic and analytical principles and that the voices of Americans—especially small businesses, state partners, and working families—are fully represented. We focus in particular on whether regulatory and administrative proposals address real problems in a manner that is disciplined, proportionate, and capable of improving outcomes without creating new inefficiencies or unintended consequences.

This proposed information collection sits at the intersection of program integrity and administrative execution within the Supplemental Nutrition Assistance Program (SNAP). CRAE strongly supports efforts to combat fraud, waste, and abuse in federal programs, including the prevention of duplicate SNAP benefit issuance across state lines. At the same time, the Paperwork Reduction Act (PRA) requires that such efforts be implemented with careful attention to necessity, burden, and practical utility. While the NAC framework is directionally sound, the current ICR raises significant concerns regarding burden calibration, methodological assumptions, and the risk of administrative over-expansion relative to measurable program integrity gains.

---

## **EXECUTIVE SUMMARY**

CRAE supports the objective of strengthening SNAP program integrity through improved interstate data matching. Duplicate participation undermines both fiscal stewardship and public confidence in the program, and a well-designed data system can play an important role in deterring and detecting improper payments. The NAC represents a meaningful step in that direction, particularly to the extent that it creates a consistent framework for identifying overlapping participation across jurisdictions.

However, the revised information collection reflects a substantial expansion in estimated burden—most notably in the volume of required queries and associated administrative actions—without a commensurate demonstration of incremental utility. The PRA requires agencies to ensure that information collection is not only well-intentioned but proportionate and efficient. In this case, the scale of the projected burden, the reliance on limited data to generate national estimates, and the layering of new administrative processes onto existing state systems suggest the need for refinement. Effective fraud prevention depends not on maximizing activity, but on optimizing accuracy, efficiency, and system design.

## **I. POLICY CONTEXT: FRAUD PREVENTION AND PROGRAM INTEGRITY**

Efforts to prevent duplicate SNAP participation are both necessary and appropriate. Interstate duplication represents a clear form of improper payment that can undermine the credibility of the program and divert resources from eligible households. Strengthening safeguards against such outcomes not only protects taxpayer dollars but also reinforces public trust in SNAP as a well-administered and accountable program. Moreover, the existence of robust verification mechanisms can serve a deterrent function, discouraging individuals from attempting to access benefits improperly in multiple jurisdictions.

At the same time, the design of fraud prevention systems must be carefully calibrated. Systems that are overly complex, administratively burdensome, or insufficiently precise can impose significant costs on state agencies while yielding limited incremental benefit. In some cases, poorly calibrated systems may even introduce new inefficiencies, slow benefit delivery, or create barriers for eligible participants. The central challenge, therefore, is not whether to pursue program integrity, but how to do so in a manner that is disciplined, targeted, and consistent with the PRA's emphasis on proportionality and practical utility.

---

## **II. PRA ANALYSIS: NECESSITY AND PRACTICAL UTILITY**

The NAC, as a concept, satisfies the basic threshold of necessity. Interstate data matching is a logical and statutorily grounded approach to addressing duplicate participation, and the collection of certain data elements is required to operationalize that system. However, the PRA requires a more granular inquiry: whether each component of the proposed information collection is necessary for the proper performance of agency functions. In this respect, the current ICR does not clearly distinguish between essential system requirements and expanded data collection or process steps that may offer diminishing returns.

Practical utility must also be evaluated in terms of outcomes, not just activity. The substantial increase in estimated query volume suggests a system that will generate a high level of administrative interaction, but FNS does not sufficiently demonstrate how this increase translates into improved detection or prevention of duplicate benefits. A system that generates millions of queries annually must be evaluated on its ability to produce accurate, actionable matches. Without clear evidence that expanded querying materially improves outcomes, there is a risk that the system will impose significant administrative burden without delivering proportionate gains in program integrity.

---

## **III. BURDEN ESTIMATION AND CALIBRATION**

The most striking feature of the revised ICR is the scale of the projected burden, particularly with respect to ongoing query activity. The estimate of over one million annual burden hours associated with NAC queries represents a dramatic increase from prior assumptions and reflects a broad expansion of when and how queries are required. While FNS attributes this increase to more comprehensive data and updated methodology, the underlying assumptions warrant closer scrutiny.

The revised estimates rely heavily on data from a limited subset of states that have fully implemented the NAC, extrapolated across all state agencies. While such an approach is understandable in the absence of complete national data, it introduces significant uncertainty. States vary widely in terms of caseload composition, administrative processes, and system integration. Applying a uniform query volume assumption across all jurisdictions risks overstating or mischaracterizing actual burden in many cases. This is a familiar pattern in regulatory analysis, where initial estimates fail to fully capture real-world variation and operational complexity.

More fundamentally, the PRA requires a clear relationship between burden and utility. The question is not simply whether the system can support a higher volume of queries, but whether those additional queries meaningfully improve outcomes. A system that requires queries at every application, recertification, and household change event may generate substantial activity, but if the incremental detection rate of duplicate participation is low, the burden may not be justified. This suggests the need for a more calibrated, risk-based approach to querying that focuses resources where they are most likely to yield results.

---

#### **IV. ADMINISTRATIVE BURDEN ON STATE AGENCIES**

The implementation and operation of the NAC impose significant responsibilities on state agencies, both in terms of system development and ongoing administration. The estimated 36-week timeline for system setup underscores the complexity of integrating NAC requirements into existing eligibility and case management systems. This is not a trivial undertaking; it involves not only technical development but also process redesign, staff training, and coordination across multiple functional areas.

Once implemented, the NAC introduces a continuous stream of administrative obligations, including daily caseload uploads, real-time querying, match verification, and notice issuance. These activities represent an ongoing operational burden that must be absorbed within already constrained administrative environments. State agencies are responsible for managing large caseloads, meeting timeliness standards, and ensuring accurate benefit delivery. Adding additional layers of required activity—particularly those that are triggered at high frequency—can strain resources and divert attention from core program functions.

A key concern is that the NAC may function as an additional layer of administrative infrastructure rather than a fully integrated component of existing systems. Where integration is incomplete, agencies may be required to operate parallel processes, increasing complexity and the potential for error. From a PRA perspective, the preferred approach is one that minimizes duplication and embeds compliance within streamlined, automated workflows. To the extent that the NAC falls short of this ideal, it risks increasing administrative burden without delivering commensurate efficiencies.

## **V. VERIFICATION PROCESSES AND MATCH ACCURACY**

The effectiveness of the NAC depends not only on the volume of queries conducted, but on the accuracy and usability of the matches generated. Positive matches trigger a series of follow-on actions, including verification by state staff, coordination with other jurisdictions, and communication with affected households. Each of these steps consumes time and resources, and their cumulative burden can be substantial even if individual actions are relatively brief.

An important consideration is the rate of false positives or ambiguous matches. If the system generates a significant number of matches that do not ultimately reflect true duplicate participation, the verification process becomes a source of administrative inefficiency. Staff must expend time resolving cases that do not result in corrective action, and households may be drawn into processes that create confusion or delay without clear benefit. The PRA requires agencies to consider not only the volume of activity, but the quality and precision of the outputs that drive that activity.

Improving match accuracy is therefore central to improving the overall efficiency of the system. Investments in data quality, matching algorithms, and system design may yield greater returns than simply increasing the number of queries conducted. A more precise system reduces unnecessary verification work and ensures that administrative effort is focused on cases where there is a meaningful likelihood of improper participation. This is consistent with a broader principle of regulatory design: targeting interventions where they are most likely to produce results.

---

## **VI. IMPACT ON HOUSEHOLDS AND PROGRAM ACCESS**

While the primary burden of the NAC falls on state agencies, households are also affected through the notice and response processes triggered by system matches. When a potential duplicate is identified, individuals may be required to respond to notices, provide additional information, or otherwise engage with the administrative process. Even when these interactions are relatively brief, they can create friction, particularly for households that are already navigating complex eligibility requirements.

It is important to ensure that fraud prevention measures do not inadvertently create barriers for eligible participants. Systems that generate frequent notices or require repeated responses can contribute to confusion, delays, or perceptions of administrative burden. In some cases, this may discourage participation or lead to incomplete applications. While these effects may be unintended, they are relevant to the PRA's requirement that agencies consider the full impact of information collection on respondents.

At a broader level, program integrity and program access are not competing objectives; they are complementary. A well-functioning system protects resources while ensuring that eligible individuals receive benefits in a timely and predictable manner. Achieving this balance requires careful attention to how administrative processes are experienced by participants, and a commitment to minimizing unnecessary complexity or burden at the household level.

## **VII. FEDERALISM AND SYSTEM DESIGN**

The SNAP program is administered through a federal-state partnership, and state agencies vary significantly in their operational environments. Differences in caseload size, IT infrastructure, staffing models, and administrative processes all affect how new requirements are implemented. A uniform approach to NAC implementation may not fully account for these differences, leading to inefficiencies or unintended burdens in certain contexts.

From a system design perspective, flexibility and adaptability are critical. States should have the ability to integrate NAC requirements in ways that align with their existing systems and processes, rather than being forced into rigid structures that may not fit local conditions. This includes the potential for risk-based approaches to querying, where the intensity of data matching is calibrated based on factors such as case characteristics, historical error rates, or other indicators of risk.

A one-size-fits-all approach may be administratively convenient at the federal level, but it can impose disproportionate costs at the state level. Recognizing and accommodating variation across states is consistent with both sound administrative practice and the PRA's emphasis on minimizing burden. It also increases the likelihood that the system will be implemented effectively and sustainably over time.

---

## **VIII. RECOMMENDATIONS**

To strengthen the NAC information collection and ensure alignment with PRA principles, CRAE offers several recommendations. First, FNS should consider adopting a more calibrated, risk-based approach to querying. Rather than requiring uniform queries at all triggering events, the system could prioritize cases where the likelihood of duplicate participation is higher. This would reduce overall burden while maintaining focus on program integrity.

Second, FNS should enhance transparency and validation of its burden estimates. This includes providing more detailed documentation of the methodology used to derive query volumes and conducting sensitivity analyses to assess how different assumptions affect total burden. Where possible, additional data from a broader set of states should be incorporated to improve the reliability of national estimates.

Third, FNS should prioritize system integration and automation to reduce administrative friction. This includes minimizing manual verification steps, streamlining notice processes, and ensuring that NAC functionality is embedded within existing eligibility systems rather than operating as a separate layer. Investments in system design that improve efficiency will yield long-term benefits in both cost and performance.

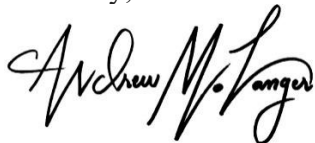
## CONCLUSION

CRAE appreciates FNS's efforts to strengthen SNAP program integrity and recognizes the importance of preventing duplicate benefit issuance. The NAC represents a meaningful step toward a more coordinated and effective interstate data system, and its underlying objectives are sound. Ensuring that public resources are used appropriately is a fundamental responsibility of program administration and a key component of maintaining public trust.

At the same time, the success of the NAC will ultimately depend on how well it balances integrity with efficiency. The PRA provides a framework for achieving that balance by requiring that information collection be necessary, proportionate, and practically useful. As currently structured, the ICR raises concerns regarding burden scale, methodological assumptions, and system design. Addressing these issues through targeted refinements will strengthen the NAC and improve its effectiveness.

Effective fraud prevention is not a function of volume alone. It depends on precision, discipline, and the thoughtful integration of data systems into existing administrative processes. By focusing on these principles, FNS can ensure that the NAC delivers meaningful improvements in program integrity while maintaining an efficient and accessible SNAP system for the millions of Americans it serves.

Sincerely,

A handwritten signature in black ink that reads "Andrew M. Langer". The signature is written in a cursive style with a large, stylized initial "A".

Andrew M. Langer  
President  
Main Street Foundation

**Appendix E.3a Response Main Street Foundation  
OMB Control Number 0584-0684**

**From:** [SM.FN.SNAPSAB](#)  
**To:** [andrew@cooperativepolicy.org](mailto:andrew@cooperativepolicy.org)  
**Subject:** Comment on FR Doc # 2026-04203  
**Date:** Friday, May 8, 2026 9:03:59 AM  
**Attachments:** [Comment\\_Main Street Foundation.pdf](#)

---

Thank you for your comment. All public comments will be taken into consideration and addressed in the information collection request submitted to the Office of Management and Budget (OMB). When the information collection request is submitted to OMB, a 30 day notice will be published in the Federal Register announcing its submission. The submission, with responses to public comments, will be available at [www.reginfo.gov](http://www.reginfo.gov).

Sincerely,

Food and Nutrition Service  
United States Department of Agriculture

<b>As of:</b> 5/8/26, 9:12 AM
<b>Received:</b> May 04, 2026
<b>Status:</b> Pending_Post
<b>Category:</b> Individual
<b>Tracking No.</b> mor-s7rp-ky6d
<b>Comments Due:</b> May 04, 2026
<b>Submission Type:</b> Web

# PUBLIC SUBMISSION

**Docket:** FNS-2026-0135

Agency Information Collection Activities: Supplemental Nutrition Assistance Program: Requirement for Interstate Data Matching To Prevent Multiple Issuances

**Comment On:** FNS-2026-0135-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Supplemental Nutrition Assistance Program: Requirement for Interstate Data Matching to Prevent Multiple Issuances

**Document:** FNS-2026-0135-DRAFT-0004

Comment on FR Doc # 2026-04203

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

Comment 5/4/26 - FNS-2026-0135-0001

RE: Supplemental Nutrition Assistance Program: Requirement for Interstate Data Matching to Prevent Multiple Issuances

It is not evident that the estimated burden accounts for the security risks of the data matching program. The amassing of personal data on so many households will create a target for hackers and data miners seeking to commit fraud. The risk of data breach will disincentivize participation or could subject already-vulnerable families to scams. When private companies are responsible for a data breach, customers are often given free credit monitoring services or other compensation. What measures will state and federal governments take to minimize risk and/or to compensate persons whose data is compromised? Changing program eligibility requirements and requiring the use of a new system is likely to impose a heavy burden on state governments. The agency should take a measured approach by deferring implementation, so that states can plan for the cost of implementation, or granting temporary waivers for implementation and compliance.

It is not evident that the projected savings from reducing "multiple issuances" would justify the cost of implementation. The agency should assess whether there is sufficient return on investment to justify the rule change. Perhaps the data checking could be implemented through future system upgrades more efficiently, or by a system that integrates with existing state systems to reduce the burden on state governments.

# Virginia Response to SNAP NAC Implementation

Date: March 27, 2026

To: Food and Nutrition Service (FNS), USDA

From: Virginia Department of Social Services

## I. Strategic Alignment and Support

Virginia appreciates the opportunity to comment on the proposed regulatory changes regarding the National Accuracy Clearinghouse (NAC). We remain fundamentally supportive of this initiative, recognizing its potential to bolster program integrity, mitigate improper payments, and reduce Supplemental Nutrition Assistance Program (SNAP) error rates. We view the NAC as a vital tool for systematically curbing both fraudulent activity and its underlying precursors. To ensure its success, we offer a perspective on how these proposed changes intersect with the operational realities of a large, county-administered state.

## II. Implementation Timelines and Administrative Synchronization

Virginia is currently among the 26 states in the implementation phase. We commend FNS for adjusting the implementation timeline from 12 to 36 weeks, which more closely reflects the technical rigor required for a project of this magnitude. To maximize the utility of this extended window, we suggest a more synchronized approach between technical development and administrative oversight.

In Virginia, the commencement of work with our information technology (IT) vendor is contingent upon a 90-day Statement of Work (SOW) review cycle, which includes a 30-day internal review and a 60-day FNS approval period. Currently, these administrative milestones often sit outside the development timeline. We encourage FNS to harmonize these review protocols with regional offices to ensure that the 36-week development phase remains dedicated to system build and testing.

### III. Underestimation of Resource and Training Burdens

As a county-administered state, Virginia's infrastructure is decentralized across 120 local agencies. While we understand the basis for the FNS projection of 200 eligibility workers per state, this figure does not fully capture the scale of a decentralized workforce. To ensure uniform compliance and program integrity, Virginia must provide training to approximately 4000 workers across all 120 local jurisdictions.

Furthermore, we suggest revisiting the "ongoing burden" estimate. Integrating NAC queries into daily workflows at application, recertification, and for household changes represents a permanent evolution of operational requirements. Adjusting the burden estimate to reflect this new reality will allow for more accurate state-level resource planning and local agency support.

### IV. Data Integrity and Vulnerable Populations

Virginia supports the NAC's rigorous data-matching capabilities and welcomes further clarity on data-sharing protocols. However, the existing requirement to publish a State's complete SNAP caseload daily is inherently inefficient, as it necessitates the high-volume transmission of static data that may remain unchanged for weeks or months. Refining the granularity of current guidance would help streamline these processes, reduce administrative complexity, and improve overall efficiency.

To reduce redundancy and system latency, Virginia recommends transitioning to a reporting model, in which states would transmit only data modified within the nightly batch, specifically newly approved cases, redeterminations, processed changes, and terminations. In doing so, the states could expect enhanced technical performance while maintaining the integrity of the interstate data system.

We also share FNS's commitment to protecting legitimate households, particularly those with children. Our mutual goal is to implement the NAC in a way that prevents "false positives". It ensures that data-matching precision does not inadvertently lead to "churn" or delay benefits for eligible families.

## V. Operational Considerations for Local and Centralized Staff

The transition to the NAC creates unique operational demands within Virginia's localized staffing model:

- **Centralized Verification Scaling:** Currently, a specialized Home Office team manages out-of-state verifications for the entire Commonwealth. The projected increase in query volume, particularly during peak recertification periods, will necessitate a significant scaling of this centralized function to prevent state-level bottlenecks.
- **Local Agency Workflow Impacts:** For the thousands of Benefit Programs Specialists across our 120 local departments, the increased query volume increases processing time per case. We are focused on managing this shift to prevent backlogs that could lead to procedural denials or delays for households in need.
- **User Interface Optimization:** We advocate for a highly intuitive, non-redundant data interface. Enhancing the user experience will mitigate worker fatigue and enable staff

to efficiently distinguish actionable data from administrative noise, thereby supporting more accurate eligibility determinations.

## VI. Conclusion and Collaborative Outlook

Virginia concurs with the 35-hour annual expectation for Computer Matching Agreements (CMA), as this aligns with our current data and privacy review protocols. We are eager to partner with FNS to realize the long-term integrity and cost-saving benefits of the NAC. By addressing these logistical and operational nuances together, we can ensure a successful implementation that serves both taxpayers and vulnerable populations in the Commonwealth.

# PUBLIC SUBMISSION

<b>As of:</b> 5/6/26, 12:37 PM
<b>Received:</b> March 31, 2026
<b>Status:</b> Pending_Post
<b>Tracking No.</b> mnf-2lzq-hsi6
<b>Comments Due:</b> May 04, 2026
<b>Submission Type:</b> API

**Docket:** FNS-2026-0135

Agency Information Collection Activities: Supplemental Nutrition Assistance Program: Requirement for Interstate Data Matching To Prevent Multiple Issuances

**Comment On:** FNS-2026-0135-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Supplemental Nutrition Assistance Program: Requirement for Interstate Data Matching to Prevent Multiple Issuances

**Document:** FNS-2026-0135-DRAFT-0001

Comment on FR Doc # 2026-04203

---

## Submitter Information

**Name:** Wendy Cook

**Address:**

Eugene, OR, 97405

**Email:** fruit-flanked-huff@duck.com

---

## General Comment

Reading the proposal, this seems like an enormous amount of additional effort by state agencies for a “problem” that likely does not exist at a large scale. I urge you to err on the side of encouraging state services to put healthy, cost-effective food on the plates of hungry Americans, instead of bogging them down in unnecessary administrative chores.

**Appendix E.5a Response Wendy Cook**  
**OMB Control Number 0584-0684**

**From:** [SM.FN.SNAPSAB](#)  
**To:** [fruit-flanked-huff@duck.com](mailto:fruit-flanked-huff@duck.com)  
**Subject:** Comment On FR Doc # 2026-04203  
**Date:** Friday, May 8, 2026 9:08:19 AM  
**Attachments:** [Comment\\_Wendy\\_Cook.pdf](#)

---

Thank you for your comment. All public comments will be taken into consideration and addressed in the information collection request submitted to the Office of Management and Budget (OMB). When the information collection request is submitted to OMB, a 30 day notice will be published in the Federal Register announcing its submission. The submission, with responses to public comments, will be available at [www.reginfo.gov](http://www.reginfo.gov).

Sincerely,

Food and Nutrition Service  
United States Department of Agriculture