



United States Department of Agriculture

Office of the Secretary
Washington, D.C. 20250

JUN 21 2011

The Honorable Nancy T. Buckner
Commissioner
Department of Human Resources
South Gordon Persons Building
50 Ripley Street
Montgomery, Alabama 36130

Dear Commissioner Buckner:

Thank you for your continued efforts to ensure access to and integrity in the Supplemental Nutrition Assistance Program (SNAP) during this time of increasing caseloads. As you know, SNAP is designed to expand during times of economic downturn and contract as the economy recovers. The program is performing as designed, providing important food and nutrition assistance to over 44 million low-income Americans in February 2011. The partnership between the Food and Nutrition Service (FNS) and State agencies that administer the program ensures that these families and their communities benefit from a program that strengthens food purchasing power and stimulates the economy.

At a time of historic and unprecedented growth in SNAP, recent data demonstrates that our shared program integrity efforts are yielding results and continue to trend in the right direction. Both quality control, in terms of certification error rates, and trafficking, in terms of percentage of benefits trafficked, remain at record-low levels.

However, it also remains clear that there is still more work to be done. To that point, I am troubled by the examples of recipients misusing their benefits that continue to come to light. These examples include recipients that traffick their benefits with unscrupulous retailers or sell their benefits to other individuals at a discount. I recognize that these recipients constitute a small percentage of the entire recipient population, but with a program as large as SNAP, a small percentage can mean a large dollar volume. Consequently, I firmly believe we need to redouble our efforts in pursuing and preventing these violations.

As you may be aware, we maintain at FNS a wealth of SNAP transaction data in our data mining system called ALERT. While we routinely share the data associated with actions we take against fraudulent retailers with those States that are interested in working with that data to bring actions against involved recipients, not all States have accepted our data or used that data to take such actions. I want to encourage you all to be more active and vigilant in this arena. Moreover, I want you to know that FNS is interested in working with each State to develop new and creative approaches by providing additional data that would be of use in tracking and investigating fraudulent recipients, as well as by together looking at sensible procedural changes and policy options that could help mitigate this troublesome activity.

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One data element that I have in mind is that of frequently requested replacement electronic benefit transfer (EBT) cards. Based on our ALERT data, I believe numbers of households that routinely replace cards is sufficiently high to raise questions. Understanding that many participants, such as those with disabilities, have completely legitimate reasons for requesting replacement cards, I also recognize that it can be an indicator that cards are possibly being sold. Combining this information with other data on how a particular household's benefits are being used can be a very strong investigative tool and potentially allow actions to be taken based on the data. FNS staff stand ready to work with your investigative staff to share the data we have and look at utilizing our and your information in the best possible way. Towards that end, I will ask the FNS Regional Administrators to have their SNAP Directors contact each of your SNAP Directors and explore how we may better work together in this important area.

SNAP has proven to be a vital program in these tough economic times. It is critical that we work together to ensure that this Program's benefits are used as intended and that the Program as a whole stands up well in the face of close public scrutiny. We cannot forget that SNAP puts healthy food on the table for over 44 million people each month, half of whom are children. Serving about 1 in 7 Americans each month, SNAP is the cornerstone of America's safety-net against hunger. I do not want this important program harmed by a small minority that would misuse their benefits.

Please let me know if you have any questions or would like to discuss this area with me personally.

Sincerely,



Kevin W. Concannon
Under Secretary
Food, Nutrition, and Consumer Services