

From: Shahin, Jessica - FNS <jessica.shahin@fns.usda.gov>
Sent: Thursday, January 10, 2019 6:26 PM
To: FNS Regions
Subject: Early Issuance Q&As #1

Regional partners,

Please transmit these attached Q&As to your State agencies with the message below. Please confirm when you have transmitted to your States.

Thank you,
Jessica

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Attached please find the first set of Questions and Answers related to the early issuance of benefits to SNAP households for February 2019. The Food and Nutrition Service looks forward to continuing conversations with State agencies and other stakeholders in the coming days as we work together to ensure participants receive the benefits for which they are eligible.

We are continuing to work through State questions that have been submitted to date and encourage States to continue sending inquiries to their respective Regional Offices so that we can provide timely guidance and implement this process as smoothly as possible. Additional Q&A documents will be forthcoming.

Thank you again for your diligence and commitment to effective and efficient administration of this important program. We truly value our shared commitment to serving SNAP households and thank you for your flexibility and patience during this uncertain time.

If you have further questions regarding the Q&As attached here, please reach out to your Regional Administrator.

Thank you,

Jessica

Jessica Shahin
Associate Administrator
Supplemental Nutrition Assistance Program (SNAP)
Food and Nutrition Service
US Department of Agriculture

Early Issuance of February 2019 SNAP Benefits – Questions & Answers #1

- 1. Are there administrative funds available for February? Must the State take special action by January 20th to draw down these funds as well?**

There will be administrative funds available for February. Once these funds are available to State agencies they are considered obligated and States should draw down funding in accordance its standard procedures; no alternative action is necessary.

- 2. Do States need to send a waiver request to FNS for early issuance or can they move forward with getting these benefits out?**

Under the blanket waiver States can start the process immediately but do need to let FNS know certain information. States need to confirm to their Regional Office that they can accomplish early issuance by January 20th and provide the schedule for the early issuance. Regional Offices have been in communication with States about details of the early issuance process and information needed.

- 3. Can States use a staggered approach to issue the benefits with January 20th being the last date of issue?**

Yes, States may choose to stagger or may issue all benefits on the 20th, whichever they prefer. Individual States should work directly with their EBT vendors to discuss the early issuance schedule that will work best for them.

- 4. Must the EBT vendor have processed the file and requested the increase in the letter of credit to officially obligate the funding by January 20th?**

The EBT vendor has to process the file with an availability date no later than the 20th. The AMA file needs to reflect availability dates no later than the 20th for the issuance.

- 5. Should States continue normal SNAP operations after completing the early issuance process?**

States must continue accepting applications and determining eligibility for SNAP. Limited funding within the SNAP contingency reserve is available for these cases; it is for this reason that it is so critical that States issue their regular ongoing benefits by January 20th. FNS is committed to minimizing the impact of the appropriations lapse on SNAP households and directing the limited funding available from the contingency that can be used toward

normal SNAP operations, including the issuance of benefits for new applicants in February, should the Federal government shutdown continue.

FNS has provided guidance indicating that the Continuing Resolution that expired on December 21, 2018, provided administrative funding for January and February in addition to January benefits and the early issuance of February benefits. It is critical that States are able to maximize the early issuance solution in order to ensure that all eligible SNAP households receive benefits for February.

6. Can we send daily benefit files from January 20th through January 31st?

The Continuing Resolution that expired on December 21, 2018, provided funding for January benefits. States should continue sending daily files to their EBT processors for benefits that will have availability dates through January 31st.

7. 7 CFR 273.2 (g)(2) indicates that SNAP households who apply after the 15th of the month and are determined eligible for the initial month and subsequent months may be issued a combined allotment at the State agency option for the month of application and benefits for the first full month of participation. If a household applies after January 15th can we issue them a combined January/February allotment?

If the household is determined eligible and the combined benefit issued with an availability date on or before January 31st, any such program issuances made under this provision are proper obligations of January 2019. As such, they are provided for in currently available program funding.

8. How should States handle new applications that are determined eligible for February benefits if they will not receive a combined allotment in January?

Limited funding within the SNAP contingency reserve is available for these cases; it is for this reason that it is so critical that States issue their regular ongoing benefits by January 20th. States should handle new applications for February benefits according to normal procedures.

9. Are there notice requirements for the change in issuance date for February benefits?

States should handle the noticing as they would a mass change, which may be publicized via the news media, posters in certification offices, issuance locations, or other sites frequented by certified households, or general notices mailed to households.

Clear communication will be key to ensuring the early issuance process goes smoothly. State agencies must engage in appropriate outreach and communication strategies to ensure that SNAP households understand that benefits are being issued earlier, rather than in addition to, their normal allotment, so participants can properly budget and plan.

10. What cases should be included in the early issuance? Should pending recertifications scheduled to close on January 31st be included in the issuance file sent by January 20th?

State agencies should include all cases that would normally be included in their recurring monthly issuance file in the early issuance for February. Cases due to recertify or submit periodic reports at the end of January may also be included if they have submitted their reports or completed all of their recertification actions by the time the State sends the early issuance file. Cases that have not completed the required actions by the date the State sends the early issuance file should be processed as normal. Limited funding within the SNAP contingency reserve is available for these cases; it is for this reason that it is so critical that States issue their regular ongoing benefits by January 20th. States should complete processing and send files to their EBT processors to issue February benefits to any such cases once they complete the required actions.

11. Will FNS provide States with a “hold harmless” for Quality Control purposes for errors associated with the early issuance of February benefits?

Due to the extenuating circumstances associated with the Federal government shutdown, FNS has determined that early issuance of February SNAP benefits is the best way for households to continue receiving the nutrition assistance for which they are eligible. We recognize the challenges associated with this solution, particularly given the short timeframe for implementation. As such, FNS is willing to consider holding State agencies that issue February benefits early harmless from Quality Control (QC) errors associated with that overissuance within limited parameters. Once the early issuance has been completed, FNS will revisit this issue with States and may issue further guidance depending upon the scope of the challenges.