
From: Shahin, Jessica - FNS
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To: FNS Regions
Subject: Q&A document, Volume 2
Attachments: Early Issuance QA #2_FINAL_1.14.19.docx

Please find attached the second set of Q&As to distribute to States related to the administration of SNAP during the lapse in funding.

Please let us know if you have any questions.

Thanks,

Jessica

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Early Issuance of February 2019 SNAP Benefits – Questions & Answers #2

- 1. Can you please provide clarification regarding the answer to #10 in the 1/10/2019 Q&A relating to pending recertifications? Should recertifications (expiring in January) that are still pending at the time the early issuance file is sent be included in the early issuance file, or should they be sent after all case actions are complete (interview, eligibility authorization)? Can you confirm that the contingency reserve is available to provide benefits for these cases in February?**

Recertification issuance files should only be sent to the EBT processor after all actions are complete. FNS can confirm that limited funding is available from the contingency that can be used to provide benefits for February. This reserve is being used to fund recertifications and new applications through February.

- 2. Will benefits available by January 31st still be available for use after the 31st?**

Yes.

- 3. For applications with a date of application prior to February but not approved until February— are we to issue the prior months benefits? If a supplement or restoration needs to be issued after January 20th for a previous month of benefits, can these benefits be issued to the customer?**

Yes, States should handle these situations according to normal procedures.

- 4. Is there any possibility that we will have access to SNAP QCS?**

SNAPQCS is currently operational. States should continue submitting files to QCS as they normally would. FNS will notify States should the status of QCS change.

Note: The information provided on the 1/11/19 Conference Call that the SNAPQCS was shut down was incorrect.

- 5. 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.

6. What are the specific notice requirements for early issuance of February benefits?

As indicated in FNS' 1/9/2019, Q&A, States should treat the early issuance as they would a mass change for the purpose of noticing SNAP households. States should refer to 273.12(e)(1) regarding notice requirements.

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.

7. Will FNS provide more detail on a “hold harmless” for Quality Control purposes?

Not at this time.

8. The blanket waiver for the early issuance does not include a waiver of the 40-day limit between issuances? Would FNS approve such a waiver due to the extraordinary circumstances?

FNS appreciates the challenges the early issuance is presenting to States and recognizes that it will require effective communication and strategic budgeting in order for SNAP households to continue meeting their food needs while receiving their benefits outside of the normal issuance cycle. Once the early issuance is completed, FNS expects to work closely with our State agency partners to mitigate these challenges and develop solutions that balance effective program administration with meeting the needs of the households we serve.

9. If the shutdown is resolved and the Federal government reopens prior to the early issuance date, does FNS expect States to change course and issue February benefits on their normal schedule?

No. Given the short timeframe before the early issuance files are due to the processors, it is critical that States continue working toward the deadlines provided to ensure eligible households receive benefits for February. If the status of appropriations changes in the coming days, FNS expects that States will likely move forward with the early issuance; States would not be required to make changes to their plans.