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Sent: Friday, January 18, 2019 3:01 PM

To: FNS Regions

Subject: Q&A document, Volume 3

Please find attached the third 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 ... Jeff

- 1. Will FNS consider granting a waiver of mandatory verifications or recertification interviews or to allow extending certification periods so that States can complete processing on cases in advance of the early issuance date?**

FNS is not considering granting such waivers at this time. At their option, States may utilize existing regulatory flexibilities to extend certification periods up to the statutory maximum (24 months for households with an elderly/disabled member, 12 months for non-elderly/disabled households) if it would improve customer service and ease program administration at this time.

As indicated in Question 1 of our January 14th Q&A (Q&A #2), FNS can confirm that limited funding is available from the contingency that can be used to provide benefits for February. States should process cases as normal and send those that have been completed by the transmission date of the early issuance file to their EBT processors. They should then continue working case actions throughout the remainder of the month and, as cases are completed, send them to their processors in the daily files.

- 2. Is the eDRS working? How are IPV disqualifications being handled after the 20th?**

eDRS is currently operational and States should continue using the system and following normal procedures for IPV matches and disqualifications.

- 3. If a household requests February replacement benefits, can those be issued?**

Yes. As indicated in Question 1 of our January 14th Q&A (Q&A #2), FNS can confirm that limited funding is available from the contingency that can be used to provide benefits for February. In an instance where a household requests replacement benefits, States should follow their normal procedures.

- 4. Notices go out 60 days in advance. Should States hold notices for future months since funding is uncertain?**

States should continue to follow their normal procedures in administering the program, including issuing notices to households about their case status. FNS will notify States if they need to take different action.

- 5. Will States be receiving additional funding for SNAP Employment & Training (E&T) and SNAP Ed activities in February?**

Yes. States are receiving additional funding for SNAP-Ed and Employment and Training, including both 100% and 50/50 E&T funds, for the month of February.

- 6. Processors say they will be billing for the early issuance in February, but the FNS blanket waiver says that we are supposed to charge those expenses to January. Which is correct?**

Please follow normal billing practices and consider the early issuance of February SNAP benefits a February issuance event for purposes of cost per case month whenever it is invoiced and billed.

7. Processors are billing additional fees for early issuance resources and customer service coverage. Will FNS cover these costs?

Although the SNAP agencies need to work out costs with their EBT processors, FNS is fully expecting there to be some additional costs for resources to make this happen, and to account for higher than normal volumes for customer service call centers. These are legitimate State administrative expenses that will be subject to 50:50 Federal Financial Participation.

8. If Federal funding for benefits runs out, is it possible for a State to step in to cover the cost of SNAP benefits?

If a State were to undertake this course of action, it would need to do so at its own risk and with no assurance of Federal reimbursement. Actions USDA has taken, in concert with State partners will help to ensure that SNAP issuance continues to be available through the month of February. USDA's focus is the successful implementation of the early issuance of February benefits. We are hopeful Congress will soon pass an appropriations bill the President can sign while we continue to explore all possible solutions to ensure the continuity of program operations.