



Food and Nutrition Service
1320 Braddock Place
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Date: June 29, 2020
Subject: Supplemental Nutrition Assistance Program (SNAP) – Fiscal Year 2021
Federal Management Evaluation Target Areas
To: Regional Administrators
Supplemental Nutrition Assistance Program Directors
All Regions

Fiscal Year 2021 Federal SNAP Management Evaluation Target Areas

The Food and Nutrition Service (FNS) is targeting the SNAP Management Evaluations (MEs) listed in the table below for Fiscal Year (FY) 2021. The FNS National Office selected these target areas in consultation with the FNS Regional Offices (ROs).

Federal Target Area:	Applies to:
Employment and Training (E&T) Program Review	All States operating mandatory E&T programs.
Quality Control (QC) Integrity Review	One State per region.
Certification Program Access Review (Certification PAR)	Two or more States per Region.
Reporting Program Access Review (Reporting PAR)	One or more States per region, excluding any State reviewed in this area in FY 2020 or FY 2019.

Additional Guidance on the New Certification PAR and Reporting PAR

The Certification PAR¹ is being introduced in FY 2021 to replace the State PAR and the Local PAR. The Reporting PAR (also referred to as the “Reporting Module”) was introduced in FY 2019. ROs will be required to conduct these MEs at least once in every State by the end of FY 2023. Under this timeline, ROs would have from FY 2021 through FY 2023 to conduct the new Certification PAR in every State, and from FY 2019 through FY 2023 to conduct the Reporting PAR in every State (ROs may count Reporting PARs conducted in FY 2019 and FY 2020). From FY 2024 on, ROs will conduct the Certification PAR in each State at least every 3 years and the Reporting PAR in each State every 4 years, consistent with their respective minimum review cycles (as indicated below in the minimum review cycle table). ROs should consider this longer term implementation plan in scheduling for FY 2021.

¹ The Certification PAR Guide and Tools were developed by a cross-RO/National Office workgroup led by the Southwest RO in FY 2020. These materials are in the final stages of clearance at the National Office and will be released by August 2020, ready for use by all ROs in FY 2021.

At-Risk Areas and Minimum Review Cycles

In addition to conducting MEs for the target areas in FY 2021, the ROs have discretion to conduct MEs in States that they find to be at-risk in a particular functional area. In general, the ROs should evaluate whether a State is at-risk based on factors such as caseload size, known or suspected deficiencies, QC data, recent policy changes, new system implementation, or systems changes that affect the functional area. There are also particular risk factors worth noting for particular functional areas. For the ABAWD area, a waiver status change and/or the implementation of a new ABAWD tracking system may indicate risk. For the Reporting PAR, a change in reporting system, for example a State moving from simplified reporting to change reporting, may indicate risk. For the E&T area, the implementation of a new eligibility system or E&T management information system (MIS), or an E&T budget in excess of \$15 million, may indicate risk.

Absent a State being subject to a target area or found at-risk for the fiscal year, the ROs must conduct MEs in each State at least as frequently as required by the minimum review cycle as shown in the following table.

Functional Area:	Minimum Review Cycle:
State ME System	Every 2 years (7 CFR 275.3(b))
Certification PAR	Every 3 years (beginning in FY 2024)
Reporting PAR	Every 4 years (beginning in FY 2024)
ABAWD	Every 5 years
E&T	Every 5 years
QC Statistical	Every 5 years
QC Integrity Review	Every 5 years
Recipient Claims	Every 5 years
Recipient Integrity	Every 5 years
SNAP-Ed	Every 5 years
EBT	Every 6 years

Examples:

1. If the RO conducted a State ME System Review in FY 2019, it would conduct the next in State ME System Review in FY 2021, consistent with the 2-year cycle for that functional area (or sooner if the State is found to be at-risk before FY 2021).

2. If the RO conducted a Recipient Claims Review in FY 2019, the RO would plan to conduct the next Recipient Claims Review in FY 2024, consistent with the 5-year cycle for that functional area (or sooner if the State is found to be at-risk before FY 2024).

Scheduling

The ROs must develop a preliminary review schedule for the upcoming fiscal year and enter it into MEMS NextGen by September 1, 2020. The ROs should finalize the review schedule by October 1, 2020, and update it throughout the year if needed.

Federal Procedures

ROs must follow the [SNAP ME Guidance](#) and the standardized SNAP ME Functional Area guides in their entirety for all MEs conducted, unless advised of specific exceptions for the upcoming fiscal year by this memo. For FY 2021, there are two such exceptions:

- Any EBT Review should focus on adjustments; and
- In the event that an RO conducts a remote ME due to the COVID-19 public health emergency, as explained in the subsequent section.

Potential Need to Adapt Procedures based on the COVID-19 Public Health Emergency

In the event that an RO cannot conduct an ME onsite due to local health and safety conditions, potential travel restrictions, or other impacts of the COVID-19 public health emergency, ROs will have the discretion to conduct the ME remotely (as an offsite “desk review”) to the extent necessary. In doing so, ROs would tailor aspects of the functional area ME guide and methods therein as needed. The decision to conduct an ME remotely, in full or in part, must be approved at the Regional Program level in order to “count” as an ME. ROs must document these decisions and actions in the ME Regional Review File.

This approach follows the SNAP ME guidance, which suggest that ROs conduct remote reviews in the event of a virus outbreak, and the June 3, 2020, *SNAP Revised Plan for Fiscal Year 2020 Federal Management Evaluations Disrupted by COVID-19*, which includes a plan for piloting remote MEs in a number of States in the remaining months of FY 2020. National Office is supporting an RO workgroup on these pilots with the goal of sharing information, approaches, lessons learned, and best practices across ROs to inform the practice of conducting remote MEs, as needed, in FY 2021.

We appreciate the efforts made by you, your staff, and your State agency partners to improve program integrity and access through the SNAP ME process. Please contact Casey McConnell at casey.mcconnell@USDA.gov with any questions about this memorandum.

Sincerely,

Jessica Shahin
Associate Administrator
Supplemental Nutrition Assistance Program