



Food and  
Nutrition  
Service

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Center

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DATE: July 13, 2016

SUBJECT: Requirement to Conduct Live Pilot Test in SNAP System Implementations

TO: State Directors  
Supplemental Nutrition Assistance Program (SNAP)  
All State Agencies

In February of 2014 the Food and Nutrition Service (FNS) sent out guidance on the new final regulation that became effective March 3, 2014 requiring adequate testing of new State computer systems for eligibility and issuance. This guidance was based on a provision in Food, Conservation and Energy Act of 2008 (the 2008 Farm Bill). It requires that states conduct adequate system testing, and system pilots, and that FNS approve the results of each before the state can advance from testing to pilot, or from pilot to rollout. The rule itself, as well as supporting information, can be found on the State Systems page of the FNS public website at: <http://www.fns.usda.gov/apd/new-rule-system-testing>

We are providing additional guidance with a focus on the requirements for a pilot. In 7 CFR 277.18(g) (2) (ii) it states,

*“Pilot. Prior to statewide rollout of the system there must be a test of the fully operational system in a live production environment. Pilots must operate until a state of routine operation is reached with the full caseload in the pilot area. The design of this pilot shall provide an opportunity to test all components of the system as well as the data conversion process and system performance. The duration of the pilot must be for a sufficient period of time to thoroughly evaluate the system (usually a minimum duration of three months). The State agency must provide documentation to FNS of the pilot evaluation. FNS approval to implement the system more broadly is a condition for continued FFP.”*

There are three key components that describe an approvable pilot:

1. Testing the fully operational system in a live production environment – Testing the system using ‘parallel processing’ does not meet the requirement. Parallel processing is generally described as entering case data into the legacy system and then into the new system to compare results. In this approach the legacy system remains the system of record to and from which data is transmitted to interface partners including the benefit issuance system.
2. Routine operation is reached with the full caseload in the pilot area – Working only a subset of cases in the pilot area does not meet the requirement. This approach does not test the performance of the system or that the new system works well within the State agency’s business process design.
3. Minimum duration of three months – A state of routine operations cannot generally be achieved in less than three months.

Recently we have seen proposals for pilots that do not meet one or more of these requirements. There is too much risk in not demonstrating how the new system will operate in a live production environment, how the interfaces will work, and whether or not the new system integrates into the State agency's business processes to approve these approaches. State agencies will be held to the regulatory requirement, and should plan for a live pilot.

States are encouraged to visit the website at the link provided above. In addition to the regulation itself, the website offers additional guidance on the testing process.

Please ensure that this letter is shared with information system planning teams, project managers, IT staff, or others who are responsible for project compliance with FNS requirements.

If you have any questions, please contact your FNS State Systems Analyst, identified here, [http://www.fns.usda.gov/sites/default/files/apd/SSO\\_Contact\\_List.pdf](http://www.fns.usda.gov/sites/default/files/apd/SSO_Contact_List.pdf) , or your Regional Office.

## **ORIGINAL SIGNED BY**

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