

**Early Issuance of February 2019 SNAP Benefits – Questions and Answers #5
Mitigating the Impact of the Gap Between February and March Benefit Issuance
February 8, 2019**

- 1. The February 1, 2019, memo on the interval between issuances says States should make plans to issue March benefits as close as possible to within 40 days of their February issuance. Our State issued February benefits on January 17th, as requested by FNS. If we move the March issuance to within 40 days of that date, March benefits would be issued in February. Is that what you're asking us to do?**

FNS recognizes the challenge inherent in changing issuance schedules, both for SNAP households and State agencies. While issuing the February benefits early was the best solution to ensure ongoing access to SNAP for eligible households during the appropriations lapse, providing March benefits outside of their normal issuance month raises programmatic, Quality Control, and reporting concerns. February issuance of March benefits risks overissuance or underissuance. FNS expects that all States will be able to minimize the length of time between issuances while issuing March benefits on or after March 1, 2019, balancing the needs of households with program integrity and administrative efficiency.

- 2. Can a State propose to do a partial issuance of the March benefit in February and the remaining issuance of the March benefit in March?**

States should consider the most appropriate option for their specific circumstances. If logistics and time allow for this option, it can be considered.

- 3. May States issue the full March benefit in February if the State can mitigate the risks or is willing to accept them? Will this be covered by the blanket waiver or will an individual waiver be required? What kind of assurances is FNS looking for in order to approve a waiver for States to issue a household's full March benefits in February?**

A separate, State specific waiver request will be required if a State elects to issue the full March benefit in February. States must ensure that they will be able to take action to update the household's benefit amount if it changes subsequent to the issuance so that the household receives the correct benefit amount for March and in future months following normal certification and claims rules. Any waiver to allow March benefits to be issued in February will not absolve States of payment errors discovered during the quality control (QC) review process.

- 4. For States that had issuance schedules that went beyond the early issuance date, should we count only the February issuance date or, for those clients whose recurring benefit issuance falls between the 21st and the end of January, should we count 40 days from the January issuance?**

States should use the latest issuance date in calculating 40 days. If the latest date is a January issuance, States should use that date. If the latest date is the early February issuance date, States should use that date.

- 5. If we change the date of issuance for recurring benefits for one or more months going forward, in order to mitigate the interval between issuances, does the blanket waiver issued on January 10, 2019, cover these adjustments?**

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No, the blanket waiver issued on January 10, 2019, was intended to cover only the early February issuance. An amended blanket waiver regarding issuance of SNAP benefits will be provided.

- 6. If we opt to change the date of issuance one or more times to mitigate the time between issuances, our EBT Processor may charge additional fees and/or may need to adjust the cost-per-case-month fee. Are these charges legitimate State administrative expenses?**

Such charges would be considered State administrative expenses eligible for Federal Financial Participation. Payment for the month's recurring benefit issuance (i.e., CPCM) should follow the State's normal billing processes.

- 7. Will FNS notify SNAP retailers of any changes in issuance dates going forward?**

Yes, FNS intends to provide information to authorized retailers once States have reported their plans for mitigating the interval between issuances. This will allow retailers to ensure sufficient staffing and that stock is available for shopping by SNAP participants.

- 8. If there is another lapse in appropriations after February 15, 2019, will March benefits be available?**

If there is a lapse in appropriations after February 15, 2019, March benefits will be available and State Administrative Expenses incurred during March will be covered.

- 9. If there is another lapse in appropriations after February 15, 2019, will April benefits have to be issued within 30 days of February 15, 2019 (or by March 17, 2019)?**

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.

- 10. Is there a penalty if a State does not mitigate the interval between issuances such that it is 40 days or less?**

FNS believes all States share an interest in working to mitigate the interval between issuances for the benefit of the participants we collectively serve.

- 11. Is there a penalty if a State opts not to mitigate the interval and instead to simply re-start March issuance on the State's normal issuance schedule?**

FNS believes all States share an interest in working to mitigate the interval between issuances for the benefit of the participants we collectively serve.

States must be able to pull February and March QC samples. To do this, States must ensure they will be able to identify and separate February cases from the March cases issued benefits in February. States interested in a waiver should review their system functionalities and potential changes to their sampling plan, if necessary. Any changes to sampling plans to accommodate

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issuing March benefits in February must be reviewed and approved by FNS on an individual basis.

12. Can FNS do some generic messaging with the media/public service announcements to mitigate misinformation at a broad level?

While we appreciate the request, there is a risk of confusion since States will be handling the question of March benefit issuance in accordance with their individual plans, which may vary from State to State. For this reason, at this time, USDA does not plan to issue a press release or develop Public Service Announcements.

13. Is FNS considering a national supplement in February to help mitigate the interval between the early February issuance and the March issuance?

FNS has no authority or funding to provide a national supplement to households that received the early February issuance.

14. Can States use their own funds to provide a supplemental SNAP benefit in February in order to mitigate the interval between the early February issuance and the March issuance?

Additional nutrition assistance provided by a State out of its own funds may reduce the impact of longer than usual issuance intervals on participating households. However, such benefits are not SNAP issuances for QC or other administrative purposes.

15. Do the mass change rules apply to any strategy the State might employ to mitigate the interval between the early February issuance and the March issuance?

Mass change notification rules do apply to adjustments States will make to mitigate the interval between issuances.