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Department of  
Agriculture

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Food and  
Nutrition  
Service

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SUBJECT: Supplemental Nutrition Assistance Program (SNAP) Questions and  
Answers on Simplified Reporting

TO: Regional Directors  
Supplemental Nutrition Assistance Program  
All Regions

Attached is a brief overview of the policies surrounding simplified reporting and a set of questions and answers in response to related issues raised by States.

If you have any additional questions, please contact Stephanie Davis at [Stephanie.Davis@fns.usda.gov](mailto:Stephanie.Davis@fns.usda.gov).

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Attachment

## Supplemental Nutrition Assistance Program (SNAP)

### Simplified Reporting Overview

Simplified reporting (SR) allows for extended certification periods and reduced reporting requirements, thereby simplifying program participation for eligible households and easing administrative burden for State agencies.

SR regulations at 7 CFR 273.12(a)(5) provide two distinct policy options regarding how States may choose to respond to changes that occur during the certification period:

- 1) Act on all changes during the certification period, or
- 2) Act only on certain changes: Under this option, States must act on any change that would increase household benefits. The State may only act on information that would decrease benefits under certain circumstances, such as when the household has requested that its case be closed or when the State has obtained information considered verified upon receipt.

The State must follow whichever policy option it chooses exclusively and apply it to its entire SR caseload. Procedures that constitute taking action on a change include revising the household allotment level and sending the household a request for contact (RFC) notice.

Whether a State has chosen the option to act on all changes or only on certain changes, it may pursue secondary verification to validate information it receives during the certification period that is not considered verified upon receipt. Secondary verification involves contacting the information source, rather than the household, to verify unclear information about household circumstances received through a data match or another means.

### Questions and Answers

#### Verification

**Question 1:** Do SNAP regulations allow States that act only on certain changes to take adverse action based upon information initially learned through data matching that is subsequently verified with information directly from the source?

**Answer 1:** Yes, States must always act on information that is verified. Any time a State has received secondary verification of a change in household circumstances, the State can take action.

**Question 2:** Could States that act only on certain changes postpone verifying changes that become known through data matches until the next certification or periodic report date?

**Answer 2:** Yes, in most cases. Following new regulations at 273.2(f)(11) on computer matches, all States must take immediate action to pursue verification of positive matches with the disqualified recipient database. For other data matches, when a State that acts only on certain changes obtains information about a household that is *not* verified upon receipt, it has the option to pursue secondary verification at that time or to wait until the next certification or periodic report date to verify by contacting the household.

**Question 3:** If a State does obtain secondary verification that would lead to a decrease in benefits, can the State postpone the decrease until the next certification or periodic report?

**Answer 3:** No, the State agency must act on verified information.

### **Changes in Shelter Costs**

**Question 4:** When a SNAP recipient reports an address change, are State agencies required to explore continued eligibility for the Standard Utility Allowance (SUA) and excess shelter deduction?

**Answer 4:** Yes, when a household reports a change in residence, the State agency must investigate and take action on potential changes in shelter costs arising from this reported change pursuant to 273.12(c)(4)(iv).

### **Timeline for Responding to Changes**

**Question 5:** If the matching process is initiated at certification but not completed until after benefits have already been issued, must SR States that act only on certain changes take action immediately on the match results or can it wait until the next contact with the household?

**Answer 5:** States must always take immediate action to seek verification of match results through the disqualified recipient database. For other matches that are not verified upon receipt, the State agency may wait until the next client contact to verify the information. States must always take action in response to matches that are verified upon receipt.

### **Known to the State Agency**

**Question 6:** How should State agencies respond to information a SNAP household reports for another program? Would this information be considered known to the State agency?

**Answer 6:** State agencies have some flexibility to determine what is “known.” FNS policy provides that any information included in the TANF case file must be considered known to the State agency. The State agency can choose how to structure its policy in regards to other programs.

FNS issued a memo on November 24, 2008 titled Clarifying SNAP Reporting Requirements – Known to the State Agency, which addresses this issue more fully. The memo can be found on the SNAP website at [www.fns.usda.gov/snap/rules/Memo/2008/112408.pdf](http://www.fns.usda.gov/snap/rules/Memo/2008/112408.pdf). Following the policy outlined in this memo, States must follow regulations at 273.12(a)(5)(vi) to determine how to respond to information that is considered “known” under its policy.

### **Administrative Flexibilities and Waivers**

**Question 7:** For States that act on all changes for SR, are any waivers under consideration to help coordinate matches with the requirements of their simplified reporting system?

**Answer 7:** The Food and Nutrition Service (FNS) will consider waiver requests on a case by case basis.

**Question 8:** Would SR States that act only on certain changes require a waiver in order to act on changes that become known through data matches under simplified reporting?

**Answer 8:** Following regulations at 273.2(f)(11) on computer matches, States must take immediate action to verify information obtained through the disqualified recipient database. States that do not act on all changes would need a waiver to act on information received through any other data match that is not verified upon receipt.

**Question 9:** Has FNS approved any waivers allowing an SR State that chooses to act only on certain changes to modify how it responds to household information obtained during the certification period?

**Answer 9:** Yes, FNS has approved a limited number of waivers that allow States that act only on certain changes to take action on information received or matches conducted during the certification period that are not considered verified upon receipt. Under these waivers, States may send a request for contact (RFC) to the household to determine if and how this information may affect household eligibility and benefit level, and the State must report to FNS the effect this waiver implementation has on SNAP households.