



Food and
Nutrition
Service

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Center

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FEB 27 2015

SUBJECT: Guidance to State Agencies on processing SNAP Applications Submitted by Intuit (TurboTax)

TO: Regional Directors
Supplemental Nutrition Assistance Program

This memo formalizes recent email guidance on how State agencies should process Supplemental Nutrition Assistance Program (SNAP) applications submitted by Intuit (TurboTax) on behalf of low-income families. As you are aware, Intuit built functionality into its online system to screen users for SNAP eligibility and to allow them to apply for SNAP using its free software, Benefit Assist. The Food and Nutrition Service (FNS) became aware of Benefit Assist after it received several inquiries from State agencies that had received such applications.

Over the past few weeks, State agencies have expressed concerns surrounding the legality and validity of this initiative. FNS has made every attempt to respond to State agencies' concerns within its own authority. However, because Intuit is a third party entity, FNS does not have the statutory or regulatory authority to require Intuit to change or halt this initiative.

Therefore, FNS has been working with Intuit representatives to better understand Benefit Assist, to communicate States' comments and concerns, and to discuss its impact on SNAP recipients and States. Intuit indicated to FNS a commitment to work with State agencies to improve its Benefit Assist system and deliver a high quality product. Intuit stated that they have met with senior State agency staff in over 20 States and intend to meet with every State shortly.

Validity of the Application

Pursuant to the Food and Nutrition Act of 2008, as amended (the Act), and relevant regulations, States must process all SNAP applications submitted on State SNAP applications on behalf of clients by Intuit if the application includes, at a minimum, the applicant's name, address, and signature. Once the State agency receives the application, appropriate application processing time frames apply.

Intuit informed FNS that it uses the most current version of each State's paper application in accordance with forms available through the State's website and updates its system as State agencies make revisions. If States receive outdated application forms, they should follow their existing procedures for processing applications of this type.

A few States have questioned whether these applications are valid State SNAP application forms because some of the submitted applications do not include the instructions page or the voter registration form. FNS has determined that the State's obligation to begin processing an application is triggered when an application is received with a name, address, and signature. States may not deny or refuse to process a SNAP application simply because the application is missing the instructions page or voter registration form; however, FNS encourages States to work with any third-party entities that submit SNAP applications on behalf of SNAP applicants to ensure that voter registration forms are submitted with SNAP applications, if applicable.

Validity of the Signature

Additionally, some States have expressed concerns about the signature's validity. FNS considers these applications to be paper applications with a "wet signature," by which the applicant uses a mouse or finger to sign the application. This signature is considered valid and States should process the application as long as it also contains the applicant's name and address.

If State agencies received applications submitted by Intuit that contain only special characters or symbols and no valid words or information, existing procedures for processing applications of this type should be followed. If States receive applications submitted by Intuit that lack a name, address or signature, the State should follow its existing procedures for such circumstances. However, FNS strongly encourages States to contact the applicants to inform them that their application could not be processed and offer alternate ways to apply for benefits.

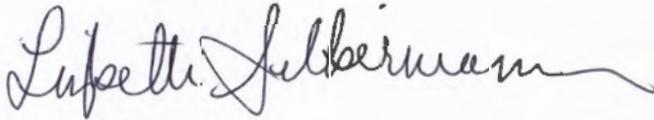
Current Situation

On January, 30, 2015, Intuit made the decision to make maintenance and refinement to its Benefit Assist system and ceased submitting SNAP applications to State agencies for an indefinite period of time. Intuit indicated a commitment to FNS that it plans to make improvements to its Benefit Assist system and release a better quality product in the future.

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FNS will continue to work in conjunction with the Regional Office to help ease administrative burdens States may face as a result of this effort. If you have further questions, please contact Sasha Gersten-Paal at sasha.gersten-paal@fns.usda.gov.

Sincerely,

A handwritten signature in cursive script that reads "Lizbeth Silberman". The signature is written in black ink and has a long, sweeping tail that extends to the right.

Lizbeth Silberman
Director
Program Development Division