



United States Department of Agriculture

Food and
Nutrition
Service

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OCT 25 2013

SUBJECT: Supplemental Nutrition Assistance Program (SNAP) and Data Sharing Under the Affordable Care Act (ACA)

TO: Regional Directors
Supplemental Nutrition Assistance Program

With the implementation of Affordable Care Act (ACA), States have requested that Food and Nutrition Service (FNS) issue guidance on how to process information received from the Federal Data Services Hub (the Hub) for jointly processed Medicaid and Supplemental Nutrition Assistance Program (SNAP) cases since Centers for Medicare & Medicaid Services (CMS) requirements provide that Social Security Administration, Department of Human Services, Internal Revenue Service, and The Employment and Income Verification System data received by it may only be used for determining eligibility for enrollment in qualified health plans and insurance affordability programs.

ACA does not change SNAP requirements regarding action on known information. As noted in the August 13, 2013, SNAP Questions and Answers on Simplified Reporting, States have the option to define what information is “known to the State agency”, and under FNS policy, must act on information that is known according to the process of their reporting method. FNS does not restrict the types of information that may be used by the State agency, or what information is considered “known”. In many cases, an eligibility worker in a State with integrated SNAP and Medicaid processing will see information received from the Medicaid case, which may or may not have been received through the Hub, as well as data from the SNAP case.

Under normal SNAP rules, a State agency could treat this information as known to the State agency, and in some situations, verified upon receipt. This means that depending on the type of information and the option the State has selected, it would act on the information. However, unless there is a change that would allow use of data received via the Hub, States should not consider any information from the Hub to be verified upon receipt for SNAP purposes.

Actively ignoring data that an eligibility worker can see poses administrative, integrity, and customer service concerns. FNS has worked with CMS diligently over the last year to resolve this issue, and understands that CMS is actively searching for ways to resolve this challenge. FNS respects the data use and contractual limitations that CMS is facing. Therefore, unless there is a change that

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would allow use of data received via the Hub, if a State is made aware of information that the State would normally consider “known to the State agency”, it may independently verify the information and then act on it per that State’s SNAP policy. FNS and CMS will continue to work toward a solution that provides improved efficiency and effectiveness of verification requirements.

If States have concerns regarding restrictions on data made available to States via the Hub, FNS recommends they consult with CMS Central Office. States may wish to work with the FNS Regional Offices to redefine what information is considered “known to the State agency”. Further details may be found in our November 24, 2008 memo: Clarifying SNAP Reporting Requirements – “Known to the State Agency”.

If you have any questions, please contact Angela Kline, Chief of the Certification Policy Branch, at angela.kline@fns.usda.gov.

A handwritten signature in black ink, appearing to read "Lizbeth Silberman". The signature is written in a cursive style and is positioned above the printed name.

Lizbeth Silberman
Director
Program Development Division