USDA Food and Nutrition Service
U.S. DEPARTMENT OF AGRICULTURE

DATE: May 14, 2025

SUBJECT: Coordination between Supplemental Nutrition Assistance Program (SNAP) State Agencies and Food Distribution Program on Indian Reservations (FDPIR) Administering Agencies

TO: All SNAP State Agencies
All FDPIR Administering Agencies
All Regions

The Food and Nutrition Service (FNS) is committed to upholding Secretary of Agriculture Rollins' priority to take swift action to minimize instances of fraud, waste, and program abuse, and to ensure American taxpayer dollars are spent with integrity and accountability. FNS is issuing this memorandum both in support of that priority and in response to requests from SNAP State agencies and FDPIR administering agencies, which include Indian Tribal Organizations (ITOs) and State agencies (SAs) for additional guidance on preventing dual participation and ensuring comparable disqualifications are applied in SNAP and FDPIR.

SNAP provides nutrition benefits to low-income individuals and families that are used at authorized retail stores to purchase eligible food. FDPIR provides USDA Foods to income-eligible households living on Indian reservations and to Native American households residing in designated approved areas near reservations or in Oklahoma.

While eligible households may receive benefits from SNAP or FDPIR, they may not participate in both programs in the same month. Section 4(b)(2)(C) of the Food and Nutrition Act of 2008 (the Act) and regulations at 7 CFR 281.1(c) and 7 CFR 253.7(e) maintain that no household shall be allowed to participate simultaneously in SNAP and FDPIR. Each program is required to ensure that applicants are aware of the prohibition and must develop a method to detect dual participation.

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At a minimum, this method must involve monthly review of current lists of households certified for each program. In addition, Section (4)(b)(3) of the Act and regulations at 7 CFR 273.11(k) and 7 CFR 253.7(f) require that households disqualified from FDPIR for an intentional program violation receive a comparable disqualification in SNAP. Regulations at 7 CFR 253.7(f)(1)(ii) also require that households disqualified from SNAP for an intentional program violation receive a comparable disqualification in FDPIR. FNS currently includes these requirements in the Federal management evaluation review process for FDPIR and plans to include them in SNAP reviews starting in fiscal year (FY) 2026.

SNAP and FDPIR agencies serving the same geographic areas must coordinate to detect and prevent dual participation and apply comparable disqualifications. While the current process for coordination may involve the use of general call centers, FNS strongly encourages SNAP State agencies and FDPIR administering agencies to designate a point of contact and develop a direct phone line to facilitate coordination.

As a best practice, these agencies should enter into a Memorandum of Understanding (MOU) or an Inter-Governmental Agreement to establish mutually agreed upon procedures while ensuring recipient household information is protected in accordance with 7 CFR 272.1(c) and 7 CFR 253.5(a)(2)(vii). FNS encourages agencies to modernize and streamline procedures to make them manageable for both agencies so that eligible households can quickly and easily access FNS nutrition assistance. FNS recommends SNAP and FDPIR agencies work together to explore the following actions:

- grant read-only access to their systems/databases;
- run a same-day dual participation check whenever needed;
- develop a shared portal that both agencies can use to verify participation; or
- establish another process that allows for timely checks and is mutually agreed upon by both agencies.

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Additionally, FNS encourages SNAP State agencies and FDPIR administering agencies to develop staff training materials outlining the prohibition of dual participation and the requirement to apply comparable disqualifications.

If a SNAP State agency or FDPIR administering agency identifies dual participation, the agency must impose the appropriate disqualification and notify the other program. In addition, the program that most recently certified the household for benefits is responsible for establishing a claim against the household. The other program is not required to establish a claim.

This memorandum underscores Secretary Rollins' commitment to program integrity and accountability and provides guidance on coordination between SNAP State agencies and FDPIR administering agencies to prevent dual participation and ensure comparable disqualifications are applied in SNAP and FDPIR. FNS sincerely appreciates the tremendous efforts made by SNAP State agencies and FDPIR administering agencies to provide access to healthy foods in Indian country.

Please reach out to your FNS Regional Office for technical assistance if you would like additional support for the coordinated method preventing dual participation.

Sincerely,

RONALD WARD

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