



Food and
Nutrition
Service

1320 Braddock Place
Alexandria, VA
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DATE: November 10, 2022

SUBJECT: Federal Access to State Systems for Quality Control Purposes, Quality Control Policy Memo 23-02

TO: All SNAP State Agencies
All Regions

The Supplemental Nutrition Assistance Program (SNAP) Quality Control (QC) system measures the accuracy of benefits delivered by the program and helps safeguard the taxpayer investment by ensuring that the Program operates as intended. To support the Food and Nutrition Service's (FNS) ability to provide effective and efficient oversight of SNAP, State agencies must grant access to all State SNAP records and information systems that contain these records, as required in Section 16(c)(4) of the Food and Nutrition Act of 2008 (the Act), as amended. The purpose of this memorandum is to clarify how Federal access to State systems will be monitored by FNS.

Oversight of Federal Access to State Systems for Quality Control Purposes

Starting in FY 2023, FNS will examine Federal access to State systems during SNAP QC Management Evaluation (ME) reviews to ensure State agencies are in compliance with statutory and regulatory requirements. If FNS finds that Federal reviewers do not have remote access to the relevant State records and systems, and the State agency is not currently working in good faith with FNS to provide the required access, the State agency will receive an ME finding for non-compliance and be required to initiate corrective actions. As a reminder, FNS payments to State agencies for cost sharing for computerization under section 16(g) of the Act may be impacted if a State agency does not provide, or take steps to provide, FNS with access to the relevant State records and systems. FNS has previously taken steps to support State compliance and stands ready to continue working with States to ensure that access can be established and maintained.

Background

In recent years, FNS took several measures to strengthen and improve the integrity of the SNAP QC system, in part due to legislative changes included in the Agriculture Improvement Act of 2018. For example, FNS made regulatory requirements for systems access consistent with requirements in the Act with publication of the SNAP: Non-Discretionary QC Provisions of the Agricultural Improvement Act of 2018 interim final rule on August 13, 2021. This rule requires State agencies to provide FNS with access, including remote access, to State agency records and the systems in which those records are contained, for QC purposes, as described at 7 CFR 275.2(d).

This includes complete access to both the records that are used in the administration of SNAP, including but not limited to the records contained within certification and EBT systems, and the information systems which contain those records.

To assist State agencies in achieving compliance with this requirement, FNS has provided various resources and types of technical assistance. For example, FNS QC Memoranda 16-02 and 17-01 clarified the importance of collaboration between FNS and State agencies to create remote-accessible, read-only user roles for Federal reviewers. In addition, FNS worked with State agencies to establish procedures for the creation and management of the required Federal user roles. FNS assistance included convening meetings to address technology difficulties, creating a virtual environment to facilitate Federal remote access to State systems, and publishing IT instructional guides to obtain secure access. The FNS State Systems Office has also provided guidelines in the FNS Handbook 901 and SNAP System Integrity Review Tool to ensure State SNAP systems incorporate remote access for Federal QC reviewers.

Separately, FNS also worked with the Social Security Administration (SSA) to address privacy concerns in granting FNS access to State systems that contain SSA data. FNS and SSA's Office of Data Exchange, Policy Publications, and International Negotiations (ODEPPIN) and Office of General Counsel (OGC) determined that FNS may be granted access to State systems that include SSA data. At the same time, SSA clarified that State agencies cannot provide FNS with raw data files received from SSA or direct query access to SSA's system.

FNS appreciates the State agency's commitment to ensuring FNS can provide effective and efficient oversight of SNAP. If a State agency needs assistance in providing FNS access to their records and systems, please reach out to the respective FNS Regional Office.

Sincerely,

/s/

Rachel Frisk
Director
Program Administration and Nutrition Division