



Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE

DATE: February 15, 2024

SUBJECT: Supplemental Nutrition Assistance Program – Online Application Policy Clarification

TO: All SNAP State Agencies
All Regions

The Food and Nutrition Service (FNS) has seen an increased number of questions regarding online application policy from State agencies, Regional Offices, and advocates during systems development, Management Evaluations, and other venues. The purpose of this memo is to reiterate and clarify existing policy. This clarification applies to both initial and recertification applications.

Right to File with only Name, Address, and Signature

Federal law provides applicants with the right to file a SNAP application providing only name, address, and signature. Therefore, State agencies must accept and establish a filing date for any SNAP application that includes a name, address, and signature, even if other questions on the application form are incomplete. State agencies must consider such applications as “filed” and provide benefits from the filing date for eligible households.

For online applications, this means that State agencies can encourage but *cannot require* applicants to complete any additional fields in order to advance through and/or file/submit the application. The online application must include the name, address, and signature fields on one of its initial screens, and questions other than name, address, and signature must be optional. One option to meet this requirement is by including a “submit now” button immediately following the name, address, and signature fields. State agencies should also consider including a “submit” button on every screen or at frequent points as the applicant advances through the online application to prevent applicants from having to advance through every screen to submit.

These requirements apply to all types of SNAP applications, including multiprogram applications, paper applications, or mobile applications and apply regardless of other means of applying (such as the availability of paper applications). For example, a State is not permitted to require additional information on its online application based on the reasoning that households not wanting to provide more than name address and signature can apply via paper.

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Notification of Right to File

Federal law also requires that the application contain a notification on or near the front page that applicants have the right to file an application with only name, address, and signature. The notification must be in plain and prominent language. For online applications, State agencies may accomplish this by placing the notification on an initial page. These requirements apply to all types of SNAP applications, including multiprogram applications, regardless of modality (paper applications, online applications, or mobile applications).

Identity Verification

State agencies may offer digital identity verification (or remote identity proofing, or RIDP) as a method of identity verification, but it must be optional. Digital identity verification can include knowledge-based verification, such as answering questions based on government records and credit reports, or evidence-based verification, such as providing a digital copy of a government-issued ID or proving control of a device, account, or address known to be associated with an identity. Knowledge-based verification systems are increasingly vulnerable to security threats. If digital verification is to be used, SNAP strongly encourages the use of evidence-based verification systems to prevent identity fraud.

Applicants must be permitted to file an application prior to verifying their identity and must be given the option to verify their identity through traditional means such as documentary evidence or collateral contact. State agencies must not require identity verification before the applicant submits the application even if the applicant has chosen to set up an account. Requiring identity verification before an applicant submits the application would violate Right to File policy.

Mobile Applications

State agencies may offer a mobile application for use on a mobile device like a phone or tablet that an applicant may choose to download and use. SNAP application forms on a mobile platform must follow the requirements listed above for Right to File. Therefore, once in the mobile SNAP application form, State agencies must not require more than name, address, and signature and must not require use of identity verification in order to submit an application. Applicants must be able to apply and recertify for SNAP without any other information beyond name, address, and signature. State agencies may still offer access to a portal in the mobile application, but State agencies must not require additional information, such as an e-mail address, to submit a SNAP application form.

Regional Offices should work with State agencies to ensure compliance with Right to File regulations. The Modernization and Integration Branch (MIB) will assist Regional Offices in offering technical assistance to State agencies to help with specific situations and questions.

State agencies should contact their FNS Regional Office representatives with any questions.

Moira Johnston
Signed Memo on File
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Supplemental Nutrition Assistance Program