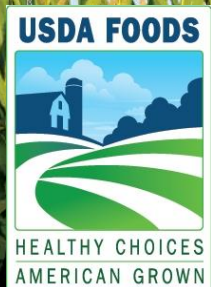


FOOD DISTRIBUTION PROGRAM ON INDIAN RESERVATIONS

– HOUSEHOLD CERTIFICATION TRAINING –



MODULE 1

Applicant choice to participate in FDPIR or
Supplemental Nutrition Assistance Program (SNAP)

Introduction:

- » The Food Distribution Program on Indian Reservations (FDPIR) is a federal program that provides USDA Foods to low-income households living on Indian reservations, in designated areas near reservations, and in the State of Oklahoma.
- » FDPIR Household Certification Training will help Indian Tribal Organization (ITO) and State agency certification workers and their supervisors successfully administer the program.
- » The training is comprised of nine modules, designed to be taken in any order. At the end of each module is a short quiz you may take to test your knowledge of the key learning points covered in the module. When you finish all nine modules, you may test your knowledge of the entire training by taking the post-test.
- » The knowledge gained in this training will help you provide the best support possible for current and potential FDPIR participants.

Acronyms Used in Module

The following acronyms appear in this module:

FDPIR – Food Distribution Program on Indian Reservations

FNS – Food and Nutrition Service

ITO – Indian Tribal Organization

SNAP – Supplemental Nutrition Assistance Program

USDA – United States Department of Agriculture

Learning Module 1:

Applicant Choice to Participate in FDPIR or Supplemental Nutrition Assistance Program (SNAP)

» Refer to FNS Handbook 501 for more information about topics covered in this module.

» On each slide in this module, you can find the specific section in the handbook where the topic is covered in greater detail.

Learning Objectives:

After completing this module, learners will:

- » Be able to advise households that they may choose to participate in either FDPIR or SNAP.

- » Understand the prohibition on household participation in FDPIR and SNAP in the same month.

- » Know the exceptions to the prohibition on household participation in FDPIR and SNAP in the same month.

- » Know the requirements on controls that must be in place to detect/prevent simultaneous participation in FDPIR and SNAP.

- » Understand the procedures for households switching from one program to another.

Household Choice

Source: FNS Handbook 501, Section 5400

- » SNAP is a federal program that was formerly known as the Food Stamp Program. It may have a different name in your state. SNAP helps low-income individuals and families buy the food they need for good health through the use of an electronic benefits transfer (EBT) card, much like an ATM card.
- » FDPIR is considered an alternative nutrition assistance program to SNAP. Both programs may be available in the same area.
- » Eligible households living in areas where both FDPIR and SNAP are available may choose to participate in either program, but not both in the same month.

Prohibition on Simultaneous Participation in FDPIR and SNAP

Source: FNS Handbook 501, Section 5410

» Section 4(b) of the Food and Nutrition Act of 2008 (codified in the Agricultural Act of 2014, the Farm Bill) prohibits households from participating simultaneously in FDPIR and SNAP.

» Households cannot participate in FDPIR **AND** SNAP in the same month, with the following exceptions:

- Households receiving SNAP Disaster Benefits
- SNAP Households Eligible for Zero SNAP Benefits

» The exceptions identified above are the **ONLY** exceptions to the prohibition on simultaneous participation in FDPIR and SNAP.

Exception: SNAP Disaster Benefits

Source: FNS Handbook 501, Section 5410

» A household that has received its FDPIR benefits for the month may be eligible to receive SNAP disaster benefits later that month if the household is affected by a Presidentially-declared disaster.

Exception: SNAP Households Eligible for Zero SNAP Benefits

Source: FNS Handbook 501, Section 5410

- » Under certain circumstances a household may be certified under SNAP but determined eligible for **ZERO** SNAP benefits in one or more months.
- » For FDPIR eligibility purposes, SNAP households are not considered to be participating in SNAP in any month in which they are eligible for zero SNAP benefits. Therefore, SNAP households can apply for and receive FDPIR benefits, if otherwise eligible, for a month in which they are eligible for zero SNAP benefits.
- » The FDPIR certifier must assign the household a **one-month** certification period. Prior to certifying the household for FDPIR benefits, the certifier must verify with the local SNAP office that the household is eligible for zero SNAP benefits that month.
- » If a SNAP household is eligible for zero SNAP benefits in consecutive months, the household may reapply for FDPIR for each month that it is eligible for zero SNAP benefits. Prior to certifying the household for each month, the FDPIR certifier must verify with the local SNAP office that the household is eligible for zero SNAP benefits.

Case Study 1 Scenario:

A household is determined to be eligible for zero SNAP benefits in the month of May. The household applies for FDPIR on May 5. The FDPIR certifier verifies with the SNAP office that the household is eligible for zero SNAP benefits in May, and determines that the household is otherwise eligible for FDPIR. The household receives USDA Foods under FDPIR on May 7.

In June, the household reports again being determined to be eligible for zero SNAP benefits. The household reapplies for FDPIR on June 3.

What action must the certifier take before certifying the household to receive FDPIR benefits in June?

Case Study 1 Solution:

The certifier must verify that the household is eligible for zero SNAP benefits in June.

The FDPIR certifier verifies with the SNAP office that the household is eligible for zero SNAP benefits in June, and determines that the household is otherwise eligible for FDPIR. The household receives USDA Foods under FDPIR on June 5.

Requirement to Prevent/Detect Simultaneous Participation in FDPIR and SNAP

Source: FNS Handbook 501, Section 1370

- » Simultaneous participation in FDPIR and SNAP is an abuse of program regulation. ITOs and State agencies must develop procedures for preventing/detecting simultaneous participation in FDPIR and SNAP.
- » The ITOs/State agencies must coordinate with the appropriate SNAP agency or agencies in developing controls to detect and prevent simultaneous participation in both programs, and are encouraged by FNS to develop a Memorandum of Agreement with the SNAP agencies on the procedures to be used by each agency.
- » At a minimum, the procedures must employ lists of currently certified households provided by and to the appropriate SNAP agency on a monthly basis.
- » The ITO/State agency may also employ computer checks, address checks, and telephone calls to determine if the FDPIR applicant or participating household is also participating in SNAP.

Prohibition on Simultaneous Participation in Multiple FDPIR Programs

Source: FNS Handbook 501, Section 1370

- » In addition to being prohibited from simultaneous participation in SNAP and FDPIR, households are also prohibited from participating in more than one FDPIR program in the same month (e.g., two FDPIR programs that are in close proximity geographically, but administered by different ITOs).
- » For example, a household cannot participate in the FDPIR program administered by the Cherokee Nation of Oklahoma and the FDPIR program administered by the Muscogee (Creek) Nation in the same month.
- » Individuals cannot participate as a member of more than one FDPIR household in the same month.

Household Option to Switch from FDPIR to SNAP or from SNAP to FDPIR

Source: FNS Handbook 501, Sections 5420, 5430

- » In areas where SNAP and FDPIR are both available, households may switch from FDPIR to SNAP, or from SNAP to FDPIR during their certification period.
- » To do this, the household must request termination of participation in the program in which it is currently participating. The notification may be verbal or in writing.

ITO/State Agency Action on Request to Terminate Participation in FDPIR

Source: FNS Handbook 501, Section 5440

- » The certifier must act on a household's request for termination to ensure that the household's participation in FDPIR is terminated effective on the last day of the month in which the request was made.
- » For example, if a household requests termination on October 15th, the certifier must ensure the termination is effective on October 31st.

Eligibility for FDPIR Following Termination of Participation in SNAP

Source: FNS Handbook 501, Section 5440

- » Termination of eligibility under SNAP is handled the same way as FDPIR.
- » That is, the termination of SNAP eligibility would not be effective until the last day of the month in which the request was made.
- » If a SNAP household wants to switch to FDPIR, it would not be eligible to participate in FDPIR until the month after its SNAP eligibility was terminated.
- » The FDPIR certifier **MUST** verify the household's termination of SNAP eligibility before he or she can certify the household's participation in FDPIR.

Case Study 2 Scenario:

A household receives SNAP benefits on August 1 and then requests that its SNAP case be closed on August 15, because the household wants to switch to FDPIR. The household applies for FDPIR on August 20, and the FDPIR certifier verifies with the SNAP office that the household requested termination of participation in SNAP. The termination will be effective August 31.

Is the household eligible for FDPIR in August?

Case Study 2 Solution:

No. The household is not eligible for FDPIR in August because it was still eligible to participate in SNAP during the month of August AND it received SNAP benefits that month.

When will the household be eligible for FDPIR?

September 1.

Ineligibility for FDPIR if Termination of SNAP Participation is Not Effective on the First Day of the Month

Source: FNS Handbook 501, Section 5420

- » If a household is certified to receive SNAP benefits on the first day of the month, the household would not be eligible to receive FDPIR in that month.
- » Instead, a household certified to receive SNAP benefits as of the first day of the month remains eligible for SNAP throughout that month.

Case Study 3 Scenario:

A household requests that its SNAP case be closed on September 30 because the household wants to switch to FDPIR.

The household applies for FDPIR on October 3 and the certifier verifies with the SNAP office that the household's request for termination was not processed until October 2 and SNAP benefits were made available to the household on October 1.

Is the household eligible to participate in FDPIR in October?

Case Study 3 Solution:

No. The household would not be eligible for FDPIR in October because it was still eligible to participate in SNAP as of the first day of the month of October.

When will the household be eligible for FDPIR?

The household would be eligible to participate in FDPIR in November, the month after participation in SNAP was terminated.

Eligibility for FDPIR in the Month of Request for Termination of Participation

Source: FNS Handbook 501, Sections 5420, 5440

- » If a household requests termination of its FDPIR eligibility so it can switch to SNAP, the household's request to terminate would not impact the household's eligibility for FDPIR for the remainder of the month.

- » If a household is certified to participate in FDPIR on the first day of the month, it remains eligible for FDPIR throughout that month.

Case Study 4 Scenario:

A household requests termination of FDPIR on May 5.

When will it's eligibility be terminated?

Case Study 4 Solution:

The household will be eligible to participate in FDPIR and pick up its USDA Foods during the entire month of May since the termination will not be effective until the last day of May.

When could SNAP benefits begin?

The household's SNAP benefits could not begin until the first day of June.

Conclusion:

- » Eligible households living in areas where both FDPIR and SNAP are available may choose to participate in either program.
- » Households may not participate in both FDPIR and SNAP during the same month with the following two exceptions:
 - The household was affected by a Presidentially-declared disaster after receiving its USDA Foods and is eligible to receive SNAP Disaster Benefits.
 - The household qualifies for ZERO SNAP benefits.
- » If a household requests termination of FDPIR, participation is terminated on the last day of the month in which the request was made.
- » Households certified to receive FDPIR benefits on the first day of the month remain eligible for FDPIR throughout the month.

Conclusion (continued):

- » A household certified to receive SNAP benefits is not eligible to participate in FDPIR until the month after its SNAP participation is terminated.

- » If a household is certified to receive SNAP benefits on the first day of the month, the household would not be eligible to receive FDPIR in that month.

- » The FDPIR certifier must verify termination of SNAP benefits before certifying a household for FDPIR.

- » If you are uncertain about a household's eligibility to switch programs, please speak with your supervisor.

Module 1 Quiz

Instructions:

The following quiz will test your knowledge of the applicant's choice to participate in FDPIR or SNAP.

1. Which of the following is NOT correct?

- A. FDPIR is an alternative nutrition assistance program to SNAP, so eligible households living in areas where both FDPIR and SNAP are available may choose to participate in either program.
- B. A household that has received its FDPIR benefits for the month may be eligible to receive SNAP disaster benefits later that month if the household is affected by a Presidentially-declared disaster.
- C. ITOs and State agencies must develop procedures for preventing and detecting simultaneous participation in FDPIR and SNAP.
- D. Households and individual household members may participate in more than one FDPIR program in the same month.

2. True or False? A SNAP household qualifies for zero SNAP benefits in April. The household applies for FDPIR benefits on April 4. The household would not be eligible for FDPIR benefits in April.

A. True

B. False

3. True or False? If a household wants to switch from SNAP to FDPIR, the FDPIR certifier must ensure the household's participation in SNAP is terminated effective on the last day of the month in which the request was made.

A. True

B. False

4. A SNAP household receives its SNAP benefits on October 1. The household requests that its SNAP case be closed on October 15, because it wants to switch to FDPIR. When will the household be able to receive FDPIR benefits?

- A. October 15**
- B. October 30**
- C. November 15**
- D. November 1**

5. True or False? A household requests termination of its FDPIR eligibility on May 6, so it can switch to SNAP. The household may pick up its May FDPIR issuance between May 6 and May 31.

- A. True**

- B. False**

6. A household requested that its SNAP case be closed on November 30, but the FDPIR certifier verifies with the SNAP office that the household's eligibility was not terminated until December 5. When can the household begin to receive FDPIR benefits?

- A. December 1**
- B. January 1**
- C. December 6**
- D. November 30**