

## Handbook 901 v2.5 Change Log

Previous Section	Action Taken	New Section (As Applicable)
<b>ALL PAGES</b>	Added disclaimer at the bottom of every page in accordance with Executive Order 13891 - Promoting the Rule of Law Through Improved Agency Guidance Documents: "Guidance documents lack the force and effect of law, unless expressly authorized by statute or incorporated into a contract. USDA may not cite, use, or rely on any guidance that is not available through their guidance portal, except to establish historical facts."	ALL PAGES
<b>LAST PAGE</b>	Added USDA is an equal opportunity provider, employer, lender statement.	LAST PAGE
<b>1.5.1.1</b>	Table 1 was updated to reflect an increase in the WIC MIS PAPD threshold from \$500,000 to \$1,000,000.	N/A
<b>1.5.1.1</b>	The WIC EBT submission threshold in Table 1 was updated as follows: "For all projects requesting FFP for new technology."	N/A
<b>1.5.1.2</b>	Table 2 was updated to reflect increase in the WIC MIS IAPD threshold from \$500,000 to \$1,000,000.	N/A

<b>Previous Section</b>	<b>Action Taken</b>	<b>New Section (As Applicable)</b>
<b>1.5.1.2</b>	The WIC EBT submission threshold in Table 2 was updated as follows: "For all projects requesting FFP for new technology."	N/A
<b>1.5.1.3</b>	The following statement was deleted: "In addition, all contract amendments must be submitted. Contract amendments that cumulatively exceed 20% of the base contract require FNS prior approval, including amendments to M&O contracts." The purpose of this section is to focus on when an APD is needed, not when amendments must be submitted. We provide more detailed information about amendments in section 4.2.4.3.	N/A
<b>1.5.2.2</b>	This section was updated to reflect an increase in the WIC MIS APD threshold from \$500,000 to \$1,000,000.	N/A
<b>1.5.3</b>	Section was updated to indicate that its content applies to both WIC and SNAP EBT.	N/A
<b>1.5.4</b>	This section, along with Table 4, were updated to reflect the new WIC MIS APD project threshold of \$1,000,000 and updates to other notification and/or approval thresholds when full APD is not required.	N/A

<b>Previous Section</b>	<b>Action Taken</b>	<b>New Section (As Applicable)</b>
<b>1.5.4</b>	The following language was added below Table 4: “Non-competitive acquisitions below \$250,000 for WIC projects are allowable without prior approval as long as they meet the State agency’s procurement requirements. FNS will require justification for any sole source procurements that exceed this amount. The State agency will be responsible for any non-competitive costs incurred without prior approval from FNS, and these costs will be subject to disallowance.”	N/A
<b>1.10.2</b>	Removed reference and endnote #7 link to OMB Circular A-133. Replaced with reference and endnote #7 link to 2 CFR 200.	N/A
<b>3.2.2.2</b>	Updated WIC MIS APD project threshold to \$1,000,000.	N/A
<b>3.2.3.3</b>	WIC specific callout box denoting that “The review period for WIC EBT Planning APDs is 30 days, not 60 days” has been removed as the guidance is no longer valid.	N/A
<b>3.3.1.3</b>	WIC EBT was added to the first callout box within this section. “For SNAP and WIC EBT, a PAPD is only required if the State agency is exploring new technology or expects to incur excessive planning costs. Otherwise, a PAPD for SNAP or WIC EBT is not required.”	N/A

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<b>3.3.1.3</b>	Updated Table 9 to indicate that a PAPD is not applicable for WIC EBT.	3.3.1.4
<b>3.3.1.3</b>	The language in the third callout box was updated to read as follows: "After a State agency implements a WIC EBT delivery method statewide, the State agency must submit an IAPD a replacement WIC EBT delivery method based upon the thresholds described in chapter 1.0, section 1.5.1."	3.3.1.4
<b>3.3.1.7</b>	Section 3.3.1.7 WIC EBT Planning Activities and all its contents have been removed from Handbook 901 v2.5 as this requirement is no longer applicable.	N/A
<b>3.3.2.3</b>	Updated Table 10 to reflect updated WIC and WIC EBT IAPD document requirements.	N/A
<b>3.3.2.5</b>	Removed second callout box in this section as the guidance no longer applies to WIC EBT.	N/A
<b>3.3.2.6</b>	The IAPD for Joint WIC IS and EBT Projects section has been removed as the submission timing is different for each project type.	N/A

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<b>3.3.3.1</b>	The callout box was updated to include WIC EBT. “Annual APDUs are not required for SNAP or WIC EBT. An “APDU As-Needed” is required if costs will exceed the approved budget, the contract period changes from what is covered by the IAPD, or there is a significant change in the services provided.”	N/A
<b>3.3.3.3</b>	Table 11 has been updated to indicate that the Annual APDU requirements are not applicable to WIC EBT and SNAP EBT.	N/A
<b>3.3.4.3</b>	Updated section based on new guidance as to when an APDU As-Needed is required for a WIC MIS or SNAP EBT project.	N/A
<b>3.3.4.3</b>	The callout box has been updated to read as follows: “For WIC EBT, IAPDU As-Needed updates are only required once the total projected costs of the project exceed the approved IAPD amount.”	N/A
<b>3.5.6</b>	Removed WIC EBT Change Management Plan (WIC EBT) section as the requirement no longer applies.	N/A
<b>3.5.7</b>	Removed WIC EBT Clinic Management Plan section as the requirement no longer applies.	N/A

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<b>3.5.11</b>	Removed Cost Analysis section as the requirement no longer applies.	N/A
<b>3.5.15</b>	The EBT Disaster Recovery Plan section was updated to include WIC EBT.	3.5.12
<b>3.5.20</b>	Removed Pilot and Statewide Expansion Retailer Enablement Plan section as the requirement no longer applies.	N/A
<b>3.5.24</b>	Removed Quality Management Plan (WIC EBT) section as the requirement no longer applies.	N/A
<b>3.5.27</b>	Removed Risk Management Plan (WIC EBT) section as the requirement no longer applies.	N/A
<b>3.5.28</b>	Callout box removed.	3.5.22
<b>3.5.30</b>	Removed State Agency / Contractor Assurances (WIC EBT) section as the requirement no longer applies.	N/A
<b>4.2.4.3</b>	Callout box has been updated as follows: “The State agency must get prior FNS approval for SNAP MIS and SNAP EBT contract amendments involving cost increases that cumulatively exceed 20% of the base contract cost. All SNAP contract amendments, regardless of cost, must be sent to FNS for recordkeeping purposes. WIC MIS and WIC EBT sole source amendments over	N/A

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	\$250,000 that extend a contract require formal FNS review and response. All WIC MIS and EBT contract amendments, regardless of cost, must be sent to FNS for recordkeeping purposes”	
<b>4.2.4.3</b>	Section has been updated to address WIC MIS and WIC EBT procurement threshold requirements.	N/A
<b>4.3.1</b>	Updated broader section and Table 16 and 17 to incorporate changes in WIC and WIC EBT competitive and noncompetitive procurement thresholds.	N/A
<b>5.3.1.7</b>	Removed FNS Requirements for WIC EBT Systems section as the requirement no longer applies.	N/A
<b>5.3.2.4</b>	Removed WIC EBT System Alternatives Analysis section as the requirement no longer applies.	N/A
<b>5.3.3</b>	Removed callout box referencing Cost Benefit Analysis for WIC EBT.	N/A
<b>8.2.3</b>	The final paragraph of this section was updated to read as follows:  “FNS will not disallow costs that were not subject to approval. <sup>66</sup> See section 4.2.4.3 for additional information about contract amendments.”	N/A

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<b>A8.2</b>	Appendix 8, "Sample IAPD/U Budget" has been updated to clarify the information that must be included within an IAPD/U budget.	N/A
<b>A16</b>	References to the "Go/No-Go Decision Checklist" were removed. Instead, HB 901 notes that a SNAP Go/No-Go Checklist and a WIC Go/No-Go Checklist have been posted to the FNS SSO web page. The revised version of HB 901 refers to the Go/No-Go Decision Process in Section 6.4.7.	<b>N/A+*</b>

Disclaimer: Many of the changes made throughout the document were to clean up punctuation, address minor word changes, fix broken links, and/or append callout box images to more clearly reflect the content's applicability to one or more programs.