



Date: December 30, 2024

Subject: Quality Control (QC) Procedural Clarifications for the use of Sections 751 and 752 in the FNS Handbook 310
QC Policy Memo 25-03

To: All SNAP State Agencies
All Regional SNAP Directors

This memo provides clarification on the application of Sections 751 and 752 of the FNS Handbook 310. The clarifications reflect long-standing review procedures and information previously provided in response to policy inquiries and during trainings.

Clarifications regarding the use of Sections 751 and 752

Section 751-Determining a filed mandatory report form is complete

To determine if a filed mandatory report form is complete, the QC reviewer (QCR) must base their evaluation on the design of the form and whether the household responded to all household circumstance questions required by SNAP policy at [7 CFR 273.12\(a\)\(1\)\(i\)-\(viii\)](#).

If the QCR identifies that a mandatory report was incomplete, the QCR must determine if the agency otherwise obtained the missing required information prior to issuing benefits for continued participation. If the agency obtained the missing required information, Section 751 does not apply.

Impact of form design when determining if a filed form is complete:

- If a form's instructions require the household to only respond when they had a change in household circumstances, the QCR must consider any unanswered required questions as a response of "no change."
- A form is not considered incomplete under Section 751 when categorically eligible (CE) households do not answer questions that are not applicable to CE households.
- A form is not considered incomplete under Section 751 when a household files a combined program mandatory report form (e.g. a form for SNAP and Temporary Assistance for Needy Families-TANF benefits), answers all the questions required for SNAP, but does not answer questions specified for the other program (TANF).

Section 752-Reviewing a case when a recertification application is filed, but is missing

A case is not considered ineligible under Section 752 when the case record indicates the household filed an application for recertification, but it is missing from the case record, consistent with Section 751 procedures for missing mandatory report forms. The QCR must follow the procedures in Section 322 to determine the information from the missing

recertification application. All missing applications must be documented as deficiencies in the review record and reported to the local agency after transmission to FNS.

Procedural deficiencies related to Sections 751 and 752

The household was not interviewed as part of the certification action

The Food and Nutrition Act, as amended (the Act), and SNAP regulations require State agencies to conduct interviews for certain certification actions. However, consistent with long-standing review procedures, the occurrence or absence of an interview does not automatically determine ineligibility for QC review purposes. When identified, QCRs must continue their review, but document this procedural deficiency in the review record and report the information to the local agency after transmission to FNS.

Clarification when the household filed an alternative form to continue SNAP benefits

When the household files, or the State agency processes, an alternative form for a recertification or to comply with reporting requirements at [7 CFR 273.12](#), the case is not automatically determined ineligible for QC review purposes. When identified, QCRs must continue their review, but document this procedural deficiency in the review record and report the information to the local agency after transmission to FNS.

Regional Offices should direct questions regarding these clarifications through the existing inquiry procedures. State agencies should direct questions regarding these clarifications to their Regional Office contacts.

Sincerely,

John McCleskey for
Rachel Frisk
Director
Program Administration and Nutrition Division
Supplemental Nutrition Assistance Program