



Food and  
Nutrition  
Service

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DATE: July 27, 2016

SUBJECT: Supplemental Nutrition Assistance Program – Review of Major Changes in Program Design and Management Evaluations – Additional Clarifying Guidance

TO: All Regional Directors  
Supplemental Nutrition Assistance Program

This memorandum provides additional implementation guidance regarding the final rule titled the Supplemental Nutrition Assistance Program (SNAP) Review of Major Changes in Program Design and Management Evaluations (“Major Changes Rule”) published in the *Federal Register* on January 19, 2016. Previous guidance was issued on February 11, and April 22, 2016. All guidance is available at: <http://www.fns.usda.gov/snapmajorchangesrule>.

As a reminder, the Major Changes Rule went into effect on March 21, 2016, and State agencies must now be in compliance with its provisions. Changes to the definitions of project areas that impact the requirements for State Management Evaluations are effective October 1, 2016.

The Food and Nutrition Service (FNS) has received requests for clarification from States that are in the process of implementing new eligibility systems to replace their legacy systems. For instance, a State may be implementing a new integrated multi-benefit eligibility system, and the non-SNAP components (e.g. Medicaid or Temporary Assistance for Needy Families) will be implemented prior to the SNAP components. As stated in our April 22, 2016, memo, “implementation” is defined as when a major change is first put into effect or operational. States have requested clarification on what FNS considers the “implementation” date of the system for the purposes of the Major Changes Rule.

For Major Changes Rule notification and reporting purposes, FNS is concerned only with the components of the eligibility system related to SNAP. For instance, if Medicaid cases and SNAP cases are being converted into the new eligibility system at different times, the SNAP case conversion date is considered the date of the implementation of a major change from FNS’s perspective. For the purposes of this memo, case conversion occurs when the new eligibility system has fully gone live for SNAP and is the system of record for SNAP cases.

FNS understands the roll-out of these systems may be considered by States to be a gradual, “phased” process incorporating various components of SNAP and Medicaid. However, as stated in Question 4 of our guidance from April 22, FNS considers a package of changes different than one change occurring in phases. To clarify the answer to Question 4, a new eligibility system implementation is not automatically considered one single major change occurring in phases for the purpose of this rule. For instance, a new eligibility system implementation may have document imaging capabilities added as one piece of it. Document imaging is a functionally different piece of system implementation than case conversion from a legacy system to a new eligibility system. Both of these, while components of a system implementation, have vastly different impacts on program access.

Therefore, both document imaging and SNAP case conversion are considered separate individual major changes under the rule at 275.12, or part of a package of changes. These two actions are not different phases of one major change. One major change occurring in phases is a roll out of an online application in different geographic locations. A major change with different phases may be best considered to be occurring over time in geographic or temporal spread as the State expands the change.

FNS understands States have been reporting to and working with FNS on the Advance Planning Document (APD) process and working in close concert with Federal partners to prepare for the rollout of integrated eligibility systems. The APD process remains critical to ensuring a smooth rollout of new systems and is distinct from the purposes and requirements of the Major Changes rule. The intent of the Major Changes rule is to allow FNS to monitor ongoing aspects of program access, such as timeliness and allow for FNS to work more closely with and provide technical assistance to States undergoing a significant change in program operations.

Should you have any further questions, please contact us at  
[SNAPMajorChange@fns.usda.gov](mailto:SNAPMajorChange@fns.usda.gov).

Sincerely,

*/s/ Original Signed on File*

Lizbeth Silbermann  
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