



March 19, 2009

**United States  
Department of  
Agriculture**

**Food and  
Nutrition  
Service**

3101 Park Center Dr  
Alexandria, VA  
22302-1500

To: Regional SNAP Program Directors  
All Regions

Subject: American Recovery and Reinvestment Act  
Clarifications to Program Accountability and Administration Provisions  
Quality Control: Questions and Answers #1

Attached are questions and answers in response to issues raised by the States, through various discussions, concerning SNAP provisions of the American Recovery and Reinvestment Act of 2009 (P.L. 111-5), which was enacted on February 17, 2009. Please direct any questions to the appropriate regional contact in the Quality Control Branch.

/s/

Andrea Gold  
Acting Director  
Program Accountability and Administration Division

Attachment

**Supplemental Nutrition Assistance Program  
American Recovery and Reinvestment Act**

**Quality Control  
Questions and Answers**

**Sec. 101(b) Requirements for the Secretary (Administrative Requirements)**

**Question 1.** What type of error in implementing the new benefit levels will be excluded under the hold-harmless provision in Section 101(b)(3) of the ARRA that eliminates the 120-day limitation on implementation errors contained Section 16(c)(3)(A) of the Food and Nutrition Act of 2008?

**Answer** Any variances resulting from mistakes in the amount of benefits authorized for a household resulting from the application of the new benefit levels will be excluded. That is, if the State miscalculates the new allotments or mis-enters the new allotments as part of the mass change, variances resulting from that incorrect number would be excluded. Errors made in determining eligibility or in the base benefit amount will not be excluded.

**Question 2.** Is the \$50 tolerance level for errors in Section 101(b)(5) effective for the April review month, or effective April 1 for the March review month?

**Answer** It is effective for the April sample. The hold harmless applies to the implementation of the new benefit amount increase which is required to be implemented April 1. Therefore, the \$50 tolerance level applies to the April sample month case, not the cases the state pulls in April for a prior month.

**Question 3.** Is the additional benefit that will be received under the new benefit amounts included in the error calculation when the increased \$50 threshold for QC errors is applied?

**Answer** The error determination process for QC is based on using the new benefit amounts. The new benefit allotment amount authorized by the ARRA will be used in Comparisons 1 & 2; the \$50 tolerance for small errors will be applied in Comparisons 1& 2.

**Question 4.** Section 2201 of the ARRA establishes a one-time SSI/SSDI payment that is excluded from counting as income and is excluded as a resource for nine months in the SNAP. Section 2002 authorizes a \$25/week increase in unemployment insurance (UI) benefits, at the option of a State agency. The additional \$25 counts as income for SNAP and is exempt for Medicaid and SCHIP. Is there a 120-day hold harmless for the one-time SSI/SSDI payment and the UI \$25/week increase?

**Answer:** Yes, a hold harmless that applies to these provisions.

The 120-day hold harmless period will begin the date that the checks are issued for the one-time SSI/SSDI payment. The Social Security Administration anticipates issuing most of the one-time \$250 check by late May 2009.

Section 2002(a) provides that each State shall enter into an agreement with the Department of Labor. Section 2002(e) provides that the agreement applies to weeks of unemployment beginning after the date on which the agreement is entered into. Therefore, the hold harmless will begin for each State beginning with the date the State agency signs the agreement.