



United States  
Department of  
Agriculture

DEC 30 2009

Food and  
Nutrition  
Service

3101 Park  
Center Drive

Alexandria, VA  
22302-1500

SUBJECT: Supplemental Nutrition Assistance Program – Handling Multiple Applications Submitted by the Same Household

TO: Regional Directors  
Supplemental Nutrition Assistance Program

As more State agencies are able to offer households the option of applying for Supplemental Nutrition Assistance Program (SNAP) benefits online, the occurrence of households filing multiple electronic applications has become a more visible issue. FNS has been asked: must a State agency process each application submitted by a household in the application month, or may the State agency automatically deny the additional applications that follow the initial application submission?

The following clarification applies to multiple applications filed in any form during the initial month of application, whether paper or electronic.

Timing is Key to State Agency Action on Multiple Applications

State agency action on additional applications depends on whether the applications are received before or after the date of the notice of eligibility.

• Prior to Certification

If the additional applications are received prior to the date that eligibility is determined, the State agency must not automatically deny the applications, but must review the information for impact on eligibility and benefit level. The State agency should ensure that the applicant's casefile includes documentation of the additional applications received and note the source(s) used to determine eligibility and/or benefit levels. After the review has been completed, the State agency may append the additional applications to the initial application or deny them. We encourage the State agency to append, rather than deny, the additional applications in order to avoid a potentially confusing situation in which the client receives a denial notice and a notice of eligibility within a short span of time. However, if the State agency chooses to deny the additional applications, the denial notice should clearly explain the procedural nature of the denial of the additional applications and that the household's eligibility will be based on the initial application and any additional information submitted by the applicant household.


• After Eligibility is Determined

If the household is determined to be eligible, any additional applications submitted after the date of the notice of eligibility must be denied under the provisions of 7 CFR 272.4(e) (State monitoring of duplicate participation), since the household is already participating in the program. Prior to denying additional applications, however, the State agency should review them to determine if household circumstances have changed. If the household was determined to be ineligible, the State agency must act on any new application that the household submits after the date of the denial notice, provided that it contains a name, address, and signature.

Discussion

The intent of both the Food and Nutrition Act of 2008 (the Act) and the regulations is to encourage State agencies to consider all information submitted by applicants prior to certification. State agencies must accept applications that contain only the name, address, and signature of the applicant (see section 11(e)(2)(B)(iv) of the Act and section 273.2(b)(1)(v) of the regulations). In the absence of statutory language clarifying the handling of multiple applications, it must be assumed, at least initially, that additional applications submitted by the applicant prior to certification may contain additional information about household circumstances. Information collected by FNS on a recent survey on State agency modernization showed that most responding State agencies (17 out of 19) indicated that applications received after the initial applications are not automatically denied but are reviewed for supplemental information.

Please convey this information to the State agencies in your regions. If there are any questions about this policy clarification, please contact Angela Kline, Branch Chief, Certification Policy Branch, at (703) 305-2495.

A handwritten signature in black ink, appearing to read "Arthur T. Foley", written in a cursive style.

Arthur T. Foley  
Director  
Program Development Division