



APR 13 2009

United States  
Department of  
Agriculture

Food and  
Nutrition  
Service

3101 Park  
Center Drive

Alexandria, VA  
22302-1500

SUBJECT: SNAP - Interim Reporting Requirements for Participants Subject to Simplified Reporting - Clarification

TO: Regional Directors  
Supplemental Nutrition Assistance Program (SNAP)  
All Regions

This memorandum clarifies guidance issued in Food and Nutrition Service (FNS) December 8, 2008 memorandum entitled *SNAP - Interim Reporting Requirements for Participants Subject to Simplified Reporting*. Some State agencies have inquired as to whether they must apply all of the individual Simplified Reporting (SR) requirements at 7 CFR 273.12 (a)(1), outlined in the memorandum, to categorically eligible households or to households that have had the value of their vehicle excluded because the State's SNAP vehicle rules are aligned with those of the Temporary Assistance to Needy Families program (TANF). State agencies do not want to require households to report information on excluded vehicles or other excluded resources that is not germane to a determination of continuing eligibility.

SNAP regulations at 7 CFR 273.2(j)(2)(v) allow State agencies to determine eligibility for categorical eligibility households without regard to their resources and the resource eligibility regulations at 273.8(f)(4) allow State agencies to align their vehicle rules with those of TANF and apply those rules to all households Statewide. However, the reporting regulations at 7 CFR 273.12 (a)(1)(iv) and (v) require SR households to report on the interim report the acquisition of any licensed vehicle that is not fully excludable and cash on hand, stocks, bonds, and money in a bank account or savings institution that reach or exceed a total of \$2,000. These regulations do not provide States with the authority to suspend specific reporting requirements to align with their categorical eligibility requirements. Therefore, aligning SR interim reporting requirements with categorical eligibility policies would require an FNS approved waiver of the reporting regulations.

FNS supports State efforts to align categorical eligibility, vehicle valuation, and reporting requirements to improve customer access and achieve administrative efficiencies and recognizes that many State agencies are strained administratively at this time. As a result, FNS is allowing this memorandum to serve as a blanket waiver of the SR resource reporting requirements at 273.12 (a)(1)(iv) and (v) for States that certify households under Statewide categorical eligibility or exclude the value of vehicles Statewide as a result of aligning their vehicle valuation policy with TANF. States operating under SR and certifying households under categorical eligibility or excluding vehicles in alignment with their TANF policy may amend their SR reporting forms for the affected population to remove references to resources or excluded vehicles without an individual waiver from FNS. This policy is effective from the date of this memo until further notice.

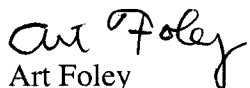
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States that opt to adopt this waiver and amend their reporting requirements accordingly to align with their categorical eligibility requirements must notify their Regional Office of any change in their reporting requirements.

FNS understands that this waiver may not address all situations where a State has received a waiver for certain eligibility requirements, but does not have an attendant waiver of the reporting requirements. States needing to amend their reporting requirements to align with eligibility requirement changes not related to categorical eligibility or vehicle exclusions for households certified under SR should request an individual waiver of the specific reporting requirements from FNS.

If you have any questions, please contact Melissa Daigle Katz at [Melissa.DaigleKatz@fns.usda.gov](mailto:Melissa.DaigleKatz@fns.usda.gov) or via email at 415-705-1320, ext. 304.

Sincerely,



Art Foley  
Director  
Program Development Division