



## SNAP 201-10

### NAC-NATIONAL ACCURACY CLEARINGHOUSE

### Dual Participation: Interstate Data System

**Supersedes:** FS 201-10

**Reference:** 7 CFR 272.18; 7 CFR 272.4(b); CFR 272.18; CFR 273.12; Agriculture Improvement Act of 2018; NAC IFR Policy Memo

#### **Overview:**

The NAC interim final rule promulgates the requirements of the Agriculture Improvement Act of 2018 (2018 Farm Bill) to establish the NAC for the purpose of preventing multiple issuances of SNAP benefits to an individual by more than one State agency simultaneously. State agencies are required to share information about SNAP participants with the Food and Nutrition Services (FNS), conduct matches against the NAC to discover and prevent interstate duplicate participation, and take appropriate actions when matches are found.

The NAC is an interface that will be part of CHIMES Universal Inquiry screen and have a NAC Website. This inquiry will show if households have or have had SNAP in the following states: Iowa, Louisiana, Massachusetts, and The Department (other states will be added a later date). All other states must comply by October 4, 2027.

The NAC website is located at: <https://search.nac.fns.usda.gov/>

#### **Reporting Requirements:**

1. The Department must provide information for each active SNAP participant to the NAC according to procedures and formats established by FNS. For the purposes of the NAC, an active SNAP participant is defined as an individual who is approved to receive benefits for the benefit month in which the State agency is uploading the data. The Department shall establish procedures to ensure the information provided is accurate and only includes active participants.
2. For each individual, The Department must report the following identifying information, referred to as NAC data matching elements, to the NAC: name, Social Security number, and date of birth. The Department must transmit the NAC data matching elements to the system per the process specified by FNS. The NAC data matching elements are used by the NAC to determine the existence of positive matches.

3. The Department shall also report the following information: participant ID and, when applicable, a vulnerable individual flag. All information shall be reported in accordance with procedures provided by FNS. Eligibility Workers must comply with SNAP 301-1 in instances where a Social Security number is not available.
  - a) A vulnerable individual flag is used to identify when precautions must be taken to protect the individual's information in the event of a match. A vulnerable individual can self-identify during the application or recertification process or may be identified by the Department on a discretionary basis using the criteria in section 3(b) of this policy.
  - b) A vulnerable individual, for the purpose of the NAC, includes but is not limited to, those who would be endangered by the dissemination of their information, regardless of their age or gender, such as a resident of a shelter for battered women and children, a resident of a domestic violence shelter, or a person who self-identifies as fleeing domestic violence at any point during application, recertification, certification, or addition of a new household member. **Vulnerable individuals should be marked as “living in a domestic violence shelter” in CHIMES. Please see the NAC Interface Business Process**
4. The Department shall maintain the security, privacy, and accuracy of information submitted to the NAC, including ensuring that information provided to the NAC follows the standards and procedures provided by FNS and only includes **active SNAP participants**.

#### **Use of Match Data:**

1. Prior to conducting a NAC query at application, recertification, or the addition of a household member, the Department shall follow verification procedures described in SNAP 303-1 for Social Security numbers and SNAP 103-5 for residency and identity. After following these verification procedures, The Department shall conduct a NAC query on the individual applying, recertifying, or being added to a household.
2. When the Department receives a positive match from a NAC query at application, recertification, or when adding a household member:
  - a) The OPA shall have 10 days from the date the match is received to initiate action to resolve the match and notify the other State agency of the initiated action.
  - b) The Department must resolve the match to determine the appropriate actions to take on the case. To resolve a match, the Department may use information known to the Department, must verify any questionable information in accordance with SNAP 1501-1, and must notify the individual of the match. The Department may not take any action to deny, terminate, suspend, or reduce SNAP benefits based on information received from the NAC until the information has been verified by the Department and the individual has been provided notice of the match and an opportunity to respond to the notice, in accordance with SNAP 103-5.

3. Any communication or notice resulting from a NAC match must not include the location of the individual(s).
4. If the OPA needs more information to resolve the match or if the information it has could lead to a denial of benefits or other adverse action on the case, the Department shall provide a written notice of match results that clearly explains what information is needed from the household and the consequences of failing to respond within the timeline provided in the notice. The notice must comply with bilingual requirements and must afford at least 10 days from the date the notice is mailed for a response.
5. After The Department has determined the appropriate disposition of the case, it shall promptly share the resolution information with the other state agency.
6. Timeline standards must be followed for normal and expedited processing as applicable. A lack of timely action or communication between state agencies must not delay the determination of benefits for an individual or household.
7. The NAC shall automatically conduct bulk matches on a monthly basis of the NAC data matching elements provided by all participating state agencies from the daily upload of active SNAP participants to discover existing duplicate participation and shall provide notifications to State agencies when matches are found for participants in their state.
8. If the Department receive information related to a NAC data match during the certification period for an individual currently participating in SNAP in the state of Montana, it must initiate action to resolve the match and communicate with the other state agency within 10 days of the match notification. Information related to a NAC data match that may be received during the certification period includes:
  - a) Notification of data matches directly from the NAC indicating that an active SNAP participant is receiving benefits in another State; and
  - b) Communication from another State agency based on an NAC data match indicating that an active SNAP participant is part of an applicant household or was added to an active household in another State.
9. When the OPA receives a NAC match from another state, the household must be sent a *notice of match results* combined with a *notice of adverse action*.
  - a) The notice of adverse action must provide an opportunity to contest the information received and must allow the household no fewer than ten (10) days to provide required verification.
  - b) Any communication with the household, including a written notice, must not include the location of the individual(s) identified in a match and must follow bilingual requirements.

10. After the OPA has determined the appropriate disposition of the case, they shall share the resolution with the other State agency.
11. Eligibility workers must report and document in case notes all instances of matches and the actions taken to resolve them.
12. Montana shall provide for the establishment and collection of claims as appropriate.
13. Information obtained from the NAC is subject to the disclosure provisions in SNAP 101-1 and SNAP 103-3. The Department shall not use information obtained from the NAC for any purpose other than to prevent duplicate participation.

**Effective Date:** October 25, 2023