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Maribelle Balbes
United States Department of Agriculture
Food and Nutrition Service
1320 Braddock Place, 5th Floor, Alexandria, VA 22314

RE: Supplemental Nutrition Assistance Program: Requirement for Interstate Data Matching To Prevent Duplicate Issuances, 87 FR 59633

Dear Ms. Balbes,

As the bipartisan national membership association for state and local human services agencies, APHSA is writing on behalf of our members in response to the interim final rule for the implementation of the National Accuracy Clearinghouse (NAC). Our members have been looking forward to this new technology that will assist them in preventing duplicate issuance across state lines and are excited to see the interim final rule posted. We appreciate FNS providing regular updates on the progress of the NAC at our regular meetings with states, and their regular assurance about the technical assistance that will be available along the way. Our comments focus on the additional details that our members require for a successful implementation of the NAC for both the state agency and the SNAP households. Providing additional clarification and guidance around timelines, available technical assistance and funding, and ways to ensure continued timely delivery of benefits to mitigate increased administrative burden for the state and the customer throughout implementation and creation of the final rule will be essential to administering a NAC that is both customer-centered and strengthens program integrity.

- 1. Timeline for onboarding to the NAC:** While the first states set to implement the NAC are aware and excited for the process, the rest of states have not yet been assigned their phase for implementation. The interim final rule says that states will be assigned to phases based on their readiness, but it does not give a timeline for when states will be notified. According to feedback from our members, many states need at least two years notice for this level of systems update to be processed in a timely manner. To provide additional clarity for states, FNS should provide a specific timeline for each phased-in group with guidance on requirements for states in each phase. This could then be used to solicit feedback from states about which phase they would like to join and give them ample time to prepare.
- 2. Technical assistance and funding support:** The interim final rule assures that states will be provided technical assistance to train eligibility workers on the process for using NAC, including when to conduct matches, how to respond to matches, how to verify information, and how to provide necessary notices, all while ensuring a timely process. States have several questions that require clarity around the technical assistance that will be available including what forms it will be available in (such as webinars with national office, regular calls with peers and/or regional officers, site visits, etc.), who it will be offered by, and what time periods and processes it will be available for (such as the planning phase, process of the systems change, introducing it to customers, and more). The interim final rule also estimates that states will spend \$16 million over five years for the onboarding process. This cost will likely vary in the burden

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it places on states across the country based on their systems readiness. FNS should outline where technical assistance and other opportunities can help offset potential costs with the onboarding process. As soon as possible after the implementation date, FNS should provide clarity on exactly what technical assistance states should expect at no cost, and how they can leverage it.

3. **Continued timely delivery of benefits:** As outlined in the interim final rule, states will be required to upload the entirety of their caseloads to the NAC each day. This has raised questions from states about the capacity of their systems to update this information along with regular processes, the additional burden placed on staff to ensure proper upload each day, and the general delays in timely approval and delivery of benefits for customers. As FNS begins implementation, they should pay close attention to how systems are affected, increases to staff burden, and general timeliness impacts for benefit delivery to understand if changes to the upload process and timeline should be adjusted in the final rule.
4. **Focus on Customer Experience:** While FNS shares what constitutes a match in NAC and the need to remove people from dually participating, the interim final rule lacks clear information on how states should communicate and support customers through this process. For example, states are unclear as to what should be done while the state is waiting for a match, and whether this would hold up the completion of a case and cause undue burden on the household. When there is a match, there is also a lack of clarity as to the level of burden that is required for verifying the information, and when it would be appropriate to remove someone from a household. To support states in working through these questions and the on-the-ground implementation realities of the NAC, FNS should share specific best practices in the field on established standard work, processes, and policies to best support agency staff and provide quality customer service.

We appreciate FNS's efforts thus far to put the NAC into action, and look forward to additional, focused guidance that support states in their required efforts to implement and continue to monitor the NAC. Since many states have yet to begin the onboarding process for NAC, and those that have tend to be the most well-equipped states to implement these new processes, APHSA recommends that FNS delay its final rule for the NAC until the majority of states have completed the onboarding process. This will allow FNS and states time to understand any substantial changes that are needed for the success of the program in the long term.

To have further conversation on the comments presented and ways to engage with state agencies, please reach out to Chloe Green, Senior Policy Associate for Food and Nutrition Services at cgreen@aphsa.org.

Sincerely,

Chloe Green

Sr. Policy Associate, Food and Nutrition Services
American Public Human Services Association

Cathy Buhrig

Chair
American Association of SNAP Directors