

SNAP E&T Intermediary Role Assignment Framework: Decision Guide for State Agencies

This Guide's Purpose

This Decision Guide is intended to help state agencies determine the role that an intermediary can play in administering a SNAP E&T program. State agencies are responsible for numerous tasks to ensure their SNAP E&T programs run smoothly—not only within their agency but also for providers and, most importantly, for participants. State agencies can enter into agreements with intermediaries to support SNAP E&T program administration, increasing the program's capacity and reach. No uniform scope for intermediaries' roles and responsibilities exists—it varies greatly from state to state. As such, state agencies have the flexibility to determine what tasks an intermediary will be assigned.

How to Use This Guide

This Decision Guide includes a series of questions about SNAP E&T program responsibilities that state agencies might assign to an intermediary. Below each question is a decision on whether the state agency will continue to maintain responsibility over the task or whether the intermediary will be given the responsibility with state oversight. After each decision, there are suggestions on what can be added to an intermediary handbook as well as other policy and procedure considerations.

This tool can help a state agency determine the general structure of the relationship with an intermediary and clarify shared responsibilities. Once completed, the results can inform the drafting of an intermediary handbook. See [Developing a SNAP E&T Intermediary Handbook: A State Agency Guide](#) for more.

For states with more than one type of intermediary or a hierarchy of intermediaries (i.e., an intermediary that forms an agreement with another intermediary), this tool can help determine roles and responsibilities. Each situation will be different, just as all SNAP E&T programs are different. If a state agency is pursuing multiple intermediaries with different roles, this tool can be used for each individual intermediary agreement.

Think About



The tool asks state agencies to define administrative responsibilities with intermediaries using a simple binary—either the intermediary performs a task or it does not. Some selections may ultimately translate into shared or blended responsibilities. When working through the tool, agencies should keep in mind that the tool is intended to support the design of a structure and working relationship that best fits an agency's SNAP E&T program, rather than to prescribe a single “right” approach.

SNAP E&T Program Responsibility Decisions Included

This Decision Guide includes ten responsibilities a state agency might assign to an intermediary, listed in the left-most column in Table 1 below. For a more detailed guide, examples, best practices, and additional considerations about any of these decisions, please refer to [Developing a SNAP E&T Intermediary Handbook: A State Agency Guide](#). It outlines, step-by-step, the process for drafting a state agency's intermediary handbook. Sections within the [Intermediary Handbook Guide](#) that correspond with a key decision are listed in the right-most column.

SNAP E&T Program Responsibility	Key State Decision (Y/N)	Page Number Within This Tool	Corresponding Section in the Intermediary Handbook Guide
Outreach and recruitment of Third-Party Providers (TPPs)	Will the intermediary provide outreach and recruitment of TPPs?	3	Section 5.A
Entering into Agreements with TPPs	Will intermediary enter into agreements with TPPs?	4	Section 5.B
Technical assistance for TPPs	Will the intermediary lead Technical Assistance for TPPs?	5	Section 5.C
Collaboration on policy development and implementation	Will the intermediary collaborate with the state agency about SNAP E&T policy development and implementation?	6	Section 5.D
SNAP E&T eligibility verification for billing purposes	Will the intermediary support processes to verify SNAP E&T participant eligibility for billing purposes?	7	Section 5.E
Communication about direct and reverse referrals	Will the intermediary help to communicate regarding direct and reverse referrals?	8	Section 5.F
Participation and outcome reporting	Will the intermediary collect and submit participation and outcome data from its TPP vendors?	9	Section 5.G
Invoicing and reimbursement as a consolidated fiscal agent	Will the intermediary support invoicing and reimbursement, operating as the consolidated fiscal agent for its TPPs?	10	Section 5.H
Supporting program and fiscal monitoring	Will the intermediary support the state agency with program and fiscal monitoring tasks?	11	Section 5.I
State plan process support	Will the intermediary support the development of the annual state plan?	12	Section 5.J
Program data management and sharing	N/A – Data sharing needs to be clearly defined between the intermediary, the state, and counties, if needed.	N/A	Section 5.K

Will the intermediary provide outreach and recruit Third-Party Providers (TPPs)?

Yes, the intermediary will provide outreach and recruit its own providers.



What to include in the handbook:

- Expectations for meeting the state agency's priorities for program expansion
- Identify and Recruit New TPPs
 - Specify whether the intermediary will recruit from its own membership or more broadly, and how much input the state agency will have on the process
- Provide TA on SNAP E&T and the TPP agreement process
 - Define the level of TA the intermediary will provide to interested TPPs, if at all, and document those expectations in the intermediary agreement process.



No, the intermediary will not provide outreach and recruit its own providers.

This means that the state agency will provide information on partnerships and recruit any potential TPPs. It is important to clarify that the state agency will maintain control of which service providers are targeted and the outreach messaging.

What to include in the handbook:

- Overview of how the state agency will promote SNAP E&T partnership opportunities and recruit potential TPPs or remove Section 5.A.

Will the intermediary form agreements with Third-Party Providers (TPPs) and manage relationships with those vendors?



Yes, the intermediary will negotiate with and enter into agreements with TPPs as its own vendors.



No, the intermediary will not enter into agreements with TPPs.

What to include in the handbook:

- State Agency Expectations and Guidelines
- Timeline
 - Provide clarity as to when the intermediary may issue new and renewed agreements. Keep the state plan timeline in mind and whether TPPs may be added mid-year.
- Requirements
 - Requirements of the intermediary's agreement with vendors, including issuance, any standard language inclusion, monitoring expectations, and other program information to ensure compliance.
- Expectations
 - The state agency can define expectations regarding who the intermediary forms agreements with. Also, indicate responsibilities for the compliance, reporting, and outcomes of intermediary's vendors.

What to include in the handbook:

- Instructions for the intermediary to guide potential TPPs to the state agency's agreement development process or remove Section 5.B.

Will the intermediary lead Technical Assistance for TPPs?

Yes, the intermediary will lead technical assistance to TPPs on state agency policies and procedures.

What to include in the handbook:

- Expectations for TA and policy guidance, including benchmarks and schedules, tied to monitoring and program outcomes.
- Initial and Ongoing Technical Assistance
 - Direction on new TPP onboarding, training for new TPP staff, and ongoing TA, including day-to-day operations questions, scheduled in-person TA, and LMS content development.

No, the intermediary will not be the provider of direct technical assistance.

The state agency will provide onboarding, answer day-to-day operations questions, and lead any scheduled or annual training.

What to include in the handbook:

- State agency contact information for policy questions and access to policy and provider handbooks.

Will the intermediary collaborate with the state agency about SNAP E&T policy development and implementation?



Yes, the intermediary will collaborate with the state agency about SNAP E&T policy development and implementation.



No, the intermediary will not have responsibility related to SNAP E&T policy development and implementation, including policy and provider handbooks.

What to include in the handbook:

- Expectations for leadership of the intermediary and/or collaboration with the state agency on policy development.
- Policy Development
 - Indicate the intermediary's clear roles and responsibilities regarding their support with collaboration on the state agency's policy handbook, provider handbook, and other policy-related guidance to TPPs. Final approval lies with the state agency.
- Timelines
 - Indicate timelines for policy and provider handbook drafts and when/how updates are communicated to TPPs.

What to include in the handbook:

- Information on state agency contact information for policy questions and access to policy and provider handbooks.

Will the intermediary support processes to verify SNAP E&T participant eligibility for billing purposes?



Yes, the intermediary will support processes to verify SNAP E&T participant eligibility for billing purposes.

No, the intermediary will not support processes to verify SNAP E&T participant eligibility for billing purposes.

What to include in the handbook:

- Expectations for the intermediary and details on the process of confirming initial and ongoing SNAP E&T eligibility.
- Process and timelines
 - Include technical aspects of each process, including data systems, required forms, communication with TPPs and state agency, and timelines.

What to include in the handbook:

- Refer to the TPP handbook for SNAP E&T screening, referral, and eligibility verification policies, processes and procedures, or remove Section 5.E.

Will the intermediary help to communicate regarding direct and reverse referrals?



Yes, the intermediary help will help to communicate regarding direct and reverse referrals.



No, the intermediary will not help communicate about direct or reverse referrals.

What to include in the handbook:

- Expectations for how the intermediary will communicate about direct and reverse referrals, and whether they will support one or both processes.
- Referral Process (Section 5.F.1)
 - Explanation of how the intermediary will communicate about direct referrals, the flow of communication from state SNAP E&T eligibility staff through intermediary to TPP, including expectations and timelines for TPP engagement with referred participants.
 - If intermediary does not support the communication regarding direct referrals, remove Section 5.F.1.
- Reverse Referral Process (Section 5.F.2)
 - Explanation of how the intermediary will communicate about reverse referrals, the flow of communication from the TPP, including responsibilities of the intermediary and state agency, and timelines for response and enrollment.
 - If intermediary does not support the communication regarding reverse referrals, remove Section 5.F.2.

What to include in the handbook:

- Refer to the TPP handbook for referral processes or remove Section 5.F.

Will the intermediary collect and submit participation and outcome data from its TPP vendors?



Yes, the intermediary will assist the state in collecting participation and outcome reporting on a monthly/quarterly/yearly basis.



No, the intermediary will not be involved in supporting participant referral processes for SNAP E&T.

What to include in the handbook:

- Clear instructions on what information is needed from the intermediary, in what format, and when it is expected to the state agency.
- Third-party partners
 - Expectations for the intermediary to collect accurate data from TPPs, including verification and corrections procedures.
- Timeline
 - Provide the intermediary with deadlines for monthly, quarterly, and annual reporting, including state and fiscal year-end.
- Reports
 - Detail the reporting format, predetermined forms, and/or procedures for compiling accurate data for the state agency, including data management system use.

What to include in the handbook:

- Information relevant to the intermediary's reporting needs, if any, or remove Section 5.G.

Will the intermediary support invoicing and reimbursement, operating as the consolidated fiscal agent for its TPPs?



Yes, the intermediary will be the consolidated fiscal agent for its TPPs serving as vendors.



No, the intermediary will not be the fiscal agent for TPPs.

What to include in the handbook:

- Clear policy guidelines on allowable reimbursable funds, expectations for invoice verification and submission, and expectations for reimbursement of the intermediary's vendors.
- Allowable Funds
 - Clear policy and rules on allowable, non-federal funding sources eligible for reimbursement.
- Invoicing Process and Timeline
 - Explanation of ongoing deadlines for submission, state and/or federal fiscal year-end deadlines and procedures, invoice submission procedures, and process for corrections and appeals.
- Documentation Requirements
 - Expectation for invoicing format, including documentation and expense verification.
- Reimbursement Process and Timeline
 - Explanation of timeline for reimbursement from the state agency to the intermediary and from the intermediary to TPPs, and tracking and auditing expectations.

TPPs will submit invoices to the state agency, and the state agency will issue reimbursement directly to the TPPs.

What to include in the handbook:

- Include only information relevant to the intermediary invoicing for its own services. Refer to the TPP handbook for billing and reimbursement processes or remove Section 5.H.

Will the intermediary support the state agency with program and fiscal monitoring tasks?



Yes, the intermediary will support the state agency with program and fiscal monitoring of TPPs (of the intermediary's vendors and possibly other TPPs) for SNAP E&T compliance.



No, the intermediary will not support the state agency with program and fiscal monitoring of TPPs for SNAP E&T compliance.

What to include in the handbook:

- Clear expectations of the scope, procedures, and schedule for compliance and performance monitoring that fit state agency needs.
- Monitoring Scope
 - Define expectations regarding the scope and level of the intermediary's monitoring of TPPs, including financial oversight, compliance reviews, program monitoring, agreement compliance, and expected sample sizes.
- Monitoring Procedures
 - Expectations of how the intermediary is to conduct, document, and report monitoring activities, including monitoring forms, reporting monitoring results, and corrective action procedures.
- Monitoring Timeline
 - Requirements for frequency of TPP monitoring, timeline for reporting monitoring results, and corrective action communication and completion.

State agency will monitor the TPPs and the intermediary.

What to include in the handbook:

- Include only information relevant to monitoring the intermediary's agreement with the state agency. Refer to the TPP handbook for TPP monitoring procedures or remove Section 5.I.

Think About



Regardless of whether the intermediary will be responsible for monitoring TPPs, as with all SNAP E&T partners, the state agency will need to monitor the intermediary for relevant program, data, fiscal, and other compliance.

Will the intermediary support the development of the annual state plan?



Yes, the intermediary will support the development and drafting of the annual SNAP E&T state plan, providing support in drafting relevant sections.



No, the intermediary will not support the development and drafting of the annual SNAP E&T state plan.

What to include in the handbook:

- Describe the level of responsibility expected of the intermediary, including drafting specific sections and deadlines for submission.
 - Agreements: Describe how the intermediary will support the annual agreement development process and how it aligns with the state plan.
 - Budget and Narrative: Describe how the intermediary will support and compile annual budget projections for TPPs.
 - Timeline: Provide the intermediary with a deadline for submission of state plan budgets and descriptions.
 - State Plan: Describe other information that would be helpful to the state agency's completion of the state plan. List specific sections of the state plan and clear expectations for drafts.

The state agency will communicate directly with TPPs to compile the state plan.

What to include in the handbook:

- Describe what is expected of the intermediary, including a budget projection, changes to agreements with vendors, or other relevant aspects to support the state agency's completion of the state plan.