



**FEB 01 2019**

Food and  
Nutrition  
Service

Park Office  
Center

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**SUBJECT:** Interval between Issuances due to Early Issuance of February  
SNAP Benefits during Lapse in Appropriations

**TO:** Supplemental Nutrition Assistance Program Directors  
All Regions For Distribution to all State Agencies

On January 8, 2019, the Food and Nutrition Service (FNS) notified State agencies that funding for February benefits was available through early issuance. At that time, FNS directed States to hold their February issuance files so that an early issuance strategy could be implemented. We requested States to provide early issuance of February benefits on or before January 20<sup>th</sup>, to ensure that SNAP households received benefits during the lapse in appropriations.

FNS provided a blanket waiver to State agencies on January 10<sup>th</sup> to allow for the early issuance of February Supplemental Nutrition Assistance Program (SNAP) benefits. All 53 SNAP State agencies successfully utilized the flexibility provided under this waiver to issue February benefits, maintaining access to this critical nutrition assistance during the lapse in appropriations. We want to take this opportunity to formally thank our State partners for your efforts in the successful implementation of the early issuance.

While the early issuance ensured households received their February benefits, FNS recognizes the challenge inherent in changing issuance schedules, particularly for low-income households that must work hard to make their food dollars stretch for a longer than normal period until March benefits are received. Though States changed their normal issuance procedures to meet the early issuance timeframes, this was a one-time event not designed to create a new staggered issuance procedure. Given the unique circumstances of this situation, the staggered issuance provisions of Section 7(g)(2) of the Food and Nutrition Act of 2008, as amended, requiring that no household experience more than 40 days between issuances, do not apply in this instance.

While the statutory limit does not apply in this case, FNS recognizes that 40 days is a reasonable benchmark for the length of time a SNAP household should be expected to go between issuances. FNS believes it is in the best interest of SNAP households to minimize the length of time between issuances to the maximum extent practicable and strongly encourages States to use this benchmark in considering their March issuance dates. With this in mind, State agencies are expected to develop plans to mitigate the impact and shorten the interval between February and March issuances.

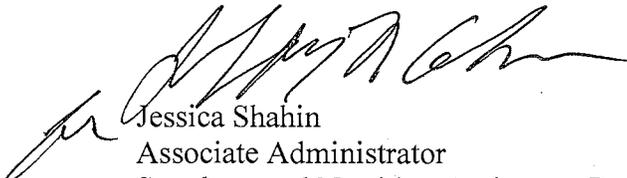
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In developing their mitigation plans, States should consider their system capacity, EBT processor flexibility, and other administrative or policy constraints in order to determine the procedures that will best serve the needs of their SNAP households while maintaining administrative efficiency. FNS recognizes that making additional changes to issuance procedures will be a challenge for many States, but we know that State agencies share our concern and commitment to timely access to benefits for eligible households and want to ease the effects of the appropriations lapse on vulnerable families.

State mitigation plans should be submitted to SNAP Regional Directors. FNS will review plans and provide guidance and technical assistance to States on an individual basis to ensure a smooth transition back to normal issuance cycles. States facing challenges making changes to their issuance procedures should reach out to the SNAP Regional Directors as soon as possible for assistance.

Please distribute this memorandum to your State agencies. States may contact their respective FNS Regional Office with any questions. Thank you for your continued partnership and adaptability as we work together to meet the needs of SNAP households.

Sincerely,



Jessica Shahin  
Associate Administrator  
Supplemental Nutrition Assistance Program