



Office of Temporary and Disability Assistance

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Informational Letter

Section 1

Transmittal:	15-INF-08
To:	Local District Commissioners
Issuing Division/Office:	Center for Employment and Economic Supports
Date:	September 2, 2015
Subject:	Supplemental Nutrition Assistance Program (SNAP) Data Collection and Reporting Requirements Related to Racial and Ethnic Data
Suggested Distribution:	Temporary Assistance Directors Supplemental Nutrition Assistance Program Directors Staff Development Coordinators
Contact Person(s):	Supplemental Nutrition Assistance Program Bureau at (518) 473-1469
Attachments:	
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Filing References

Previous ADMs/INFs	Releases Cancelled	Dept. Regs.	Soc. Serv. Law & Other Legal Ref.	Manual Ref.	Misc. Ref.
00-INF-7 05-INF-09 04-INF-11			7 CFR 272.6(g)		FNS instruction 113-1

Section 2

I. Purpose

The purpose of this release is

- to remind local social service districts (SSDs) of the federal requirements regarding the collection and maintenance of both ethnic and racial data for all applicants and recipients of Supplemental Nutrition Assistance Program (SNAP) benefits, in accordance with Food and Nutrition Service (FNS) policy, **and**
- **to advise local districts on new, proper procedures for collecting this information when it has not been provided by the applicant or recipient household when applying or adding members to the SNAP case.**

II. Background

Federal regulations require the collection of both ethnic and racial data of SNAP applicants and recipients in accordance with FNS policy. This data is used to assist in monitoring compliance with civil rights laws, determine how effectively FNS programs are reaching potentially eligible persons and beneficiaries, identify areas where additional outreach is needed, assist in the selection of locations for compliance reviews, and complete reports as required.

Social services districts must obtain both ethnic and racial data on participating households in the manner specified by FNS. The application form must clearly indicate that the provision of the information by the SNAP applicant or recipient is voluntary, that it will not affect the eligibility or the level of benefits, and that the reason for the information is to assure that program benefits are distributed without regard to race, color, or national origin.

III. Program Implications

SSDs are required to obtain and report data by both ethnic and race category on potentially eligible populations, applicants, and participants in their program service area. This information is captured on the LDSS-2921 Statewide Common Application Form and on the LDSS-4826 SNAP Application, and reported in the Welfare Management System (WMS). As indicated in publications PUB 1301, "How to Complete the Application" and LDSS-4826A "How to Complete the SNAP Benefits Application", completion of this information is voluntary.

Self-identification by the applicant/recipient is the preferred method of obtaining ethnic and racial data. Where an applicant does not initially provide this information on the application, the interviewer must ask the applicant to provide the information. The interviewer or eligibility worker may not "second guess," or in any other way change or challenge a self-declaration made by the applicant as to his or her ethnic background or race unless such declarations are patently false.

When an applicant/recipient has not provided ethnic or race information, the interviewer must encourage program applicants and recipients to provide the information by explaining the purpose for which the data is being collected.

The following statement is an example, **provided to OTDA by USDA**, of how to solicit such data from a program applicant/recipient:

"This information is requested solely for the purpose of determining the State's compliance with Federal civil rights laws, and your response will not affect consideration of your application, and may be protected by the Privacy Act. By providing this information you will assist us in assuring that this program is administered in a nondiscriminatory manner."

If the applicant declines to self-identify ethnicity and race either on the application/recertification or during the interview, even after having been advised of the purpose for which the information is being collected, the applicant should be informed that a determination of his or her ethnicity and race will be reported as "unknown", and recorded in the system.

SSDs must advise staff that whenever an applicant/recipient chooses not to fill in their ethnicity or race, the staff must explain the purpose for which the data is being collected, and encourage the applicant/recipient to provide the information. **SSDs must have a procedure in place, in accordance with the above direction, for proper collection of both ethnic and racial information.**

IV. Systems Implications

A new code of “U” unknown is now allowed for both ethnicity and race for all case types. This will allow the worker to report the ethnicity and/or race as U – unknown for program applicants and recipients who choose not to self-identify ethnicity or race.

Issued By

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