Local Commissioners Memorandum

Section 1

Transmittal: 22-LCM-05
To: Social Services District Commissioners
Issuing Division/Office: Division of Budget, Finance and Data Management
Date: March 29, 2022
Subject: Supplemental Nutrition Assistance Program (SNAP) Administrative Funding under the American Rescue Plan (ARP)
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Attachments: Attachment 1 – FFY 2022 SNAP American Rescue Plan Allocations

Section 2

I. Purpose
The purpose of this Local Commissioners Memorandum (LCM) is to issue federal fiscal year (FFY) 2022 allocations to local social services districts (districts) for additional Supplemental Nutrition Assistance Program (SNAP) administrative funding provided under the American Rescue Plan Act of 2021 (ARP). FFY 2021 allocations were previously provided in 21-LCM-16.

II. Background
The ARP provided significant new resources for SNAP recipients. In addition to continuing the emergency allotment of supplemental benefits that went into effect in April 2020, states were granted additional SNAP administrative funding to assist in carrying out legislative provisions and administering SNAP due to the economic downturn brought on by the COVID-19 pandemic. The FFY 2022 funds total $28.8 million, and $15.9 million is being allocated to districts at this time to cover the increased costs associated with processing the growing number of SNAP applications and certifications, consistent with FFY 2021 funding and allocations. A breakdown of individual district allocations for FFY 2022 is attached. Additional funding may be allocated to districts at a later date.

III. Program Implications
The Office of Temporary and Disability Assistance (OTDA) has established district allocations for the FFY 2022 ARP SNAP funds. The federal methodology for awarding funding to states was based on a two-part formula, with 75 percent of the funds allocated to states based on each state’s share of SNAP households and 25 percent based on each state’s share of the increase in the number of households participating in SNAP. OTDA is allocating these funds to districts using the same factors and each district is receiving their proportional share of funds based on statewide SNAP households and the increase in the number of statewide households participating in SNAP,
with a minimum allocation of $25,000 made available to every district. As such FFY 2022 allocations will remain at the same level as FFY 2021.

IV. Claiming Instructions
The ARP SNAP grant is 100 percent federal funds and is available to fully reimburse SNAP administrative certification costs without any required local non-federal share. The federal 50 percent SNAP administrative funds remain available to reimburse 50 percent of eligible expenditures, with the remainder supported with local non-federal funds, for certifications costs in excess of these allocations. It will not be necessary for the districts to submit a separate claim in order to access the funds provided through this allocation. Since this ARP award is available for FFY 2022 expenditures beginning October 1, 2021, OTDA will reimburse 100 percent of the gross amount of certification costs with ARP funds for expenditures reported on the original Schedule D-7 (Distribution of Food Stamp Expenditures to Activities, LDSS-2347E) claim submissions for October 2021 through September 2022 until a district’s allocation has been expended. The dollar amount to be reimbursed will be amounts taken from Section 1, Line 8, Column 2 (Certification) and Section 2, Line 6, Column 2, and added together. This will be paid at 100 percent federal share, up to the amount of the allocation, and will appear as a bottom-line adjustment on a separate claims settlement.

Since the ARP funds cannot be used as 50 percent reimbursement of eligible expenditures for regular (non-ARP) USDA SNAP funding, for those costs reimbursed with 100 percent ARP funds, there will be a bottom-line adjustment to reflect the reduction of the regular 50 percent federal share of SNAP, which was reflected as part of the USDA settlement above the line. Adjusting entries related to these transactions should be processed as a debit to A4611 and a debit to A400 for the federal share adjustment amount, and as a credit to A4611 for the ARP federal share amount. Please note that the CFDA (Catalog of Federal Domestic Assistance) number for the ARP funds is 10.561 (State Administrative Matching Grants for Food Stamp Program), the same as for regular SNAP administration. The ARP funds must be considered part of the SNAP cluster for single audit purposes, but they must be separately identified using the prefix of “ARP” on the Statement of Expenditures of Federal Awards (SEFA).

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