



Administrative Directive Memorandum

Section 1

Table with fields: Transmittal (24-ADM-10), To (Social Services District Commissioners), Issuing Division/Office (OTDA - Audit & Quality Improvement (A&QI) – Program Integrity (PI)), Date (August 30, 2024), Subject (Use of Experian for Employment and Income Verification Purposes), Suggested Distribution (Directors of Temporary Assistance (TA), Supplemental Nutrition Assistance Program (SNAP), Employment Coordinators, Home Energy Assistance Program (HEAP), Medicaid (MA), and Services, District TWN Web Managers, Child Care Supervisors, Child Care Assistance Staff, All Current and Future TWN Users.), Contact Person(s) (Rebecca Frederick, OTDA A&QI – PI Unit, 518-408-0006, Rebecca.Frederick@otda.ny.gov; Jennifer Pelletier, OTDA A&QI – PI Unit, 518-408-5853, Jennifer.Pelletier@otda.ny.gov), Attachments (Attachment 1 - Experian Terms of Use, Attachment 2 - USDA Membership Application USDA Onboarding, Attachment 3 – Security Designate Request Form)

Filing References

Table with 6 columns: Previous ADMs/INFs, Releases Cancelled, Dept. Regs., Soc. Serv. Law & Other Legal Ref., Manual Ref., Misc. Ref.

Section 2

I. Purpose

This ADM is to advise the Social Services Districts (districts) that the United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) has entered into a national-level, FNS-funded contract with Experian to provide unlimited earned income verifications for Supplemental Nutrition Assistance Program (SNAP) applicants and recipients through Experian Verify.

II. Background

On September 30th, 2023, FNS awarded a five-year contract (base year plus four option years) to Experian for the purpose of SNAP Earnings Verification Services (SNAP EVS). This is a national-level contract that is funded by FNS to enhance state's abilities to verify earned income sources and amounts for SNAP applicants and recipients. Experian will provide exclusive payroll data from more than 25,000 employers, which is not available by any other provider and is estimated to cover 12% of the workforce.

OTDA has entered into a Memorandum of Understanding (MOU) with Experian and FNS, which will allow districts to utilize this resource to enhance their verification of SNAP households' earned income sources and amounts.

III. Program Implications

This contract with Experian is for the purpose of earned income verification of SNAP cases/applications and may also aid in verifying other SNAP eligibility factors, such as employment status, employment hours, and Quality Control (QC) reviews. Please be advised that the Experian Verify service is for the verification of SNAP household members at certification, recertification, if a change is reported by the household during the certification period that requires verification, and for conducting SNAP QC reviews. Compliance with the MOU that OTDA has signed with FNS requires that, any submissions must have a SNAP component to them. If the case is solely for another program type(s) (ex: TA, HEAP, or MA) without a SNAP component it cannot be run through Experian Verify.

If the database returns a "match" for the SNAP applicant/recipient, and the match confirms the accuracy of the household-provided income information, the district can use the match information to satisfy the statutory requirement to verify earned income and additional verification is not required.

Please note that Experian is providing access to earnings records that are solely available through Experian Verify, and therefore, are unique and supplemental to earnings records that can be accessed through Equifax's The Work Number.

IV. Required Action

To participate in this unlimited employment verification contract, each district must have an authorized party sign **Att. 1 - Experian Terms of Use**. OTDA has already signed off on this document and its terms of use, but Experian requires each district to complete it as well to allow the capability to add or remove access to this tool on the district level. When completing this form, under "Name of Participating Agency (State Agency):" please list your district name after "NYS OTDA." This will allow OTDA and Experian to identify which districts are utilizing this tool.

In addition to the above document, each district must identify up to two staff members who will administer access to the Experian Verify application (Head Designate and/or Security Designate (Admins)), and act as the liaison(s) between the district and OTDA/Experian.

OTDA recommends that the Admins be the same staff members that currently manage access to Equifax-The Work Number, as they will be familiar with this type of access administration. The primary staff member who will be granting end user access to Experian Verify must complete **Att. 2 – USDA Membership Application USDA Onboarding** to receive the necessary Head Designate/Admin credentials. If there is a second staff member identified to administer end user access, then they will need to complete **Att. 3 – Security Designate Request Form**. Please note that administrative ability is limited to two staff members at each location, and while districts are not required to utilize two administrators, it is recommended for coverage purposes.

The Experian Admins at each district may only grant a district employee end user access to Experian Verify upon confirmation by district supervisor, who maintains supervisory responsibility over district employee member, of a business need to verify income for an eligibility determination for applications with a SNAP component.

Please return all completed forms to Rebecca.Frederick@otda.ny.gov and Jennifer.Pelletier@otda.ny.gov. Once reviewed, OTDA will submit these forms to Experian to begin the onboarding process for your district.

Experian Verify must not be accessed for personal reasons or to provide Data to a third party. Consent of the consumer (applicant) is required to complete a lookup, and the applicant must be over 18. The full FCRA language can be found here: [Fair Credit Reporting Act \(ftc.gov\)](https://www.ftc.gov) All documents and materials containing Experian Verify information must be kept secure and confidential as they contain Personally Identifiable Information (PII). Staff may not disseminate, use, or permit the dissemination of Experian Verify information in a manner that is not consistent with the purposes outlined in this ADM.

The signed applications LDSS 2921, 3174, and 4826 are sufficient for this authorization due to the language included in them. Experian Verify lookups may not be completed on any applicant/recipient that has not provided that authorization. The vendor performs permissible purpose audits on Experian Verify lookups throughout the life of the agreement, which requires the lookups they are auditing have signed authorization. If the vendor finds there was not an authorization or that the lookup failed to meet the permissible purpose and programs, it could result in the loss of Experian Verify usage. Additionally, a user who is responsible for an unauthorized access to Data may be subject to civil and criminal liability under the FCRA and punishable by fines and even imprisonment.

V. Systems Implications

Experian Verify is a web-based platform which works across all browser types.

VI. Effective Date

Immediately.

Issued By:

Name: Thomas Cooper

Title: Deputy Commissioner

Division/Office: Audit and Quality Improvement