

DATE: September 25, 2015

TO: Subscribers

SUGGESTED DISTRIBUTION: Commissioners, TA Directors, SNAP Directors, MA Directors
Staff Development Coordinators, Financial Directors, Adult Services Directors,
Employment Coordinators

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SUBJECT: Potential Federal Government Shutdown and SNAP (Supplemental Nutrition Assistance Program)
Benefits

EFFECTIVE DATE: September 25, 2015

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Background

Congress has not yet passed appropriations for Federal Fiscal Year (FFY) 2016, which begins on Thursday, October 1, 2015. If Congress does not pass an appropriations for all of FFY 2016 or a continuing resolution for temporary appropriations by that date, the federal government will “shutdown” effective Thursday, October 1, 2015. Funding for some, but not all, federal programs will be affected immediately. Funding for SNAP benefits **will** be affected immediately.

Congress currently has not appropriated any funding for SNAP benefits for FFY 2016. There are some reserve funds for SNAP benefits from FFY 2015 remaining. However, the reserve benefits are only enough to partially fund the recurring SNAP benefits (i.e., benefits for current recipients) for October.

Please see and read the Question and Answer document from the United States Department of Agriculture (USDA) on the impact of a federal shutdown on SNAP. Here is a link to the announcement on USDA’s website: <http://www.fns.usda.gov/snap/2015-gas>.

Program Implications

- **In the event of a federal government shutdown, local social services districts must continue to accept and fully process SNAP applications, recertifications and undercare case changes as usual.** In other words, the federal shutdown does not affect the normal processing of SNAP cases in any way whatsoever.
- Benefit files for recurring October SNAP benefits are being sent to the State’s EBT vendor and are being processed as usual. This means that benefits for October will be deposited into EBT accounts on the regular benefit availability schedule and in the correct benefit amounts. Once SNAP benefits are made available in EBT accounts starting on October 1, SNAP recipients who check their account

balance through the EBT hotline or through a card swipe balance inquiry transaction will see the deposited benefits as usual.

- Redemption of SNAP benefits, at least initially, will proceed as usual in October. However, as noted in the attached Q and A document, USDA does not expect the reserve funds to last for more than a few days. If Congress fails to pass an appropriation that includes funding for SNAP benefits within the first few days of October, then, as October SNAP benefits are redeemed and the reserve funds for SNAP are depleted, USDA will take steps to shutdown EBT SNAP processing across all SNAP merchants throughout the state.

A cessation of EBT SNAP processing will completely prevent the redemption of any SNAP benefits, including unredeemed benefits issued for previous months. (Despite the wording of the Q and A document, unredeemed SNAP benefits from prior months will be redeemable in October until a complete shutdown of SNAP EBT transactions occurs.) SNAP recipients' EBT accounts will continue to show correct balances, but retailers will be unable to authorize and process SNAP EBT transactions. This includes any attempts to authorize SNAP manual vouchers by retailers.

- **As noted in the USDA Q and A document, October Family Assistance and Safety Net Assistance cash benefits and EBT cash transactions will NOT be affected by the federal government shutdown.**
- The causes of a shutdown and its remedy are matters of federal law and federal authority and can only be resolved by the federal government. If SNAP EBT processing is shut down by USDA and SNAP recipients are unable to redeem benefits, **the loss of access to SNAP is NOT an issue that can be resolved through the administrative hearing process.** SNAP recipients should be actively discouraged from calling to request fair hearings on matters related solely to this issue.
- USDA will be informing authorized SNAP retailers, and releasing information to the public about the possible consequences of a federal government shutdown.
- Because of the short timeframes involved with the threat of such a shutdown, it is not possible to notify each SNAP household individually about the possible consequences of a shutdown. OTDA will be sharing information about the possible consequences via its website, its hotline and provision of information to social and mass media, to SNAP retailers, and to local social services districts and community partners.
- In the event of a federal government shutdown, USDA has not yet provided the states with instructions on the handling of daily SNAP EBT benefit files. OTDA will provide local districts with this information when it is available. Local social services districts should continue to accept and fully process SNAP applications, recertifications and undercare case changes as usual unless otherwise notified by OTDA.

Required Actions

- As noted above, all local social services districts are directed to continue to accept and fully process SNAP applications, recertifications and undercare changes. In other words, the federal government shutdown does not affect normal case processing activities and rules.

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- As noted above, OTDA will be sharing information about the possible consequences via its website, its hotline and provision of information to social and mass media, local social services districts and community partners. If USDA does take steps to shutdown EBT SNAP processing across all SNAP merchants throughout the state in the event of a shutdown, a message will be posted to the EBT helpline (1-888-328-6399), to the OTDA hotline (1-800-342-3009) and to the EBT cardholder account website (<https://www.ebt.acs-inc.com/>). We are asking and encouraging local social services to also disseminate information about the possible consequences of a federal shutdown.
 - Should a federal government shutdown result in the complete cessation of SNAP EBT processing, we should expect an increase in requests for emergency assistance for food. Obviously, SNAP benefits would not be available to meet such immediate needs. Local districts would have to meet emergency food needs by other means, including emergency cash assistance as directed in 02 ADM-02 http://otda.ny.gov/policy/directives/2002/ADM/02_ADM-02.pdf). Individuals in need may also be referred to regional food banks https://www.health.ny.gov/prevention/nutrition/hpnap/regional_foodbank_map.htm).