



DATE: June 9, 2025

OPERATIONS MEMORANDUM #25-06-01

SUBJECT: The National Accuracy Clearinghouse (NAC) and its Impacts on the Supplemental Nutrition Assistance Program (SNAP)

TO: Executive Directors

FROM: Robert Hixson
 Director
 Bureau of Operations

PURPOSE

To provide information on the NAC and the creation of the Duplicative Enrollment Database (DED) information exchange (DX-15).

SUMMARY AND CHANGE

New Policy
The DED will be queried after identity, residency and Social Security Numbers (SSNs) are verified at application, household addition, renewal and through a monthly bulk matching process.
DX-15 is not verified upon receipt.
Applicants with a pending DX-15 hit are not eligible for Expedited SNAP (EXFS) until the hit is resolved.
Vulnerable individuals must be designated as such when appropriate.

New Process
Each time a worker visits the DED screen they must click 'Retrieve NAC Information' to refresh the data.
All necessary DED queries have been automated and DX-15 information exchange hits may be created as a result. DX-15 hits must be verified within 10 days of receipt.
The final disposition of DX-15 hits must be entered once verification is provided and/or the case is closed.

BACKGROUND

The Agriculture Improvement Act of 2018 requires the Secretary of Agriculture to establish an interstate data system called the NAC to prevent issuance of SNAP benefits to an individual by more than one state agency simultaneously (also known as interstate duplicate participation). It also requires state agencies to take appropriate action with respect to each indication from the NAC that an individual may already be receiving SNAP benefits from another state agency. The Food and Nutrition Service also established safeguards to ensure households receive benefits for which they are eligible and are not incorrectly removed from the Program. Currently only a few states participate but by 2027 all states must report to the NAC.

DISCUSSION

The Pennsylvania (PA) Department of Human Services (DHS) is required to query the NAC through the DED at every new application, recertification and addition of a household member to a SNAP household. DHS will be required to update the DED with information about active SNAP recipients in PA and will receive information provided by the DED to validate that new applicants or recipients are not receiving SNAP benefits in another state. The DED exchange information will be in DX-15.

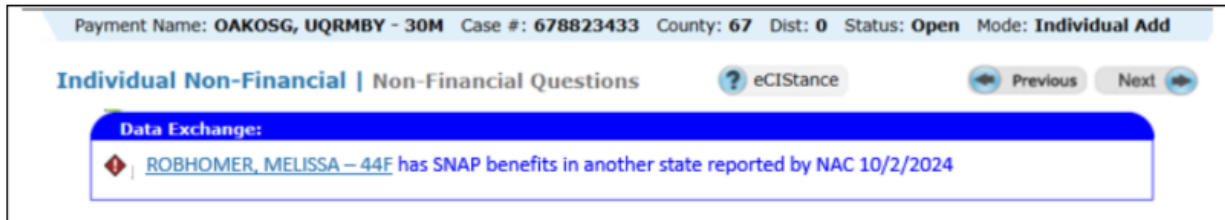
Under the 2018 Farm Bill, information provided to the NAC may only be used for the purposes of preventing duplicate participation in the SNAP program. ***It may not be used for any other purpose or program.*** DHS will also continue to use PARIS to monitor for duplicate participation as required by law. At this time, the NAC system is not meant for use with Disaster SNAP.

PROCEDURES

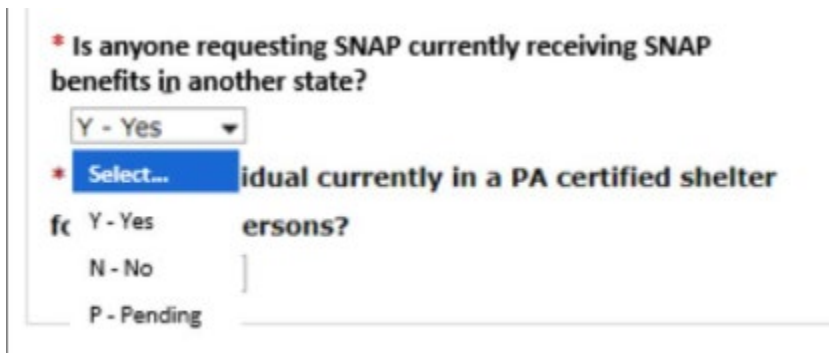
A new DX-15 exchange will be created to support exchanging information between the Electronic Client Information System (eCIS) and NAC in near-real time. A nightly batch will send all SNAP recipient information in eCIS to NAC's DED and will receive new and updated match information. DX-15 will have two screens: DED Match Summary and DED Match Details. The DED Match Summary screen will display high level information and when the detail button is clicked the caseworker will go to the DED Match Details screen. The DED Match Details screen will help the caseworker to gather information about the hit and act on the case. This is also where the caseworker would find updates about the hit from other states through the Retrieve NAC Information button.

Case Processing (CP) will make a call to DX to receive match information for the new NAC exchange for SNAP cases during application, reapplication, and the addition of a new household member. During a new application or renewal workflow, this will happen when the caseworker navigates to the next or previous screen after the Demographics screen. During the Individual Add workflow, this will happen after the worker processes past the Individual Program Request screen and confirms that the

person being added to the household is requesting SNAP. If a match is found this will prompt the new Workload Dashboard (WLD) work item for the DED exchange hit. A new blue link alert will display on the Case Summary and Individual Non-Financial Questions screens in CP when an individual on a case has a DX-15 exchange hit.



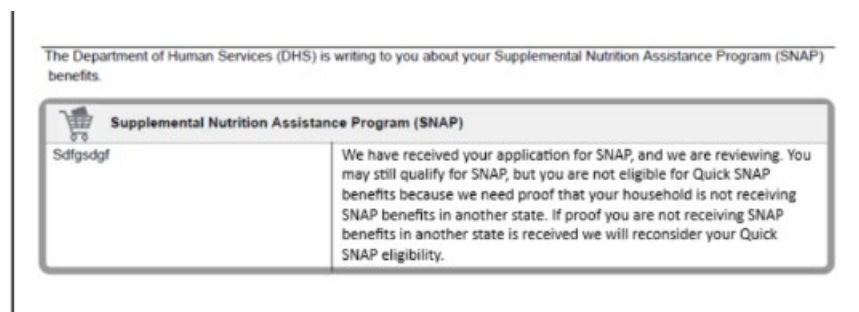
On the Program Request Questions screen caseworkers will have a new 'P-Pending' dropdown option for the 'Is anyone requesting SNAP currently receiving SNAP benefits in another state?' question.



If the "Pending" Option is selected, this will trigger a failure in eligibility and the new NAC notice for SNAP applications and open cases.

EXFS benefits

This also applies to EXFS benefits. If the household would be otherwise eligible for EXFS, but the question '*Is anyone requesting SNAP currently receiving SNAP benefits in another state?*', is pending, the household will fail and get a 744/5 notice informing them that they are not currently eligible for EXFS.



The case will have an auto narrative entered when a NAC match notice is requested and when the household is not eligible for EXFS because of a pending NAC evaluation. After the DX-15 information is evaluated by the caseworker, the EXFS will be evaluated again, and the household may be determined eligible if there is a change.

The 'Is anyone requesting SNAP currently receiving SNAP benefits in another state?' question on the Program Request Questions screen will be made available on Reapplication, Individual Add, and Maintenance workflows to trigger a failure in eligibility, trigger a new NAC notice, and commit advance closure with adverse action for SNAP cases.

NOTE: Any time a worker enters the DX-15 hit, they should click Retrieve NAC Information to update the information from the matching state in the details.

Duplicate Enrollment Database Match Details | SADXDD Assignments > Summary > Details

Basic Information

SSN	Name	Assigned Worker	Co/Record#	Individual #	Dist
344-65-4756	KSLOWGS, KSLOWGS		678405841	464073004	0

Exchange Status	Data Receipt Date	Hit Receipt Date	Source PA	Participant Closing Date	PA Recent Benefit Issuance Months	PA State	Status
Hit Pending	05/15/2025	05/15/2025	PA		N/A		Matching State

Match Information For Other State

Match ID	State	Case ID	Participant ID	Vulnerable	Participant Closing Date	Recent Benefit Issuance Months	Email Address	Phone Number
2BRYKLC	NY		PATESTPID9	No		N/A	nac: train@usda.example	(123) 555-0102

NAC Verification Disposition Management

Update PA Match Information For NAC Match ID [2BRYKLC]

Does this match include a vulnerable individual? * ⓘ

Yes No

Is this an invalid match? *

Yes No

Invalid Match Reason: Select ...

Reason for Other:

Do not enter any PII into the description. Reason for Other is required when 'Other' Invalid Match Reason has been selected

250 Characters Remaining

Initial Action Taken: Select ...

Initial Action Date: mm/dd/yyyy

Final Disposition Taken: Select ...

Final Disposition Date: mm/dd/yyyy

[UPDATE NAC INFORMATION](#) ⓘ

Information For Initiating State [NY] In NAC

Vulnerable Individual: Yes

Invalid Match:

Initial Action Taken:

Initial Action Date:

Final Disposition Taken:

This data was last updated 05/28/2025

RETRIEVE NAC INFORMATION ⓘ

NAC Information Updated

Vulnerable Individual Designation

DHS is required to protect those people who may be considered vulnerable individuals. For the purpose of the NAC, a vulnerable individual is someone whose safety would be in danger by the disclosure of their information, regardless of age or gender, such as:

- someone whose living arrangement field shows them residing at a shelter for battered spouses or children; or
- a victim of domestic violence; or
- any person who self-identifies as fleeing domestic violence at any point during application, recertification, certification, or addition of a new household member.

DHS is required to take steps to ensure that any information resulting from a NAC match, including their identity and location, is protected during verification and resolution when that person has a positive match. In DX-15, the worker will select a Yes/No indicator for vulnerable individual status.

Case Action

When a hit is created, initial action must be taken by the CAO within 10 days of the match being identified by NAC. Caseworkers will act on the case to trigger a new NAC notice and prevent SNAP benefits from being issued to the individual identified as a NAC match. The caseworker will select ‘P-Pending’ in the dropdown ‘*Is anyone requesting SNAP currently receiving benefits in another state?*’ on the Program Request Questions Screen. The caseworker will then proceed to run eligibility, and eligibility will fail with reason code 042.

NOTE: The system will not request a NAC hit if the individual does not have an SSN, date of birth and/or name entered in eCIS.

A PA 253 will be triggered for a new unverified item, “158 - Proof of Out-of-State SNAP Closure” and a VERF062 alert will be created on the WLD. On the SNAP Budget

Authorization screen, a green alert will display to notify the worker that the NAC Match Notice has been successfully requested. An automatic narrative will generate when the SNAP Budget Authorization screen is loaded due to a NAC Match if the budget fails EXFS due to NAC Match or if the NAC Match Notice is generated at case open/program add, reapplication or individual add.

A new SNAP exclusion code 38 – SNAP in another state (NM) will be added to the Individual Program Request screen dropdown to exclude an individual identified with a DED hit from the budget.

OOTH	Individual	Cash SNAP MA	Family Works	Family Planning	LTL	LH	LW	Cash Exclusion	SNAP Exclusion	LIHEAP Exclusion	LIHWAP Exclusion	SSI Begin Date	CHIP Start Preference
<input type="checkbox"/>	UBYTIL, BFLCJV - 40M	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		Select...				
<input type="checkbox"/>	UBYTIL, KHXHB - 9M	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		SNAP in another State (NM)			38	02 - Firs
									Foster Care (NM)			41	
									Boarder (NM)			42	
												43	

NM 38 will have a similar logic to the existing exclusion code '41 – Ineligible Alien (NM)', including FS43 budgets. The system will not modify the FS43 budget regardless of new information in the workflow.

Once a response to the NAC notice is received and verification is provided proving the household should receive SNAP in PA, the caseworker can approve the SNAP budget. If no response is received or the response does not provide the necessary information, the caseworker should reject or close the case. The final disposition is the one that must be reported to NAC via the DED Match Details NAC Verification tab. After that has been done, the hit can be disposed under the Disposition Management tab.

Example: Ms. Smith and her boyfriend Mr. Miller apply for SNAP on May 16. A DX-15 hit is returned for Mr. Miller, who received benefits in New Jersey (NJ) through May 31. The CAO has verified that Mr. Miller's NJ benefit is closed effective May 31. Mr. Miller is only an NM 38 from date of application to the date of closure in NJ. The system will create a Non-Continuous Eligibility (NCE) period of May 16 – June 30, however the caseworker will have to manually adjust these dates to make sure the household receives the correct benefit. The caseworker would create a manual NCE period of May 16 – May 31 and code Mr. Miller as an NM 38 for that period. Ongoing would begin June 1 with Mr. Miller coded as an EB/EW.

NOTE: If the household was eligible for EXFS, a second NCE period would have to be created for June 1 – June 30 to ensure timely issuance of benefits, with ongoing beginning July 1.

NOTE: Always ensure the Program Request Questions screen's "receiving out of state" question is designated 'pending' to trigger the pending item on the PA 253 and the correct expedited failure.

Acceptable proof for verifying a NAC hit

The CAO must determine the appropriate actions to take on the case in order to resolve the NAC match. Case closure date information obtained from another state agency on DX-15 may be used to make an eligibility determination without requiring additional documentation, if it comes from the Benefits End Date or Benefits Terminated Date field in the information provided by the matching state since this information is facilitated through the NAC or other communication between state agencies. However, information beyond the closure date must be independently verified.

NOTE: The information in the daily upload in the field called "Participant Closing Date" is optional and not verified on receipt. DX-15 exchange hits will include the phone number or email for the state so that the worker can reach out in the event that the household needs help verifying the information.

If a NAC match occurs for a mandatory child requesting SNAP, the CAO may accept current proof of custody or residency to resolve the match. For other household members, the CAO should follow existing procedures to verify residency and household composition, including verifying questionable information prior to issuing benefits.

Verification of a NAC hit includes but is not limited to:

- An official document from another state confirming the SNAP case has closed,
- state issued Identification (ID)/Driver's License,
- utility bill for the address in the household members name,
- lease or mortgage for the address that includes the household member,
- mail sent to the address for that person and/or
- voter registration card.

Additional sources of verification may be found in the SNAP Handbook, Chapter 578, Appendix A.

Correspondence

In addition to the new 744/5 EXFS notice, two new notices have been created for NAC. These are to notify individuals identified in a match of the verification needed and potential impact to the case. The NAC requires that these notices be issued to a household within 10 days of a match. These notices are referred to as NAC Notice Option 1 and NAC Notice Option 2:

- NAC Notice Option 1 – This will be triggered by answering the question '*Is anyone requesting SNAP currently receiving SNAP benefits in another state?*' as Pending in Case Open, Program Add, and Reapplication CP workflows.

- The NAC Notice Option 2 – This will be triggered by answering the question *'Is anyone requesting SNAP currently receiving SNAP benefits in another state?'* as Pending in Individual Add and Maintenance CP workflows.

NOTE: The system will fail 042 but the worker will not be able to process the failure until the application is at 30 days.

Similar to the EXFS notice, the NAC Notice Option 1 and 2 will be scheduled when the SNAP Budget Authorization page loads. The new notices will be available in all existing priority languages and the worker will be able to view them in Correspondence. The notices will be sent separately from other notices scheduled for the case. If a NAC notice is already mailed out for a case and then another individual is identified for a match, the system will send a new NAC Match Notice after the worker has navigated to the SNAP Budget Authorization screen.

Monthly Bulk Matching

If an individual is receiving duplicate SNAP benefits but this was not identified in the Application, Renewal and Individual Add process, it will be picked up in the Monthly Bulk Match process. If there is a match on this monthly bulk update, a hit will be created. If there is already a hit on the case for that individual such that the information is received with the same Match ID, then the existing hit will be updated. If a new hit comes in from a different state, a new hit will be created even if there is one already pending. Each case will have its own Match ID. Hits received after the Monthly Bulk Match process should have a notice sent within 10 days of receipt of the hit, allowing the household 10 days to respond. The notice should be sent by:

1. Entering the case in Maintenance.
2. Navigating to the Program Request question.
3. Answering the out-of-state question as 'Pending'.
4. Run Eligibility. The SNAP budget will fail 042.
5. Process to the SNAP Budget Authorization screen and then stop and wait the 10 days for the household to respond.

If the household responds and verifies that the person or persons in the DX-15 hit are no longer receiving SNAP in the other state, the answer to the out-of-state question on the Program Request Questions screen can be changed to 'no' and processed through.

If the household responds confirming the person or persons are receiving in another state, they should be excluded from the SNAP budget on the Individual Program Request screen using the new code 38.

If the household does not respond at all or responds but fails to provide sufficient information to clarify its circumstances, take the following steps:

Semi-Annual Reporting (SAR) Household	The CAO will exclude only the person or persons for whom the NAC match was received using the new code NM 38. The CAO should issue a notice of adverse action and narrate the reason for the action taken.
Non-SAR Household	The CAO will issue a notice of adverse action that terminates the case and narrate the reason for the action.

When a hit it is created as a result of running the exchange and the individual is not requesting or receiving SNAP, the hit is considered invalid and should be resolved by selecting "invalid" as "yes" in the exchange.

NOTE: DX-15 should only be manually requested if the request fails in workflow. In the event of a NAC Communication failure, the caseworker will commit the case as usual. If the DX-15 request fails, the state is still expected to manually check the NAC. Assigned staff in the CAO will have access to the manual check location and caseworkers should follow Operations established procedure in their CAO to request the information and narrate appropriately.

NEXT STEPS

1. Share and review this information with appropriate staff members.
2. Direct questions regarding this Operations Memorandum (Ops Memo) to your Area Manager.
3. This Ops Memo will become obsolete when the changes to procedures are updated in the handbooks.