

**From:** [Balbes, Maribelle - FNS](#)  
**To:** [AFND\\_MARO\\_SNAPMGT](#); [AFND\\_MPRO\\_SNAPMGT](#); [AFND\\_WRO\\_SNAPMGT](#); [AFND\\_MWRO\\_SNAPMGT](#); [AFND\\_SERO\\_SNAPMGT](#); [AFND\\_SWRO\\_SNAPMGT](#); [AFND\\_NERO\\_SNAPMGT](#)  
**Cc:** [FNS-SNAP-FO](#); [Cole, Susan \(Suzy\) - FNS](#); [Alstodt, Raisa - FNS](#); [Marshall, Julie - FNS](#); [Gersten-Paal, Sasha - FNS](#); [Luna, Jessica - FNS](#); [Noble, John \(David\) - FNS](#)  
**Subject:** FW: SNAP Implementation Memo of Section 4032 - Agricultural Act of 2014  
**Date:** Wednesday, February 2, 2022 5:39:10 PM  
**Attachments:** [4032 Policy Memo Final.pdf](#)  
[image001.png](#)

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Good afternoon SNAP Regional Program Directors and Branch Chiefs:

This is a reminder that States must submit their annual written attestations for Section 4032 to you by March 31, 2022. Please send your State agencies a reminder to submit this. Please forward these attestations to National Office ([raisa.alstodt@usda.gov](mailto:raisa.alstodt@usda.gov)) by April 7, 2022 and retain for your own records as well.

In order to meet the reporting requirements specified in Section 4032 of the Act, States must confirm via email to their FNS Regional SNAP Program Director that in the immediately preceding fiscal year (FY 21), they had the appropriate systems in place to meet the requirements of regulations at 7 CFR 272.14 (deceased match) and 273.16(i)(4) (eDRS) and that they conducted the matches required by these regulations. State agencies are welcome to use this exact wording per the attached memorandum, as both regulatory requirements must be attested to in that both the appropriate system was in place and that the matches were conducted as required by those regulations.

Additionally, please remind State agencies of the clarification the national office received from the Office of General Counsel (OGC) as to what constitutes having the “appropriate systems” in place. Having the appropriate system in place means complying with all the related provisions in the corresponding regulation. This would include the following actions: conducting the match, reporting matches, independent verification, notice to the household, and opportunity to contest. Therefore, if the State process is not set up to ensure compliance with all related provisions in the regulation, it would be inaccurate to attest that the appropriate systems are in place in this yearly attestation. If this is the case, please notify National Office of either open ME findings that exist or proceed with the escalation process as described in the FY 2022 National ME-FMR Guide [[Pages - Agencywide Resources \(usda.net\)](#)].

For any questions, please contact Suzy Cole, Acting State Administration Branch Chief.

Thank you,  
Maribelle

**Maribelle Balbes**  
she/her/hers  
Acting Director  
Program Accountability and Administration Division (PAAD)



Supplemental Nutrition Assistance Program  
National Office

**Food and Nutrition Service**  
United States Department of Agriculture  
Phone: 703-605-4272  
Cell: 415-516-5379  
[Maribelle.Balbes@usda.gov](mailto:Maribelle.Balbes@usda.gov)

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**From:** Ward, Ronald - FNS <[ronald.ward@usda.gov](mailto:ronald.ward@usda.gov)>

**Sent:** Tuesday, February 9, 2021 5:06 PM

**To:** AFND\_SERO\_SNAPMGT <[fn-se\\_snapmanagement@usda.gov](mailto:fn-se_snapmanagement@usda.gov)>; AFND\_SWRO\_SNAPMGT <[fn-sw\\_snapmanagement@usda.gov](mailto:fn-sw_snapmanagement@usda.gov)>; AFND\_MARO\_SNAPMGT <[fn-ma\\_snapmanagement@usda.gov](mailto:fn-ma_snapmanagement@usda.gov)>; AFND\_MPRO\_SNAPMGT <[fn-mp\\_snapmangement@usda.gov](mailto:fn-mp_snapmangement@usda.gov)>; AFND\_MWRO\_SNAPMGT <[fn-mw\\_snapmanagement@usda.gov](mailto:fn-mw_snapmanagement@usda.gov)>; AFND\_NERO\_SNAPMGT <[fn-ne\\_snapmanagement@usda.gov](mailto:fn-ne_snapmanagement@usda.gov)>; AFND\_WRO\_SNAPMGT <[fn-w\\_snapmanagement@usda.gov](mailto:fn-w_snapmanagement@usda.gov)>

**Cc:** FNS-SNAP-FO <[FNS-SNAP-FO@usda.gov](mailto:FNS-SNAP-FO@usda.gov)>; Balbes, Maribelle - FNS <[maribelle.balbes@usda.gov](mailto:maribelle.balbes@usda.gov)>; Alstodt, Raisa - FNS <[Raisa.Alstodt@usda.gov](mailto:Raisa.Alstodt@usda.gov)>; Marshall, Julie - FNS <[julie.marshall@usda.gov](mailto:julie.marshall@usda.gov)>; McKenney, Alice - FNS <[alice.mckenney1@usda.gov](mailto:alice.mckenney1@usda.gov)>; Gersten-Paal, Sasha - FNS <[sasha.gersten-paal@usda.gov](mailto:sasha.gersten-paal@usda.gov)>; Luna, Jessica - FNS <[jessica.luna@usda.gov](mailto:jessica.luna@usda.gov)>; Dasgupta, Arpan - FNS <[arpan.dasgupta@usda.gov](mailto:arpan.dasgupta@usda.gov)>

**Subject:** RE: SNAP Implementation Memo of Section 4032 - Agricultural Act of 2014

SNAP Regional Program Directors and Branch Chiefs:

This is a reminder that States must submit their annual written attestations to you by March 31, 2021, attesting to the fact that they had appropriate systems in place to meet the regulatory required data matches identified in the attached implementation memorandum and that they conducted those matches for Fiscal Year 2020.

Please forward a copy of written attestations submitted by State agencies via email to Raisa Alstodt, Program Analyst at [Raisa.Alstodt@usda.gov](mailto:Raisa.Alstodt@usda.gov) in the State Administration Branch **by April 7, 2021**.

Additional reminders:

- Please maintain these annual submissions per the agency's record retention requirements.
- Use existing escalation policy to alert SAB if a State agency fails to comply with the reporting requirement. Failure to comply would include:
  - The State agency fails to submit a written attestation by March 31, 2021.
  - FNS has an open ME finding in Fiscal Year 2020 indicating that the State failed to adhere to 7 CFR 272.14 or 273.16(i)(4).

Questions about the state verification requirement can be sent to Maribelle Balbes, State Administration Branch Chief.

Thank you,  
Ronald Ward

Director, Program Accountability and Administration Division  
Supplemental Nutrition Assistance Program

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**From:** Ward, Ronald - FNS

**Sent:** Thursday, January 30, 2020 2:27 PM

**To:** AFND\_MARO\_SNAPMGT <[fn-ma\\_snapmanagement@usda.gov](mailto:fn-ma_snapmanagement@usda.gov)>; AFND\_MWRO\_SNAPMGT <[fn-mw\\_snapmanagement@usda.gov](mailto:fn-mw_snapmanagement@usda.gov)>; AFND\_SWRO\_SNAPMGT <[fn-sw\\_snapmanagement@usda.gov](mailto:fn-sw_snapmanagement@usda.gov)>; AFND\_MPRO\_SNAPMGT <[fn-mp\\_snapmangement@usda.gov](mailto:fn-mp_snapmangement@usda.gov)>; AFND\_NERO\_SNAPMGT <[fn-ne\\_snapmanagement@usda.gov](mailto:fn-ne_snapmanagement@usda.gov)>; AFND\_SERO\_SNAPMGT <[fn-se\\_snapmanagement@usda.gov](mailto:fn-se_snapmanagement@usda.gov)>; AFND\_WRO\_SNAPMGT <[fn-w\\_snapmanagement@usda.gov](mailto:fn-w_snapmanagement@usda.gov)>; Kain, Erica - FNS <[erica.kain@usda.gov](mailto:erica.kain@usda.gov)>

**Cc:** Shahin, Jessica - FNS <[jessica.shahin@usda.gov](mailto:jessica.shahin@usda.gov)>; Griffin, Laura - FNS <[laura.griffin@usda.gov](mailto:laura.griffin@usda.gov)>; Silbermann, Lizbeth - FNS <[lizbeth.silbermann@usda.gov](mailto:lizbeth.silbermann@usda.gov)>; Cole, Susan (Suzy) - FNS <[susan.m.cole@usda.gov](mailto:susan.m.cole@usda.gov)>; Gersten-Paal, Sasha - FNS <[sasha.gersten-paal@usda.gov](mailto:sasha.gersten-paal@usda.gov)>; Marshall, Julie - FNS <[julie.marshall@usda.gov](mailto:julie.marshall@usda.gov)>

**Subject:** RE: SNAP Implementation Memo of Section 4032 - Agricultural Act of 2014

SNAP Regional Program Directors and Branch Chiefs:

This is your annual reminder that States must submit their annual reports to you by March 31 attesting to the fact that they had appropriate systems in place to meet the regulatory required data matches and that they conducted those matches for Fiscal Year 2019.

This is also a reminder that you should keep and maintain these annual submissions per the agency's record retention requirements as we have received a data call for this information from the House Agriculture Committee and GAO in the past.

Please use existing escalation policy to alert us if a State fails to comply with the reporting requirement.

Thank you,  
Ron

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**From:** Ward, Ronald - FNS

**Sent:** Tuesday, March 5, 2019 8:23 AM

**To:** Hobbs, Rebecca - FNS <[Rebecca.Hobbs@fns.usda.gov](mailto:Rebecca.Hobbs@fns.usda.gov)>; Balbes, Maribelle - FNS <[Maribelle.Balbes@fns.usda.gov](mailto:Maribelle.Balbes@fns.usda.gov)>; Crudup, Dwight - FNS <[dwight.crudup@fns.usda.gov](mailto:dwight.crudup@fns.usda.gov)>; Kamau, Catrina - FNS <[Catrina.Kamau@fns.usda.gov](mailto:Catrina.Kamau@fns.usda.gov)>; Byrd, Vernzel Mosby - FNS <[Vernzel.Byrd@fns.usda.gov](mailto:Vernzel.Byrd@fns.usda.gov)>; Velasco, Sabina - FNS <[Sabina.Velasco@fns.usda.gov](mailto:Sabina.Velasco@fns.usda.gov)>; Fraley, Philip - FNS <[philip.fraley@fns.usda.gov](mailto:philip.fraley@fns.usda.gov)>; Jones, Elaine - FNS <[Elaine.Jones@fns.usda.gov](mailto:Elaine.Jones@fns.usda.gov)>; Mikkelson, Julie - FNS <[JULIE.MIKKELSON@fns.usda.gov](mailto:JULIE.MIKKELSON@fns.usda.gov)>; Cundari, Melissa - FNS <[MELISSA.CUNDARI@fns.usda.gov](mailto:MELISSA.CUNDARI@fns.usda.gov)>; MacMartin, Sandra - FNS <[Sandra.MacMartin@fns.usda.gov](mailto:Sandra.MacMartin@fns.usda.gov)>; McCall, Brian - FNS <[Brian.McCall@fns.usda.gov](mailto:Brian.McCall@fns.usda.gov)>; Malveaux, Eugene - FNS <[Eugene.Malveaux@fns.usda.gov](mailto:Eugene.Malveaux@fns.usda.gov)>; Ratchford, Eric - FNS <[Eric.Ratchford@fns.usda.gov](mailto:Eric.Ratchford@fns.usda.gov)>; Jenkins,

Bill - FNS <[Bill.Jenkins@fns.usda.gov](mailto:Bill.Jenkins@fns.usda.gov)>; Gagliardi, David - FNS <[David.Gagliardi@fns.usda.gov](mailto:David.Gagliardi@fns.usda.gov)>; Brathwaite, Bonnie - FNS <[Bonnie.Brathwaite@fns.usda.gov](mailto:Bonnie.Brathwaite@fns.usda.gov)>; Rodriguez, Alonso - FNS <[alonso.rodriguez@fns.usda.gov](mailto:alonso.rodriguez@fns.usda.gov)>; Henschel, Matthew - FNS <[matthew.henschel@fns.usda.gov](mailto:matthew.henschel@fns.usda.gov)>

**Cc:** Shahin, Jessica - FNS <[Jessica.Shahin@fns.usda.gov](mailto:Jessica.Shahin@fns.usda.gov)>; Cohen, Jeff - FNS <[Jeff.Cohen@fns.usda.gov](mailto:Jeff.Cohen@fns.usda.gov)>; Griffin, Laura - FNS <[Laura.Griffin@fns.usda.gov](mailto:Laura.Griffin@fns.usda.gov)>; Silbermann, Lizbeth - FNS <[Lizbeth.Silbermann@fns.usda.gov](mailto:Lizbeth.Silbermann@fns.usda.gov)>; Duffield, Jane - FNS <[Jane.Duffield@fns.usda.gov](mailto:Jane.Duffield@fns.usda.gov)>; Cole, Susan (Suzy) – FNS <[Susan.M.Cole@fns.usda.gov](mailto:Susan.M.Cole@fns.usda.gov)>; Gersten-Paal, Sasha - FNS <[Sasha.Gersten-Paal@fns.usda.gov](mailto:Sasha.Gersten-Paal@fns.usda.gov)>; Conroy, Mary Rose - FNS <[MaryRose.Conroy@fns.usda.gov](mailto:MaryRose.Conroy@fns.usda.gov)>

**Subject:** FW: SNAP Implementation Memo of Section 4032 - Agricultural Act of 2014

**Importance:** High

SNAP Regional Program Directors and Branch Chiefs:

This is your annual reminder that States must submit their annual reports to you by March 31 attesting to the fact that they had appropriate systems in place to meet the regulatory required data matches and that they conducted those matches for fiscal year 2018.

This is also a reminder that you should keep and maintain these annual submissions per the agency's record retention requirements. You may recall we received a data call for this information from the House Agriculture Committee during last year's Farm Bill deliberations.

Please use existing escalation policy to alert us if a State fails to comply.

Thank you,  
Ron

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**From:** Ward, Ronald - FNS  
**Sent:** Thursday, March 08, 2018 4:55 PM  
**To:** AFNG\_SNAP NO RO LEADERSHIP  
**Subject:** FW: SNAP Implementation Memo of Section 4032 - Agricultural Act of 2014  
**Importance:** High

SNAP Regional Program Directors and Branch Chiefs:

This is your annual reminder that States must submit their annual reports to you by March 31 attesting to the fact that they had appropriate systems in place to meet the regulatory required data matches and that they conducted those matches for fiscal year 2017.

This is also a reminder that you should keep and maintain these annual submissions per the agency's record retention requirements. I would not be surprised at some point if there is a data call or audit by GAO/OIG to review this information.

Thank you,  
Ron

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**From:** Ward, Ronald - FNS  
**Sent:** Wednesday, March 01, 2017 8:05 AM  
**To:** AFNG\_SNAP NO RO LEADERSHIP  
**Subject:** FW: SNAP Implementation Memo of Section 4032 - Agricultural Act of 2014  
**Importance:** High

SNAP Regional Program Directors/Branch Chiefs:

As we begin March, I am forwarding a reminder that States must submit their annual report to you by March 31 attesting to the fact that they had appropriate systems in place to meet the regulatory required data matches and that they conducted those matches for fiscal year 2016.

This reporting requirement was implemented in the last Farm Bill. FNS has no discretion on whether or not to penalize a State for failing to comply with this reporting requirement. The statute only provides FNS with discretion as to the amount of the financial penalty. You may wish to proactively remind your States of this reporting requirement if you have not already.

Thank you,  
Ron

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**From:** Ward, Ronald - FNS  
**Sent:** Wednesday, March 23, 2016 3:02 PM  
**To:** AFNG\_SNAP NO RO LEADERSHIP  
**Cc:** Thompson, Clyde - FNS; Stewart, Kelly - FNS  
**Subject:** RE: SNAP Implementation Memo of Section 4032 - Agricultural Act of 2014

This is a reminder that the first report from States attesting to the fact that they had appropriate systems in place to meet the regulatory required data matches and that they conducted those matches is due to your office by March 31. We are providing the States with flexibility as to how that report should be submitted.

I am sending this reminder to make sure you are aware of the implications if a State fails to comply. This provision of the Farm Bill was unusually prescriptive in that it does not provide any discretion to USDA on whether a State should be penalized for failing to comply. The only discretion available to USDA is the amount of that penalty.

Thus, it is imperative that your States submit a report as described in the attached memorandum by the March 31<sup>st</sup> deadline.

Thank you,  
Ron

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**From:** Ward, Ronald - FNS  
**Sent:** Tuesday, May 05, 2015 4:33 PM  
**To:** AFNG\_SNAP NO RO LEADERSHIP  
**Cc:** Thompson, Clyde - FNS; Stewart, Kelly - FNS; Brown, Veronica - FNS  
**Subject:** SNAP Implementation Memo of Section 4032 - Agricultural Act of 2014

Attached is a memorandum providing State agencies with further guidance on implementing Section 4032 of the Agricultural Act of 2014 (Farm Bill). In the initial implementation of the Farm Bill, FNS advised States that this provision should not be implemented until Federal rulemaking occurs. After further review, FNS has determined that this section can be implemented without additional rulemaking. This memorandum advises States that in order to meet the reporting requirements specified in this Section, States must confirm via email to their FNS Regional SNAP Program Director that in the immediately preceding fiscal year, they had the appropriate systems in place to meet the requirements of regulations at 7 CFR 272.14 and 273.16(i)(4) and that they conducted the matches required by these regulations.

The first report, covering Fiscal Year 2015, is not due to each Region until March 31, 2016.

Please share this information with your State agencies. The State Administration Branch is planning a conference call with the Regions to address any questions that you may have regarding this provision. Additional information will be forthcoming regarding a call.

Thank you,  
Ronald Ward, Director  
Program Accountability and Administration Division  
Supplemental Nutrition Assistance Program  
USDA, Food and Nutrition Service  
PH: 703-305-2523