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## I. General Information

The Louisiana Department of Children and Family Services (DCFS) has received a grant as part of the Office of Management and Budget (OMB) Partnership Fund for Program Integrity Innovation to collaborate with four other participating states in the pilot implementation of a new eligibility integrity system called the National Accuracy Clearinghouse (NAC). The purpose of NAC is to establish an interstate database of program information that allows states to exchange information across state lines, in real or near-real time, to reduce overpayments in SNAP (or DSNAP) benefits resulting from dual participation. A statewide pilot implementation is scheduled for June 2, 2014. States currently participating in the NAC pilot are Louisiana (LA), Alabama (AL), Florida (FL), Georgia (GA), and Mississippi (MS). The initial phase of the pilot will be completed by a team in State Office. Public Consulting Group (PCG) has been contracted to evaluate the NAC project to determine a possible expansion of NAC to include additional states.


## II. Initial Matches (Hits)

State Office team members will process all initial NAC hits. On the first day of implementation of the pilot project, an initial daily Match Search History file of all SNAP recipients will be submitted to the NAC using the client's name, date of birth, and social security number. Shortly after implementation, each participating state will receive a file listing clients receiving SNAP benefits in another state based on these criteria.

Within ten calendar days of receipt of the initial file, State Office team members will send an OFS 18C, Client Contact Letter, to the household to request verification of residency in Louisiana. If the household fails to respond to the request or fails to provide sufficient information to determine residency, a Notice of Adverse Action will be sent to the household proposing removal of the dual participant household member or proposing closure of the case, whichever is applicable. State Office staff will contact the other state to determine which state is responsible for completion of the recovery of duplicate benefits. The state that certified the case or added the household member while the case was active or the household member was included in an active case in the other state is responsible for completing the recovery action.

## III. Clearance Summary Changes - NAC Matches (Hits)

Parish Office staff will be responsible for processing dual participation matches occurring after the initial implementation of NAC. All household members must be cleared for dual participation with all SNAP applications pended June 2, 2014, or later and all July 2014 SNAP redeterminations and Simplified Reports (SR), and before adding any new household member. The Clearance Summary (CS) has been updated to include hits of dual participation that occur after the initial implementation of NAC. NAC matches on the CS will include the following data element fields:

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- Name - the person identified as being included in a participating state's active case,
- PID - the person's social security number,
- CID - the case ID number,
- State - the other participating state,
- Benefit Month - the month that the person received benefits in the other participating state. The current month will be displayed if the match occurs on or before the 15th of the month and the next benefit month if the match occurs after the 15th of the month,
- Benefit Type - SNAP benefits,
- Eligibility Indicator - the person was considered to be eligible for benefits in the other state,
- Eligibility Start Date - the date the person started receiving benefits in the other state,
- Match Code - a Match Code is displayed on the CS to describe the Search Elements used to generate a match within the NAC. The Single Match codes are listed below:

<b>Match Code</b>	<b>Description</b>
N	Full Name
V	Last Name + Partial First
W	Last Name
S	Full SSN
P	Probable SSN
D	DOB
B	Possible DOB
A	Street Address
C	City/State Address
Z	Zip Address

NAC uses various Match Code combinations to indicate the level of confidence in the matches resulting from the search criteria. The Match Code combinations are listed below along with their ranking:




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Rank	Match Code Combinations	Descriptions
1	NSD	Name, SSN, DOB
2	VSD	Partial Name, SSN, DOB
3	NSB	Name, SSN, Possible DOB
4	VSB	Partial Name, SSN, Possible DOB
5	NPD	Name, Probable SSN, DOB
6	VPD	Partial Name, Probable SSN, DOB
7	NPB	Name, Probable SSN, Possible DOB
8	VPB	Partial Name, Probable SSN, Possible DOB
9	S	SSN
10	NDACZ	Name, DOB, Address, City, Zip
11	NDAC	Name, DOB, Address, City
12	NDAZ	Name, DOB, Address, Zip
13	VDACZ	Partial Name, DOB, Address, City, Zip
14	VDAC	Partial Name, DOB, Address, City
15	VDAZ	Partial Name, DOB, Address, Zip
16	NBACZ	Name, Possible DOB, Address, City, Zip
17	NBAC	Name, Possible DOB, Address, City
18	NBAZ	Name, Possible DOB, Address, Zip
19	VBACZ	Partial Name, Possible DOB, Address, City, Zip
20	VBAC	Partial Name, Possible DOB, Address, City
21	VBAZ	Partial Name, Possible DOB, Address, Zip

In Louisiana, Match Code combinations with rankings of 1 through 5 listed above will be considered a qualified match of dual participation and must be acted upon. This means that data elements entered into the system (name, social security number, date of birth, etc.) have come back with enough information to be considered a match with our record.

When Match Code combinations of rankings 1 through 5 are contained within the Match Code combination displayed on the CS, it is considered a qualified match. For example, the Match Code combination of NSD is considered a qualified match. If Match Code combination NSDAZ is displayed on the CS, then it is a qualified match since it contains NSD.

The CS will not display the ranking numbers of Match Code combinations. It will display **any** Match Code combination received from NAC. No action is required on any Match Code combination that does not contain NSD, VSD, NSB, VSB, or NPD within the combination. Therefore, a careful analysis of the Match Code combination is needed to determine if the Match Code combination is a qualified match.

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- Match Score - a Match Score is displayed on the CS when the matching mechanism within NAC identifies the data elements with an amount other than zero. A Match Score should not be considered when taking action on the case.
- Contact Name - the other participating state's contact person, and
- Contact Email - the contact person's email address.


Before adding any new household member to a SNAP case, the member must be cleared for dual participation through NAC. The "Search Additional Member" link in CS is not programmed to complete NAC clearances for new household members not already included in the CS. When a household member(s) is not included in the CS, a manual search must be completed. Action must be taken as follows:

- The worker will inform their supervisor by email that a manual NAC clearance is needed. The email must include the member's name, date of birth, and social security number.
- The supervisor will forward the email to the appropriate SNAP/CCAP Regional Program Consultant requesting the manual NAC clearance.
- The SNAP/CCAP Regional Program Consultant, who has immediate "look-up" capability in NAC, will within two business days access the NAC Portal directly to clear the member for dual participation.
- The SNAP/CCAP Regional Program Consultant will send a confirmation email back to the supervisor with results of the manual NAC clearance and copy the worker and Program Operations Manager (POM).
- A Case Note must be completed to document all case action.

A Web-based Informational Memoranda is forthcoming detailing the changes to CS because of the NAC.

#### **IV. Dual Participation Prevention Matches (Hits) - Application and Redetermination**


Dual participation hits that are qualified matches are considered verified upon receipt at application and redetermination. Action must be taken on the application or case when the redetermination application has been submitted as follows:

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- **Do not** certify the case on the same day the application is pended in order to allow CS to run in the nightly batch and information to be available to view on the next day. If the application must be certified on the same day it is pended, a manual NAC clearance must be completed as outlined in Section III.
- Document the report of dual participation and the date of the report as a Case Note.
- Determine the effect of the reported information on the household's eligibility and benefits based on the Match Search History hit with the other state and Application Processing Procedures in [C-620-SNAP](#) for applications or Redetermination Processing Procedures in [C-720-SNAP](#) for redeterminations.
- During or immediately following the interview, send an email to the contact person in the other state(s) to remove the household member or to close the case, whichever is applicable. Advance Notice of Adverse Action **is not** required when the case is closed in the other state; however, Advance Notice of Adverse Action is required to remove a household member.

The email to the other state must contain:

- The Subject Line - "NAC Dual Participation - (Date of hit)"  
The date of the hit is the "As of Date" listed on the NAC panel in the CS.
- The message should state "The following individual, currently receiving benefits in your State, has applied for benefits in Louisiana."
  - Include the following data elements:
    - Name
    - Date of Birth
    - Case ID – (the other state's Case ID Number)
    - Client ID Number – (the other state's Client ID Number)
    - Case Benefit Month
    - Search Benefit Month
- When the hit is received on or before the 15th of the month for applications, the message should state, "Please close the case/remove the individual from the case for the next month, so benefits can be issued in Louisiana, starting with the first of next month. Please respond within 2 business days as to what action was taken and for which month in your State."
- For redeterminations and when the hit is received after the 15th of the month for applications, the message should state, "Please respond within 2 business days as to what action was taken and for which month in your State."

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- Include your identifying information in order to receive a response back from the other state. Include your name, email address, and work phone number (not the Customer Service Center's phone number).
- When the hit is received on or before the 15th of the month for applications, and the other state is notified as required, the change is effective for the next benefit month. If no response is received from the other state, assume that the change is effective the following month. If there is a delay in notifying the other state, request that the other state send a response indicating the effective date of the change in their state.

Process the certification by including the member(s) effective the month after removal or change the 'Cert From' date on LAMI to the 1st of the month following the closure of the case, whichever is applicable.


Example: A mother applies for benefits on Monday, 06/02/14 for herself and 3 children and is interviewed on Friday, 06/06/14. Hits are received on CS for all household members showing all household members are included in a case in Mississippi. An email is sent on Friday, 06/06/14 to the contact person in Mississippi requesting the client's case be closed in their state. No response is received from Mississippi. Change the "Cert From" date on LAMI to 07/01/14 and process the certification in Louisiana.

- For redeterminations and when the hit is received after the 15th of the month for applications, and the other state is notified as required, the change is effective for the next possible benefit month based on the actions of the other state (after expiration of Advanced Notice of Adverse Action, if required). Action must be taken by and a response received from the other state within 2 business days to confirm the action taken on their case.

After confirmation of removal of the member(s) or closure of the case, process changes to the case based on information reported on the redetermination application.

Example: A mother applies for benefits on Monday, 06/16/14 for herself and 3 children and is interviewed on Friday, 06/20/14. Hits are received on CS for 2 of the children showing they are included in an active case in Mississippi. An email is sent on Friday, 06/20/14 to the contact person in Mississippi requesting removal of the 2 children from the case in their state. A confirmation response is received from Mississippi on Tuesday, 06/24/14 stating they have removed the 2 children from their case effective 08/14. If otherwise eligible, certify the case in Louisiana with the mother and the child who was not receiving benefits in Mississippi for June and July and include the other 2 children in the case effective August.



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Example: A client submits their redetermination application online on 07/02/14 and is interviewed on 07/09/14 for her July 2014 redetermination. She included herself and 3 children as household members. Hits are received on CS for all household members showing all household members are included in a case in Mississippi. An email is sent on 07/09/14 to the contact person in Mississippi requesting they close the client's case in Mississippi. A confirmation response is received from Mississippi on 07/11/14 stating they have closed the case in Mississippi effective 08/14. If otherwise eligible, recertify the case effective 08/14 including all household members.


- For redeterminations, determine which state is responsible for completing the recovery of duplicate SNAP benefits. The state that certified the case or added the household member while the case was active or the household member was included in an active case in the other state is responsible for completing the recovery action.
- Complete a Case Note to document all case activity.

#### **V. NAC Matches (Hits) - Simplified Report (SR)**

Parish Office staff will be responsible for processing NAC matches at SR. The CS has been updated to include the NAC matches at SR, however, according to guidance received from FNS, NAC matches identified at SR are **NOT** considered verified upon receipt, since further information or verification will be required from the household. NAC matches on the CS at SR will include the same data element fields as identified above in Section III.

When an SR is submitted, the CS must be reviewed to determine if the hit is a qualified match. Action must be taken on a case with a qualified match as follows:

- Document the report of dual participation and the date of the report as a Case Note.
- Determine the effect of the reported information on the household's eligibility and benefits based on the Match Search History hit on the CS and SR Processing Standards Procedures in [S-410-SNAP](#).
- Send an [OFS 13SI](#), Simplified Reporting Notice of Incomplete Filing, to the household requesting information. A semi-automated notice is recommended, however, if a manual notice is sent, a copy of the [OFS 13SI](#) must be scanned into OnBase. In addition to any other information that is needed for an SR that is submitted, but is incomplete, the notice should state that:
  - A computer match has been received that (duplicate member(s) name) is/are receiving benefits in another state.

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- You must provide proof of residency in Louisiana for the above person(s).
- In order to continue receiving benefits in Louisiana, you must provide proof that your case has been closed in the other state or that the person(s) listed above has been removed from the case in the other state.

The case must be placed in active pending closure (AC) status using Closure Code 05 (failed to provide a complete Simplified Report by the due date) and Notice Suppression Code 1 (manual notice - adverse action) on the same day the [OFS 13SI](#) is completed.

Residency in Louisiana can be verified by sources such as rent, mortgage, or utility receipts. When residency cannot be verified by the readily available evidence listed above, it can be verified by contact with the landlord, neighbors, relatives, or other sources of reliable information designated by the household. It can also be verified by scheduled home visits to observe the client's personal effects and living arrangements.

- If the household fails to respond or fails to provide sufficient information to determine residency and all household members or the head of household is involved in the dual participation match, the case will automatically be closed at the expiration of the [OFS 13SI](#).
- If the household fails to respond or fails to provide sufficient information to determine residency and **not** all household members or the head of household is **not** involved in the dual participation match, do not allow the case to automatically close if all other eligibility requirements are met. Instead, remove the case from AC status, exclude the dual participant household member(s) from the case, and process any other changes reported at SR.
- Send an email to the contact person in the other state(s) regarding action taken on the case within 5 business days from the expiration date of the [OFS 13SI](#).
- If the household provides the requested information, which verifies that all household members identified in the match are residents of Louisiana and that their case has been closed or the member(s) has been removed from the case in the other state, the SR may be processed with the member(s) included in the household.
- If the household reports that the member(s) or the entire household are no longer residents of Louisiana or the household provides verification that they are residents of Louisiana but indicate that their case has **not** been closed or the member(s) has **not** been removed from the case in the other state, exclude the member(s) or close the case, whichever is applicable, and send the household Concurrent Notice of Adverse Action.
- Determine which state is responsible for completing the recovery of duplicate benefits.



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- Complete a Case Note to document all case activity.


## **VI. Contact Received From Other State Due to NAC Match (Hits)**

Dual participation matches reported by another state will be routed through Inquiry Services. Inquiry Services will send an email regarding the dual participation matches to the worker, with a copy to the supervisor and POM, and enter a Case Note in CAFÉ. The worker must take the following action on the report of the match depending on what is reported:

- Document the reported change and the date of the report as a Case Note.
- Determine the effect of the reported change on the household's eligibility and benefits based on the information provided by the other State and Procedures for Action on Changes in [C-820-SNAP](#).
  - If an email from Inquiry Service is received reporting a NAC match from another participating state and the other state requests that we remove a household member(s) or close the case in Louisiana because they have verified the client lives in their state, within 2 business days, take action to exclude the member(s) or close the case, whichever is applicable, and send a response to the other state to confirm the action taken on the case. Advance Notice of Adverse Action to remove the member(s) or Concurrent Notice of Adverse Action to close the case must be sent. Determine which state is responsible for completing the recovery of duplicate benefits, if applicable. If Louisiana is responsible for the recovery action, then an [OFS 20CD](#) must be completed. Send form [OFS 82](#), Out-of-State Inquiry, to the other state to verify the client's receipt of duplicate benefits.
  - If an email from Inquiry Service is received reporting a NAC match from another participating state and the other state reports that they have closed the case in their state or removed the household member(s) because the client failed to respond or because the client reported the household or member(s) has moved to Louisiana, determine which state is responsible for completing the recovery of duplicate benefits, if applicable. If Louisiana is responsible for the recovery action then an [OFS 20CD](#) must be completed. Send form [OFS 82](#) to the other state to verify the client's receipt of duplicate benefits.
- Complete a Case Note to document all case activity.

## **VII. July 2014 SRs and July SNAP Redeterminations**

When a July 2014 SR or July SNAP redetermination application has been submitted and there is a hit for dual participation displayed on the CS, the worker must check Case Notes to determine if a State

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Office team member has already taken action on the hit during the initial NAC implementation. If a team member has already taken action on the hit, workers will not be required to contact the client again regarding the dual participation. If the hit was not previously cleared during the initial implementation of NAC, workers should follow procedures outlined in Section IV.

### **VIII. Recovery Claims**

Fraud and Recovery staff will complete the [OFS 20CD](#) on dual participation claims resulting from the **initial** NAC hits. Parish office staff will be responsible for the completion of claims resulting from ongoing dual participation hits. These claims must be completed timely according to procedures in [F-100-SNAP](#). The form [OFS 82](#) has been revised to assist staff in securing written documentation of the client's receipt of benefits in another state. The state that certified the case or added the household member while the case was active or the household member was included in an active case in the other state is responsible for completing the recovery action.

Please contact the appropriate SNAP/CCAP Regional Program Consultant if you have questions.