Service Chapter: SNAP
Effective Date: November 5, 2026

Overview

Removal of SNAP Policy Section 209 – NAC from the current manual.

Updates to E&T Referrals

Description of Changes

1. 209 – NAC – National Accuracy Clearinghouse - Removal

Removing SNAP Policy Section 209 – NAC from the active online manual.

2. 301 Work Registration Overview - Change

BEST is no longer a SNAP Employment and Training (E&T) provider. All new voluntary E&T referrals must be directed to NDWORKS statewide, including Cass, Burleigh, and Morton counties.

Effective November 5, 2026, do not select BEST from the E&T referral dropdown menu. Until BEST is removed from SPACES, staff must select NDWORKS for all E&T referrals.

NOTE: The SPACES team is updating the E&T referral screen to remove BEST as an available option and reviewing existing referrals to BEST. Until that change is made, staff must select NDWORKS.

Policy Section Updates

1. 209 – NAC – National Accuracy Clearinghouse - Removal

Overview

The NAC interim final rule promulgates the requirements of the Agriculture Improvement Act of 2018 (2018 Farm Bill) to establish the NAC for the purpose of preventing multiple issuances of SNAP benefits to an individual by more than one State agency simultaneously. State agencies are required to share information about SNAP participants with the **Food and Nutrition Services (FNS)**, conduct matches against the NAC to discover and prevent interstate duplicate participation, and take appropriate actions when matches are found.

The NAC is an interface that will be part of Integrated Eligibility System. This inquiry will show if households have or have had SNAP in the following states: Arkansas, Georgia, Illinois, Iowa, Kansas, Kentucky, Louisiana, Missouri, Montana, New Mexico, Ohio, Pennsylvania, Tennessee, Utah and Wisconsin (other states will be added a later date). All other states must comply by October 2027.

Reporting Requirements

1. The State Agency must provide information for each active SNAP **participant** to the NAC according to procedures and formats established by FNS. For the purposes of the NAC, an active SNAP participant is defined as an individual who is approved to receive benefits for the **benefit month** in which the State agency is uploading the data. The State Agency shall establish procedures to ensure the information provided is accurate and only includes active participants.
2. For each individual, The State Agency must report the following identifying information, referred to as NAC data matching elements, to the NAC: name, Social Security number, and date of birth. The State Agency must transmit the NAC data matching elements to the system per the process specified by FNS. The NAC data matching elements are used by the NAC to determine the existence of positive matches.
3. The State Agency shall also report the following information: participant ID and, when applicable, a vulnerable individual flag. All information shall be reported in accordance with procedures provided by FNS. Eligibility Workers must comply with policy 504 Social Security Number, in instances where a Social Security number is not available.
    a. A vulnerable individual flag is used to identify when precautions must be taken to protect the individual's information in the event of a match. A vulnerable individual can self-identify during the **application** or recertification process or may be identified by the State Agency on a discretionary basis using the criteria in section 3(b) of this policy.

b. A vulnerable individual, for the purpose of the NAC, includes but is not limited to, those who would be endangered by the dissemination of their information, regardless of their age or gender, such as a resident of a shelter for battered women and children, a resident of a domestic violence shelter, or a person who self-identifies as fleeing domestic violence at any point during application, recertification, certification, or addition of a new household member. Vulnerable individuals should be marked in the integrated eligibility system.

4. North Dakota HHS shall maintain the security, privacy, and accuracy of information submitted to the NAC, including ensuring that information provided to the NAC follows the standards and procedures provided by FNS and only includes active SNAP participants.

Use of Match Data

1. Prior to conducting a NAC query at application, recertification, or the addition of a household member, the State Agency shall follow **verification** procedures described in SNAP 504 Social Security Number and SNAP 103 Verifications for residency and identity. After following these verification procedures, The State Agency shall conduct a NAC query on the individual applying, recertifying, or being added to a household.
2. When the State Agency receives a positive match from a NAC query at application, recertification, or when adding a household member:
    a. The Eligibility Worker shall have 10 days from the date the match is received to initiate action to resolve the match and notify the other State agency of the initiated action.
    b. The State Agency must resolve the match to determine the appropriate actions to take on the case. To resolve a match, the State Agency may use information known to the State Agency, must verify any questionable information in accordance with SNAP 1002 Reporting Requirements, and must notify the individual of the match. The State Agency may not take any action to deny, terminate, suspend, or reduce SNAP benefits based on information received from the NAC until the information has been verified by the State Agency and the individual has been provided notice of the match and an opportunity to respond to the notice, in accordance with SNAP 103 Verifications.
3. Any communication or notice resulting from a NAC match must not include the location of the individual(s).
4. If the Eligibility Worker needs more information to resolve the match or if the information it has could lead to a denial of benefits or other adverse action on the case, the State Agency shall provide a written notice of match results that clearly explains what information is needed from the household and the consequences of failing to respond within the timeline provided in the notice. The notice must

afford at least 10 days from the date the notice is mailed for a response. The notice will be generated automatically when a match is received.

5. After The State Agency has determined the appropriate disposition of the case, it shall promptly share the resolution information with the other state agency.
6. Timeline standards must be followed for normal and expedited processing as applicable. A lack of timely action or communication between state agencies must not delay the determination of benefits for an individual or household.
    - For Expedited benefits, only identity is required to be verified. The NAC process will still allow expedited benefits to be approved without actual proof of residency and SSN. Verify that the out of state SNAP case is closed before issuing expedited SNAP benefits in North Dakota, unless a vulnerable household. The NAC will trigger before allowing ongoing benefits to be approved.
    - When identity, residency, and SSN can be verified within the expedited processing timeframe and the NAC query results in a match of an individual in the household currently receiving benefits in another state, expedited service timeliness standards no longer apply. Take action to resolve the NAC match before issuing SNAP benefits in North Dakota.
    - When residency and SSN cannot be verified within the expedited processing timeframe, postpone verifications and make expedited benefits available to the household no later than the 7th calendar day following the date the application is filed and resolve the NAC match before additional benefits are issued.
7. The NAC shall automatically conduct bulk matches on a monthly basis of the NAC data matching elements provided by all participating state agencies from the daily upload of active SNAP participants to discover existing duplicate participation and shall provide notifications to State agencies when matches are found for participants in their state.
8. If the State Agency receive information related to a NAC data match during the **certification period** for an individual currently participating in SNAP in the state of North Dakota, it must initiate action to resolve the match and communicate with the other state agency within 10 days of the match notification. Information related to a NAC data match that may be received during the certification period includes:
    a. Notification of data matches directly from the NAC indicating that an active SNAP participant is receiving benefits in another State; and
    b. Communication from another State agency based on an NAC data match indicating that an active SNAP participant is part of an **applicant** household or was added to an active household in another State.
9. When the Eligibility Worker receives a NAC match from another state, the household must be sent a notice of match results combined with a notice of adverse action.

a. The notice of adverse action must provide an opportunity to contest the information received and must allow the household no fewer than ten (10) days to provide required verification.
b. Any communication with the household, including a written notice, must not include the location of the individual(s) identified in a match and must follow bilingual requirements.

10. After the Eligibility Worker has determined the appropriate disposition of the case, they shall share the resolution with the other State agency.
11. Eligibility workers must report and **document** in the narratives all instances of matches and the actions taken to resolve them.
12. North Dakota shall provide for the establishment and collection of claims as appropriate.
13. Information obtained from the NAC is subject to the disclosure provisions in SNAP Appendix E. The State Agency shall not use information obtained from the NAC for any purpose other than to prevent duplicate participation.

2. 301 Work Registration Overview - Change

Overview

At **application** and application for **review**, the **household** must cooperate in providing sufficient information regarding employment status and availability for work. The eligibility worker must explain to the **applicant**/**participant** the consequences of a household member quitting a job, reducing hours of employment or failing to comply with other work registration requirements.

Work Registration
Written and Verbal Rights and Responsibilities
Exemptions from Work Registration
Loss of Exempt Status
SNAP Employment and Training (E&T)

The E&T program provides participating individuals opportunities to overcome barriers, gain skills, training or experience and participate in activities that will improve their employment prospects and reduce their reliance on SNAP benefits. In North Dakota, E&T participation is voluntary. All participants that choose to participate in E&T will receive case management services, must participate in at least one E&T component, along with receiving supportive services. There are two E&T programs, BEST and NDWORKS. NDWORKS is the statewide voluntary E&T program.

- BEST is a voluntary program operated in Cass, Burleigh and Morton County.
- NDWORKS is a statewide voluntary program.

  Effective November 5, 2026: BEST is no longer an E&T provider. Do not select BEST from the SPACES referral dropdown, even if it remains visible. Select NDWORKS for all E&T referrals. The SPACES team is updating the referral screen and reviewing existing BEST referrals.

Voluntary E&T Programs

A voluntary E&T Program provides individuals the opportunity to voluntarily participate in activities to improve their employment prospects by gaining skill through education, training, experience, and supervised job search activities. Individuals may volunteer to be referred and participate. An individual who is referred as a voluntary participant that then chooses not to participate, will not be subject to the non-compliance disqualifications.

~~Individuals who volunteer for E&T are referred to a voluntary E&T program based on the human service zone in which they reside. Those in Cass, Burleigh and Morton County should be referred to BEST, unless they request to participate in NDWORKS. All other counties will be referred to NDWORKS, since BEST is only available in Cass and Burleigh County.~~ Individuals who volunteer for SNAP E&T must be referred to NDWORKS, regardless of the human service zone in which they reside.

Screening for E&T Referrals

E&T Components

Eligibility Worker Responsibilities

If the Eligibility worker determines the participant will be a good fit, they must carry out the following procedures for all E&T participants:

- If an individual wants to participate in E&T, refer them to the appropriate E&T program using the program-specific referral:
  - NDWORKS Employment and Training Orientation Referral~~, or~~
  - ~~BEST Employment and Training Orientation Referral~~
- ~~If an individual volunteers and resides in Cass, Burleigh, or Morton Human Service Zones (HSZ), the eligibility worker will refer them to the BEST program, unless they specifically request to volunteer for NDWORKS.~~
- ~~All individuals volunteering and residing outside of Cass, Burleigh, or Morton HSZ will be referred to NDWORKS.~~
  Refer all individuals who volunteer for E&T to NDWORKS, regardless of human service zone.
- Notify the E&T case manager if a participant's SNAP case closes, along with adding a narrative to the case.
- When a provider returns an ill-suited referral. Take appropriate action on SNAP case, by re-screening the client for any other possible work registration and/or ABAWD exemptions.

** See the integrated eligibility system Help for generating a referral.*

Participant Responsibilities

E&T Case Manager Responsibilities

E&T case managers must:

- Conduct orientation sessions.
  - ~~BEST and~~ NDWORKS case managers will contact the participant within 7 days of the receipt of Form SNAP Employment and Training Program

Referral to schedule the orientation and provide the date and time of orientation to the participant.

- Inform the eligibility worker when a participant gains employment or when an ABAWD participant has hours in a qualifying component that may count toward the 20-hour-per-week ABAWD requirement.
- Submit monthly program tracking spreadsheets to the SNAP Policy no later than 5 calendar days after the end of each calendar month.
- Complete a formal assessment and develop an employment plan specific to the participant. The employment plan must be updated monthly, at a minimum.
- Provide monthly case management, including weekly contact with the participant.
    - Part of case management is ensuring an individual is placed in a component within a timely manner and always participating in a component.
- Contact with the eligibility worker monthly to verify a participant continues to receive SNAP. Monthly contact can be via telephone or email.
- Submit monthly participant reimbursements requests along with receipts to the State Office using the SFN471 – Vendor Payment Authorization and Request for Payment for Goods and Services to the State Office no later than 5 calendar days after the end of each calendar month.
- If a participant become disengaged for a period of 30 days, they will be removed from the E&T program. If at any point after those 30 days the participant engages, a new referral will be required.
- E&T case managers also have the authority and responsibility to determine if an individual is ill-suited for E&T services. If a case managers determine an individual is ill-suited, they can refer the individual back to the human service zone office. Eligibility workers will reevaluate the individual and take appropriate action on the SNAP case. This process is referred to as a provider determination.
- Make a recommendation to the EW if they feel that a participant is ill-suited for E&T services. If the case manager feels the participant is ill-suited, they must refer the participant back to the human service zone. EW's must reevaluate the participant and take the appropriate action on the participant's SNAP case. This process is referred to as a provider determination.

Participant Reimbursements