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Update to Feasibility Study on Implementing SNAP in Puerto Rico

Implementation Plan

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Executive Summary

This implementation plan presents results of a U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) study to assess the changes and costs needed to operate the Supplemental Nutrition Assistance Program (SNAP) in Puerto Rico and to develop a detailed plan for implementation. FNS administers SNAP in all 50 States, the District of Columbia, and 2 of the 5 U.S. territories—Guam and the U.S. Virgin Islands. Puerto Rico, the Commonwealth of the Northern Mariana Islands, and American Samoa each receive a block grant for operating a nutrition assistance program. In Puerto Rico, this program is referred to as the Programa de Asistencia Nutricional, or Nutrition Assistance Program (NAP); NAP is administered by the Administración de Desarrollo Socioeconómico de la Familia (ADSEF, Administration for the Socioeconomic Development of the Family).

This study addresses two objectives:

- Provide a detailed update on the administrative, operational, and program integrity changes required to convert NAP to SNAP.
- Develop a detailed implementation plan with specific steps, timelines, and cost estimates for reestablishing SNAP in Puerto Rico.

This implementation plan fulfills the second objective by describing in detail the steps Puerto Rico and FNS must take to design and implement SNAP in Puerto Rico, the timeline for implementing each step, and the estimated cost of implementing and maintaining SNAP. This plan assumes SNAP design and planning would occur while NAP is still in operation and does not address any interim changes to NAP that may be considered by Congress, FNS, or ADSEF. The first objective is addressed in a separate report, *Update to Feasibility Study of Implementing SNAP in Puerto Rico: Final Report* (Thorn et al., 2022).

A. Methods

The study team drew on three primary types of data to inform the development of the implementation timeline: (1) an environmental scan and document review; (2) interviews with FNS staff from the National Office and the Mid-Atlantic Regional Office; and (3) interviews with ADSEF staff and other stakeholders in Puerto Rico, including authorized NAP retailers, the Financial Oversight and Management Board, community-based organizations, employers, partner government agencies, and emergency management partners. The study team used the data to understand the differences between NAP and SNAP, identify the steps ADSEF and FNS would need to take to implement SNAP, and estimate the length of time each step would take.

To estimate the costs of SNAP implementation in Puerto Rico, the study team considered costs for ADSEF labor, FNS labor, consultants, data systems development, and other direct costs. Labor costs were based on the labor categories required; time needed per person; and inflation-adjusted annual salary, fringe benefits, and overhead from fiscal year 2021. The study team estimated the costs of developing a SNAP eligibility system based on recent eligibility system builds in other State agencies and conversations with subject matter experts at FNS. The study team assumed the costs of developing data systems other than the eligibility system would be equal to 25 percent of the eligibility system costs. Other direct costs incurred during implementation include travel, a communications campaign to inform the public and retailers about the transition to SNAP, and translation of program materials.

To estimate ADSEF's administrative costs for ongoing SNAP operations, the study team began by estimating the number of individuals and households that would participate in SNAP in Puerto Rico. The team calculated this estimate using 2019 Puerto Rico Community Survey (PRCS) data in a microsimulation model that applied SNAP eligibility requirement parameters to the microdata and then applied assumptions about likely participation rates. To estimate State agency-level administrative costs, the study team used annual SNAP administration costs across 10 administrative functions from a set of State agencies with caseload sizes, service delivery models, and policy options similar to what is expected in Puerto Rico. The study team estimated ongoing labor costs FNS would incur using the same approach as the FNS SNAP implementation labor costs (i.e., labor categories required; time needed per person; and inflation-adjusted annual salary, fringe benefits, and overhead). The study team included the anticipated cost of the FNS retailer inspections and investigations contract to calculate the total annual FNS operating cost for SNAP in Puerto Rico.

FNS combined anticipated SNAP participation in Puerto Rico with average SNAP household benefits in the 48 States and the U.S. Virgin Islands to estimate SNAP benefit costs in Puerto Rico.

B. Findings: Timeline

This plan offers an estimated implementation timeline based on input from FNS and ADSEF; the experiences of SNAP State agencies; and the study team's understanding of processes within the Federal Government, the Government of Puerto Rico, and ADSEF. Given the unprecedented scale of this project, it is impossible to predict exactly how long each step would take. Certain implementation phases could occur more quickly if processes and timing of different aspects of implementation aligned. Alternatively, phases could take longer if, for example, data systems procurement or testing took longer than anticipated or in the event of a natural disaster. The timeline and cost estimates presented in this document are based on stakeholders' experiences and subject matter expertise related to implementing projects of substantial size and scope. However, the actual timeline and costs for transitioning to SNAP may differ, and Puerto Rico should not be expected or mandated to meet these timeline or cost estimates.

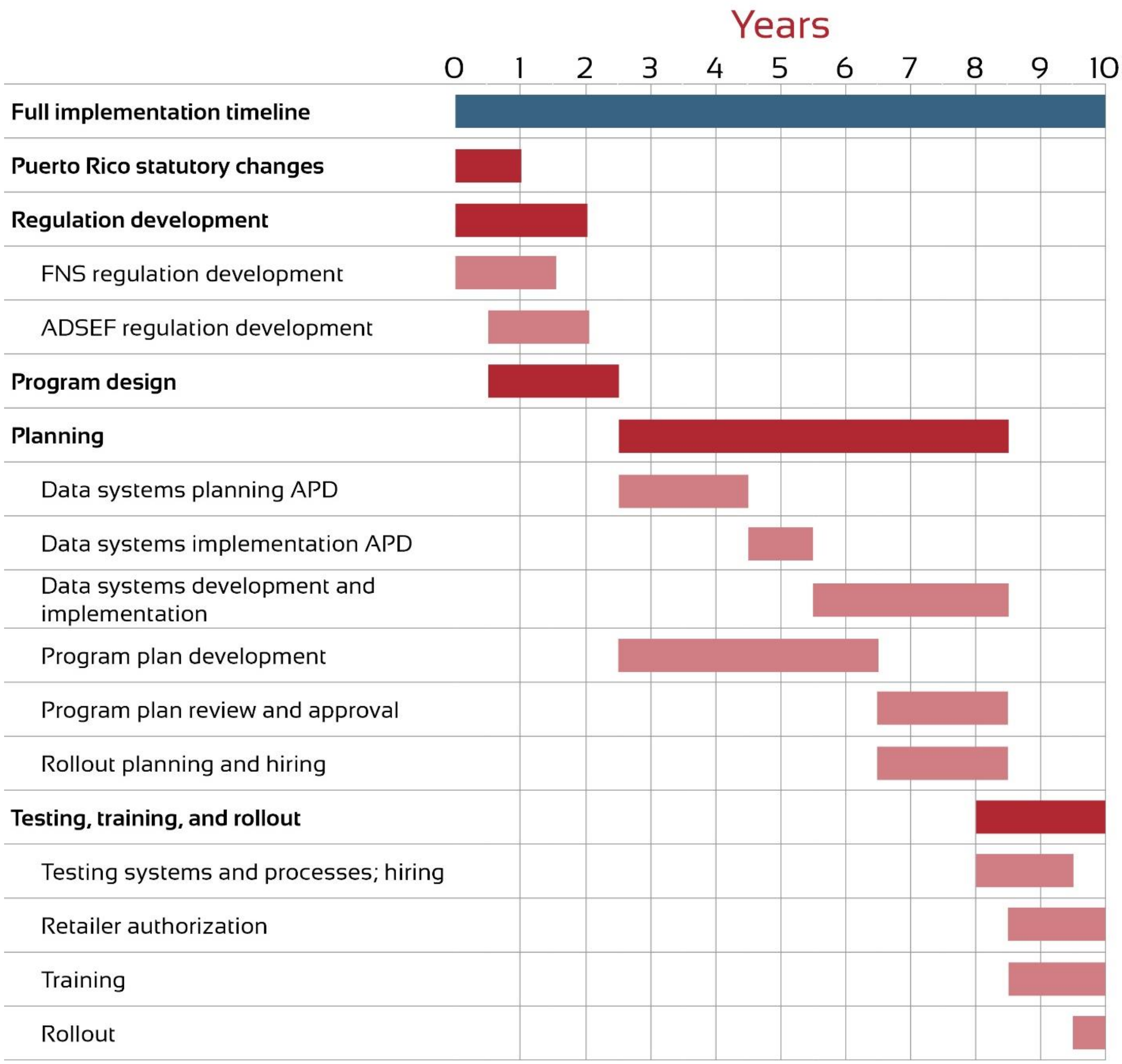
Implementing SNAP in Puerto Rico would require a substantial investment of human resources. To manage the work, ADSEF would form a SNAP implementation steering committee; additional ADSEF staff and consultants would need to contribute at key points in the process. Similarly, FNS would form a SNAP implementation task force to provide coordinated support to ADSEF throughout implementation.

The implementation timeline would have five main phases: (1) Puerto Rico statutory changes; (2) regulation development; (3) program design; (4) planning; and (5) testing, training, and rollout. Some of these phases would occur simultaneously (see figure ES.1). The overall implementation timeline, estimated to take 10 years, would be driven largely by the time needed to develop data systems.

Each phase would consist of a set of activities:

- **Puerto Rico statutory changes.** During this phase, Puerto Rico's legislature would consider statutory provisions for the operation of SNAP in Puerto Rico and appropriate funding for its administration. This phase is estimated to take 6–12 months.
- **Regulation development.** Concurrently, FNS would engage in the rulemaking process to incorporate Puerto Rico in SNAP regulations; this would take 18 months. FNS would also update guidance documents during this phase, as necessary. ADSEF would produce regulations for SNAP. Because ADSEF would need Federal regulations to be finalized before finalizing its own, the study team estimates Puerto Rico would finalize its regulations 6 months after FNS finalized its rulemaking process. In total, this phase is estimated to take 2 years.

Figure ES.1. Implementation Timeline



Note: APD = advance planning document

- **Program design.** Once ADSEF convened the SNAP implementation steering committee, ADSEF would begin the program design process. During this phase, ADSEF's SNAP implementation steering committee would lead the work of making the major decisions about how SNAP would be implemented in Puerto Rico. The steering committee would review SNAP materials and participate in State exchanges to gather key information about SNAP administration. ADSEF would make program design decisions about the service delivery model, policy options and waivers, strategies for responding to natural disasters under SNAP, and strategies for implementing SNAP Employment and Training (E&T) and the SNAP Nutrition Education and Obesity Prevention Services grant program (SNAP-Ed). ADSEF would also learn about the Advance Planning Document (APD) process for data systems development, create a preliminary set of data systems business requirements, and begin the APD process.[1] Throughout this phase, FNS would provide technical assistance. This phase is estimated to take 2 years. This phase could happen more quickly if ADSEF began the process of program design prior to congressional authorization of SNAP.

- **Planning.** The duration of the planning phase would be driven largely by the planning and development of SNAP data systems, which cannot begin before ADSEF completes the program design work. ADSEF would complete the Planning Advance Planning Document (PAPD) process and begin the Implementation Advance Planning Document (IAPD) process for data systems development. ADSEF would procure a contractor and oversee the contractor's work in developing and conducting initial tests of the data systems, which would be ready for testing by the end of the planning phase.[2] State agencies can take from 4 to over 10 years to complete the steps in the APD process. No recent SNAP State agency data systems projects compare with the scale of the data systems work that would be required to implement SNAP in Puerto Rico, so data systems could require more time for Puerto Rico. For the purpose of this timeline, the planning stage was estimated to take 6 years. During this time, ADSEF would also develop the component materials of the State Plan of Operations and a range of participant-facing materials based on the decisions made during the program design phase. FNS would provide technical assistance throughout the phase. FNS would also begin planning to assume responsibility for retailer authorization and management and prepare for SNAP benefit issuance in Puerto Rico. ADSEF and FNS would also develop plans for the hiring, testing, training, and rollout that would begin in the next phase.
- **Testing, training, and rollout.** During the final phase of the implementation process, ADSEF would hire and train staff, conduct a communications campaign for NAP participants and other potential SNAP participants about the program change, and complete final testing of data systems and program operations and processes. This implementation plan assumes a staggered rollout of SNAP, which would begin during this phase.[3] FNS would continue to provide technical assistance, hire and train new Federal staff, authorize retailers, and make final preparations for SNAP benefit issuance in Puerto Rico. At the conclusion of this 24-month phase, SNAP would be in operation across Puerto Rico.

C. Findings: Costs

Estimated SNAP participation based on 2019 PRCS data is higher than actual 2019 NAP participation (table ES.1). The study team produced these estimates under two sets of assumptions: Federal rules for eligibility determination and broad-based categorical eligibility (BBCE) rules.

Table ES.1. Estimated SNAP Participation and Actual NAP Participation, 2019

Measure	NAP	SNAP	Difference
	Federal Rules		
Participating household units	723,435	838,418	+15.9%

[1] Necessary SNAP data system functions include eligibility determination, case management, data verification, financial management and accounting, electronic benefit transfer issuance and tracking, and Disaster SNAP eligibility determination. Other data system functions that could be incorporated either in the initial development process or during a later expansion include document imaging, SNAP E&T participation and outcomes tracking, online application, online accounts management, and call center software.

[2] The FNS Handbook 901 includes timelines and planning materials States can use to understand and plan for APD and implementation processes (USDA FNS, 2020).

[3] Although a staggered rollout would facilitate the live pilot testing FNS requires for data systems implementation and would ameliorate logistical challenges associated with enrolling more than 860,000 households in SNAP, it could lead to disparate impacts on the population of Puerto Rico. ADSEF and FNS may need to develop strategies to minimize disparate impacts.

Measure	NAP	SNAP	Difference
Participating individuals	1,330,902	1,449,360	+8.9%
Coverage of Puerto Rico population	41.7%	45.4%	+3.7 percentage points
BBCE Rules			
Participating household units	723,435	860,866	+19.0%
Participating individuals	1,330,902	1,488,620	+11.9%
Coverage of Puerto Rico population	41.7%	46.6%	+4.9 percentage points

Note: The 2019 PRCS-based microsimulation model provides estimates of the number of household units that would be eligible for SNAP in an average month during 2019.
ADSEF = Administración de Desarrollo Socioeconómico de la Familia (Administration for the Socioeconomic Development of the Family); BBCE = broad-based categorical eligibility; PRCS = Puerto Rico Community Survey
Sources: NAP participation: Administrative data for 2019 provided by ADSEF; SNAP participation: 2019 PRCS-based microsimulation model using Federal SNAP rules or BBCE rules and assumed participation rates

The study team estimated costs for SNAP implementation over the course of the 10-year implementation period to be a total of $384 million (table ES.2). This estimate includes $322 million for developing data systems (84 percent of the total implementation costs). These costs are underestimates if the implementation period were to extend past 10 years or if salaries increase more than anticipated. Because there is no recent precedent for a State agency implementing SNAP, the study team has not made assumptions about how implementation costs would be shared between Puerto Rico and the Federal Government.

Table ES.2. Estimated Costs for SNAP Implementation, 10-Year Implementation Period

Cost Category	Estimated Costs ($)		
	Low	Midpoint	High
ADSEF labor	13,367,571	15,726,554	18,085,538
ADSEF consultants	7,055,843	8,300,991	9,546,140
FNS labor	18,419,417	21,669,903	24,920,388
Data systems costs	289,019,586	322,057,428	355,095,270
Other direct costs	13,526,485	15,913,511	18,300,538
Total	341,388,902	383,668,388	425,947,874

Note: ADSEF = Administración de Desarrollo Socioeconómico de la Familia (Administration for the Socioeconomic Development of the Family)

The study team estimated the ongoing costs of operating SNAP to be $4.7–$4.9 billion per year (table ES.3). This estimate includes $4.5 billion per year for benefits to SNAP participants, which would be funded by the Federal Government. Costs for program administration at the State level would be split between the Federal Government and Puerto Rico; for the most part, the costs would be split evenly, but the Federal Government would cover 100 percent of the costs for SNAP-Ed and some SNAP E&T expenses.[4] Administrative costs for FNS would be borne entirely by the Federal Government.

[4] For all SNAP cost categories, cost estimates reflect the costs of a mature program. Costs in Puerto Rico for some categories, such as SNAP-Ed and SNAP E&T, may be low in initial years, while costs for other categories, such as certification, may be high in initial years compared with a mature program. For the purposes of these cost estimates, the study team assumed Puerto Rico would receive the minimum SNAP E&T grant of $100,000.

Table ES.3. Estimated Annual Costs for Ongoing SNAP Administration and Benefits (in 2031 Dollars)

Cost Category	Puerto Rico	Federal Government	Total
Assuming No Increase in FY 2021 Puerto Rico Salaries Except Inflation			
Administrative costs for Puerto Rico	114,566,606	128,647,457	243,214,063
Administrative costs for FNS	0	5,837,356	5,837,356
Subtotal SNAP administrative costs	114,566,606	134,484,812	249,051,418
Benefit costs	0	4,500,000,000	4,500,000,000
Total SNAP Administration and Benefits Annual Costs	**114,566,606**	**4,634,484,812**	**4,749,051,418**
Assuming 75 Percent Increase in Puerto Rico Salaries			
Administrative costs for Puerto Rico	192,143,342	215,661,267	407,804,609
Administrative costs for FNS	0	5,837,356	5,837,356
Subtotal SNAP administrative costs	192,143,342	221,498,623	413,641,965
Benefit costs	0	4,500,000,000	4,500,000,000
Total SNAP Administration and Benefits Annual Costs	**192,143,342**	**4,721,498,623**	**4,913,641,965**

Total costs for administering SNAP in Puerto Rico would be substantially greater than those for NAP (table ES.4). Had Puerto Rico administered SNAP in FY 2021, the estimated cost to the Federal Government for program administration and benefits ($3.8 billion) would have been nearly double the cost of NAP ($2.0 billion). Puerto Rico's estimated portion of SNAP administrative costs in FY 2021 would have been 2.4 times greater than its costs for NAP.[5]

Table ES.4. Comparison of Administrative and Benefit Costs for NAP and SNAP in Puerto Rico

Funding Entity	Total Annual Costs of Program Administration and Benefits
Budgeted NAP Costs (FY 2021)	
Puerto Rico	40,059,544
Federal Government	2,038,051,500
Total	**2,078,111,044**
Estimated SNAP Costs (2021 Dollars)	
Puerto Rico	94,673,253
Federal Government	3,829,283,802
Total	**3,923,957,055**
Estimated SNAP Costs (2031 Dollars)	
Puerto Rico	114,566,606
Federal Government	4,628,647,457
Total	**4,743,214,063**

Note. Administrative costs for the FNS National Office and MARO are not included in this table. The Federal Government rows of this table represent the Federal share of the administrative costs incurred in Puerto Rico.

This implementation plan is also available in Spanish. See *Actualización del Estudio de Viabilidad para la Implementación del SNAP en Puerto Rico: Plan de Implementación* by Thorn et al., 2022.

[5] This estimate assumes FY 2021 salary levels for ADSEF and FNS staff, adjusted for inflation.

Resumen Ejecutivo

Este plan de implementación presenta los resultados de un estudio del Servicio de Alimentos y Nutrición (FNS, por sus siglas en inglés) del Departamento de Agricultura de los Estados Unidos (USDA) para evaluar los cambios y costos necesarios para operar el Programa de Asistencia Nutricional Suplementaria (SNAP, por sus siglas en inglés) en Puerto Rico y desarrollar un plan de implementación detallado. FNS administra el SNAP en los 50 estados, el Distrito de Columbia y 2 de los 5 territorios de los Estados Unidos (EE. UU.)—Guam y las Islas Vírgenes. Puerto Rico, el Estado Libre Asociado de las Islas Marianas del Norte y Samoa Americana reciben fondos fijos o “fixed block grants” para operar un programa de asistencia nutricional. En Puerto Rico, este programa se conoce como el Programa de Asistencia Nutricional (PAN); el PAN es administrado por la Administración de Desarrollo Socioeconómico de la Familia (ADSEF).

Este estudio tiene dos objetivos:

- Proporcionar una actualización detallada sobre los cambios administrativos, operativos y de integridad programática que son requeridos para convertir el PAN al SNAP.
- Desarrollar un plan de implementación detallado con pasos específicos, cronogramas y estimaciones de costos para restablecer el SNAP en Puerto Rico.

Este plan de implementación cumple con el segundo objetivo al describir en detalle los pasos que Puerto Rico y FNS deben tomar para diseñar e implementar el SNAP en Puerto Rico, el cronograma para implementar cada paso, y estimaciones de costos para implementar y mantener el SNAP. Este plan asume que el diseño y la planificación del SNAP se llevarán a cabo mientras el PAN todavía esté en funcionamiento y no aborda ningún cambio interino al PAN que pueda ser considerado por el Congreso, FNS o ADSEF. El primer objetivo se aborda en un informe separado, *Actualización del Estudio de Viabilidad para la Implementación del SNAP en Puerto Rico: Informe Final* (Thorn et al., 2022).

A. Métodos

El equipo encargado del estudio se basó en tres tipos principales de datos para informar el desarrollo del cronograma de implementación: (1) un análisis del entorno y revisión de documentos, (2) entrevistas con el personal de la Oficina Nacional y la Oficina Regional del Atlántico Medio de FNS y (3) entrevistas con el personal de ADSEF y otros grupos de interés en Puerto Rico, incluyendo a los comerciantes autorizados para debitar fondos del PAN, a la Junta de Supervisión y Administración Financiera para Puerto Rico, a las organizaciones comunitarias, a los empleadores, a las agencias gubernamentales asociadas y a los socios de manejo de emergencias. El equipo encargado del estudio utilizó estos datos para entender las diferencias entre el PAN y el SNAP, para identificar los pasos que ADSEF y FNS necesitarían tomar para implementar el SNAP y para estimar el tiempo que cada paso tomaría.

Para estimar los costos de la implementación del SNAP en Puerto Rico, el equipo encargado del estudio consideró los costos laborales de ADSEF, de FNS, de los consultores, del desarrollo de los sistemas de datos y otros costos directos. Los costos laborales fueron basados en las categorías laborales requeridas; tiempo necesitado por persona; y salario anual, beneficios marginales y gastos generales ajustados por inflación del año fiscal (AF) 2021. El equipo encargado del estudio estimó los costos del desarrollo de un sistema de elegibilidad del SNAP basado en los desarrollos recientes de sistemas de elegibilidad de otras agencias estatales y en conversaciones con especialistas en el tema en FNS. El equipo encargado del estudio asumió que los costos del desarrollo de otros sistemas de datos distintos del sistema de elegibilidad serían igual al 25 por ciento de los costos del sistema de elegibilidad. Otros costos directos incurridos durante la implementación incluyen viajes, una campaña para informar al público y a los comerciantes sobre la transición al SNAP y la traducción de materiales del programa.

Para estimar los costos administrativos de ADSEF para los operativos continuos del SNAP, el equipo encargado del estudio comenzó estimando los números de los individuos y hogares que participarían del SNAP en Puerto Rico. El equipo logró esto utilizando datos de la Encuesta sobre la Comunidad de Puerto Rico (Puerto Rico Community Survey, PRCS) del 2019 en un modelo de microsimulación que aplicó parámetros de requisitos de elegibilidad del SNAP a los microdatos y luego aplicó suposiciones sobre las posibles tazas de participación. Para estimar los costos administrativos a nivel de la agencia estatal, el equipo encargado del estudio utilizó los costos anuales de la administración del SNAP a través de 10 funciones administrativas de un conjunto de estados con un tamaño de carga de casos, modelo de distribución de servicios y opciones de políticas similar a lo que se espera en Puerto Rico. El equipo encargado del estudio estimó los costos laborales continuos que serían incurridos por FNS utilizando el mismo método que el de los costos laborales de FNS para la implementación del SNAP (es decir, categorías laborales requeridas; tiempo necesitado por persona; y salario anual, beneficios marginales y gastos generales ajustados por inflación). El equipo encargado del estudio incluyó los costos anticipados del contrato de FNS para las inspecciones e investigaciones de comercios para calcular el total anual de los costos operativos de FNS para el SNAP en Puerto Rico.

FNS utilizó la participación anticipada del SNAP en Puerto Rico y el promedio de beneficios del SNAP por hogar en los 48 estados y las Islas Vírgenes para estimar costos de beneficios del SNAP en Puerto Rico.

B. Hallazgos: Cronograma

Este plan ofrece un cronograma estimado de la implementación basado en la aportación de FNS y ADSEF; las experiencias de agencias estatales del SNAP; y la comprensión del equipo encargado del estudio en cuanto a los procesos dentro del gobierno federal, el gobierno de Puerto Rico y ADSEF. Dada la escala sin precedentes de este proyecto, es imposible predecir exactamente cuánto tiempo tomaría cada paso. Ciertas fases de la implementación podrían ocurrir más rápidamente si se alinearan los procesos y el tiempo de diferentes aspectos de la implementación. Por otro lado, las fases podrían demorarse si, por ejemplo, la adquisición o prueba de los sistemas de datos se tardan más de lo anticipado o en el evento de un desastre natural. El cronograma y las estimaciones de costos presentados en este documento están basados en la experiencia de los grupos de interés y dominio del tema de expertos en la materia relacionado a la implementación de proyectos de tamaño y magnitud sustancial. Sin embargo, el cronograma y los costos actuales para la transición al SNAP pueden diferir y Puerto Rico no debería ser esperado o mandado a cumplir con este cronograma o estimaciones de costos.

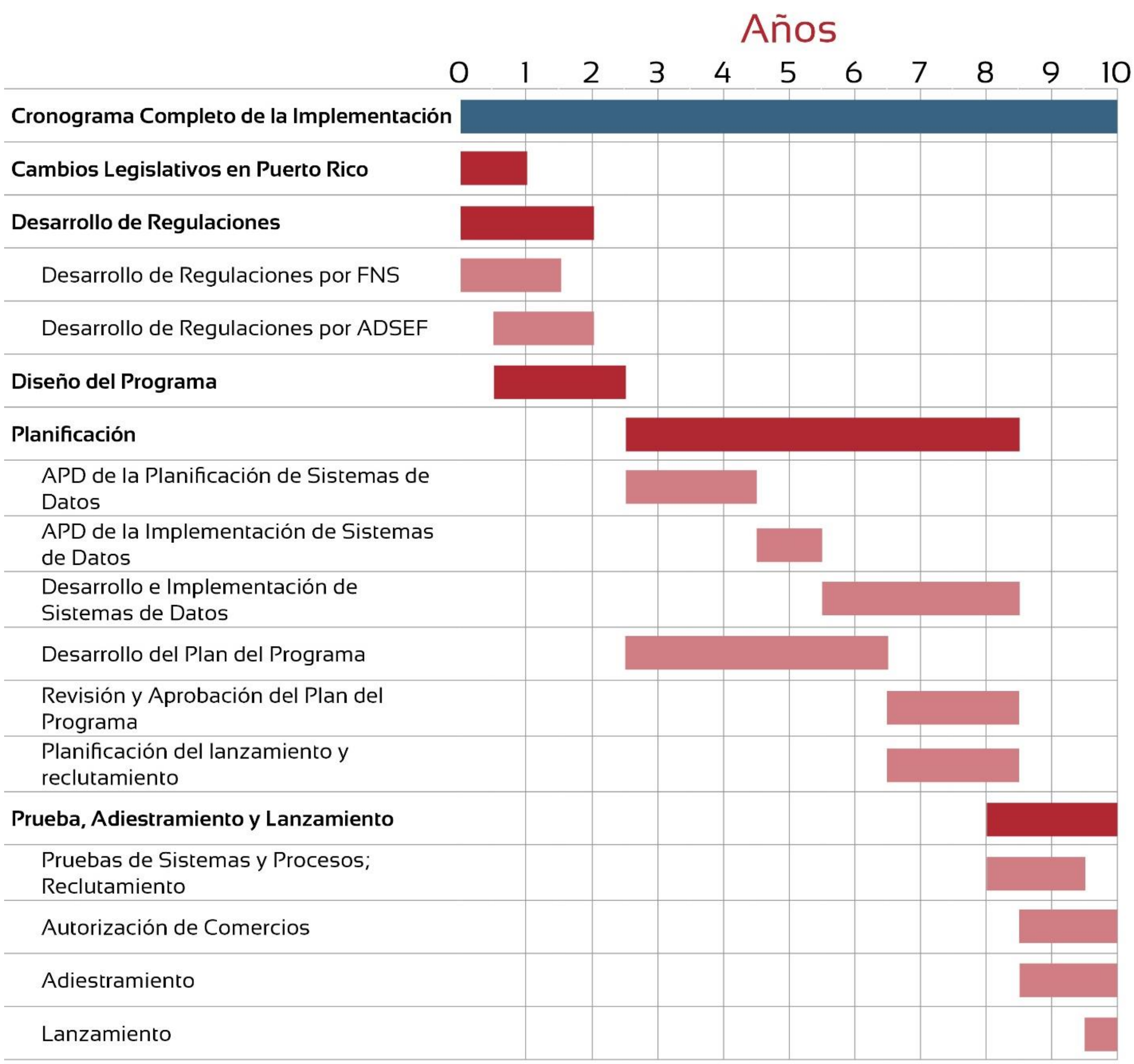
La implementación del SNAP en Puerto Rico requeriría una inversión sustancial de recursos humanos. Para gestionar el trabajo, ADSEF formaría un comité directivo para la implementación del SNAP; personal y consultores adicionales de ADSEF tendrían que contribuir en puntos clave del proceso. De manera similar, FNS formaría un grupo de trabajo para la implementación del SNAP para brindar apoyo coordinado a ADSEF durante la implementación.

El cronograma de implementación tendría cinco fases principales: (1) cambios legislativos en Puerto Rico, (2) desarrollo de regulaciones, (3) diseño del programa, (4) planificación, y (5) prueba, adiestramiento y lanzamiento. Algunas de estas fases ocurrirían simultáneamente (vea gráfica ES.1). El cronograma de implementación total, que se estima que tomaría 10 años, dependería en gran medida del tiempo necesario para desarrollar los sistemas de datos.

Cada fase consistiría en un conjunto de actividades claves:

- **Cambios legislativos en Puerto Rico.** Durante esta fase, la legislatura de Puerto Rico consideraría las provisiones legislativas para los operativos del SNAP en Puerto Rico y delegaría los fondos para su administración. Se estima que esta fase tomaría 6–12 meses.
- **Desarrollo de regulaciones.** Al mismo tiempo, FNS participaría en el proceso de reglamentación para incorporar a Puerto Rico a las regulaciones del SNAP; esto tomaría 18 meses. FNS también actualizaría los documentos guías durante esta fase, según sea necesario. ADSEF produciría regulaciones para el SNAP. Dado que ADSEF necesitaría que las regulaciones federales sean finalizadas antes de finalizar las suyas, el equipo encargado del estudio estima que Puerto Rico finalizara sus regulaciones 6 meses luego de que FNS finalice su proceso de reglamentación. En total, se estima que esta fase tomaría 2 años.

Gráfica ES.1. Cronograma de Implementación



Nota: APD = documento de planificación avanzada

- **Diseño del programa.** Una vez que ADSEF convoque al comité directivo de implementación del SNAP, ADSEF comenzaría el proceso de diseño del programa. Durante esta fase, el comité directivo de la implementación del SNAP de ADSEF lideraría el trabajo de tomar las decisiones más importantes sobre cómo el SNAP sería implementado en Puerto Rico. El comité directivo revisaría materiales del SNAP y participaría en intercambios estatales para recolectar información importante sobre la administración del SNAP. ADSEF tomaría decisiones de diseño del programa sobre el modelo de proporcionar servicios, opciones y exenciones de políticas, estrategias para responder a desastres naturales bajo el SNAP y estrategias para la implementación de los programas de Empleo y Capacitación del SNAP (SNAP E&T) y de financiamiento del SNAP para la Educación Nutricional y la Prevención de la Obesidad (SNAP-Ed). ADSEF también aprendería sobre el proceso del Documento de Planificación Avanzada (Advance Planning Document, APD) para el desarrollo de sistemas de datos, crearía un conjunto preliminar de las necesidades empresariales de los sistemas de datos y comenzaría el proceso APD.[6] A través de esta fase, FNS proporcionaría asistencia técnica. Se estima que esta fase tomaría 2 años. Esta fase podría ser más rápida si ADSEF iniciara el proceso del diseño del programa antes de la autorización del SNAP por parte del Congreso.
- **Planificación.** La duración de la fase de planificación dependería en gran medida de la planificación y el desarrollo de los sistemas de datos del SNAP, los cuales no pueden comenzar antes de que ADSEF complete el trabajo del diseño del programa. ADSEF completaría el proceso del Documento de Planificación Previa de Planificación (Planning Advance Planning Document, PAPD) y comenzaría el proceso del Documento de Planificación Previa de Implementación (Implementation Advance Planning Document, IAPD) para el desarrollo de los sistemas de datos. ADSEF reclutaría un contratista y supervisaría el trabajo del contratista en el desarrollo y pruebas iniciales de los sistemas de datos, los cuales deberían estar listos para prueba al final de la fase de planificación.[7] Las agencias estatales pueden tardar de 4 a más de 10 años en completar los pasos del proceso APD. Ningún proyecto reciente de sistemas de datos de agencias estatales del SNAP se compara con la escala del trabajo de sistemas de datos que se requeriría para implementar el SNAP en Puerto Rico, por lo que los sistemas de datos podrían requerir más tiempo para Puerto Rico. Para el propósito de este cronograma, se estimó que la etapa de planificación tomaría 6 años. Durante este tiempo, ADSEF también desarrollaría los materiales componentes del Plan Estatal de Operaciones y una variedad de materiales para participantes basado en las decisiones tomadas durante la fase de diseño del programa. FNS proporcionaría asistencia técnica a través de esta fase. También, FNS comenzaría a planificar como asumir responsabilidad para la autorización y el manejo de comercios y a prepararse para la emisión de beneficios de SNAP en Puerto Rico. También, ADSEF y FNS desarrollarían planes para el reclutamiento, las pruebas, el adiestramiento y el lanzamiento que comenzaría en la próxima fase.
- **Prueba, adiestramiento y lanzamiento.** Durante la fase final del proceso de implementación, ADSEF reclutaría y adiestraría personal y llevaría a cabo una campaña para informar a los participantes del PAN y otros posibles participantes del SNAP sobre el cambio del programa.

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[6] Funciones necesarias de los sistemas de datos del SNAP incluyen determinación de elegibilidad, manejo de casos, verificación de datos, administración financiera y contabilidad, emisión y monitoreo de la transferencia electrónica de beneficios, revisión de control de calidad estatal y determinación de elegibilidad para el SNAP para desastres. Otras funciones del sistema de datos que podrían ser incorporados durante el proceso de desarrollo inicial o luego durante una expansión incluyen imágenes de datos, participación y monitoreo de resultados del SNAP E&T, aplicaciones en línea, manejo de casos en línea y programa (“software”) del centro de llamadas.

[7] El Manual FNS 901 incluye cronogramas y materiales de planificación que los estados pueden utilizar para comprender y planificar los procesos de APD e implementación. Siguiendo el diseño del programa y la planificación, el Manual estima que los pasos del PAPD y del IAPD toman aproximadamente de 3 a 4 años. Las actividades de implementación pueden variar en duración de 3 a más de 5 años. (U.S. Department of Agriculture. (2020). FNS Handbook 901: The Advanced Planning Document Process. A State Systems Guide to America’s Food Programs. Version 2.4, pg. 119 – 120. https://fns-prod.azureedge.net/sites/default/files/resource-files/HB901v2.4.pdf)

También, ADSEF completaría pruebas finales de los sistemas de datos, operaciones y procesos del programa. Este plan de implementación asume un lanzamiento del SNAP escalonado, el cual comenzaría durante esta fase[8]. FNS continuaría proporcionando asistencia técnica, contratando y adiestrando personal federal, autorizando comercios y llevando a cabo los preparativos finales para la emisión de beneficios del SNAP en Puerto Rico. Al final de esta fase de 24 meses, el SNAP estaría operando a través de Puerto Rico.

C. Hallazgos: Costos

La participación estimada del SNAP basado en datos del PRCS del 2019 es mayor que la participación actual del PAN en el 2019 (tabla ES.1). El equipo encargado del estudio produjo estos estimados bajo dos suposiciones: normas federales para la determinación de elegibilidad y la norma de elegibilidad categórica de base amplia (BBCE).

Tabla ES.1. Estimados de la Participación del SNAP y Participación Actual del PAN, 2019

Medidas	PAN	SNAP	Diferencia
Normas Federales			
Unidades familiares participantes	723,435	838,418	+15.9%
Individuos participantes	1,330,902	1,449,360	+8.9%
Cobertura de la población de Puerto Rico	41.7%	45.4%	+3.7 puntos
Normas BBCE			
Unidades familiares participantes	723,435	860,866	+19.0%
Individuos participantes	1,330,902	1,488,620	+11.9%
Cobertura de la población de Puerto Rico	41.7%	46.6%	+4.9 puntos

Nota: El modelo de microsimulación basado en la PRCS de 2019 proporciona estimados del número de unidades familiares que serían elegibles para el SNAP en un mes promedio durante el 2019.
ADSEF = Administración de Desarrollo Socioeconómico de la Familia; BBCE = norma de elegibilidad categórica de base amplia; PRCS = Encuesta sobre la Comunidad de Puerto Rico (Puerto Rico Community Survey)
Fuentes: Participación del PAN: Datos administrativos del 2019 facilitados por ADSEF; Participación del SNAP: modelo de microsimulación basado en la PRCS de 2019 utilizando normas federales del SNAP o las normas BBCE y las tasas de participación asumidas

El equipo encargado del estudio estimó que los costos para la implementación del SNAP en el transcurso del periodo de implementación de 10 años sería un total de $384 millones (tabla ES.2). Este estimado incluye $322 millones para el desarrollo de los sistemas de datos (84 por ciento del total de los costos de implementación). Estos costos son subestimados si el periodo de implementación se extiende más allá de los 10 años o si los salarios aumentan más de lo anticipado. Como no existe un precedente reciente de un estado que haya implementado el SNAP, el equipo encargado del estudio no ha hecho ninguna suposición sobre cómo los costos de implementación serían compartidos entre Puerto Rico y el gobierno federal.

[8] A pesar de que un lanzamiento escalonado permitiría la prueba piloto en vivo que FNS requiere para la implementación de sistemas de datos y mejoraría las dificultades logísticas asociadas con inscribir a más de 860,000 hogares en el SNAP, podría dar lugar a impactos dispares en la población de Puerto Rico. ADSEF y FNS podrían necesitar desarrollar estrategias para minimizar impactos dispares.

Tabla ES.2. Estimados de Costos para la Implementación del SNAP, Periodo de Implementación de 10 años

Categoría de Costo	Costos Estimados ($)		
	Bajo	Punto Medio	Alto
Labor de ADSEF	13,367,571	15,726,554	18,085,538
Consultores de ADSEF	7,055,843	8,300,991	9,546,140
Labor de FNS	18,419,417	21,669,903	24,920,388
Costos de sistemas de datos	289,019,586	322,057,428	355,095,270
Otros costos directos	13,526,485	15,913,511	18,300,538
Total	341,388,902	383,668,388	425,947,874

Nota: ADSEF = Administración de Desarrollo Socioeconómico de la Familia

El equipo encargado del estudio estimó que los costos continuos de los operativos del SNAP serían de $4.7–$4.9 billones por año (tabla ES.3). Este estimado incluye $4.5 billones por año para beneficios de los participantes del SNAP, los cuales serían financiados por el gobierno federal. Los costos administrativos del programa a nivel estatal serían divididos entre el gobierno federal y Puerto Rico; por lo general se dividirían uniformemente, pero el gobierno federal cubriría 100 por ciento de los costos para el SNAP-Ed y parte de los gastos del SNAP E&T.[9] Los costos administrativos de FNS serían pagados en su totalidad por el gobierno federal.

Tabla ES.3. Costos Anuales Estimados para la Administración Continua y Beneficios del SNAP (dólares del 2031)

Categoría de Costo	Puerto Rico	Gobierno Federal	Total
Asumiendo Ningún Aumento en los Salarios de Puerto Rico en el AF 2021 Excepto por Inflación			
Costos administrativos para Puerto Rico	114,566,606	128,647,457	243,214,063
Costos administrativos para FNS	0	5,837,356	5,837,356
Subtotal de costos administrativos del SNAP	114,566,606	134,484,812	249,051,418
Costos de beneficios	0	4,500,000,000	4,500,000,000
Total de Costos Anuales de la Administración y los Beneficios del SNAP	**114,566,606**	**4,634,484,812**	**4,749,051,418**
Asumiendo un Aumento de 75 Por Ciento en los Salarios de Puerto Rico			
Costos administrativos para Puerto Rico	192,143,342	215,661,267	407,804,609
Costos administrativos para FNS	0	5,837,356	5,837,356
Subtotal de costos administrativos del SNAP	192,143,342	221,498,623	413,641,965
Costos de beneficios	0	4,500,000,000	4,500,000,000
Total de Costos Anuales de la Administración y los Beneficios del SNAP	**192,143,342**	**4,721,498,623**	**4,913,641,965**

Nota: ADP = procesamiento automatizado de datos

El total de los costos para la administración del SNAP en Puerto Rico sería sustancialmente mayor que los del PAN (tabla ES.4). Si Puerto Rico hubiera administrado el SNAP en el AF 2021, el costo estimado del gobierno federal para la administración y los beneficios ($3.8 billones) hubieran sido casi el doble de

[9] Para todas las categorías de costos del SNAP, los estimados de costos reflejan los costos de un programa maduro. Los costos para algunas categorías en Puerto Rico, como el SNAP-Ed y el SNAP E&T, podrían ser bajos en los años iniciales mientras que los costos para otras categorías, como certificación, podrían ser altos durante los años iniciales en comparación con un programa del SNAP maduro. Para el propósito de estos estimados de costos, el equipo encargado del estudio asumió que Puerto Rico recibiría los fondos mínimos del SNAP E&T de $100,000.

los costos del PAN ($2.0 billones). La porción estimada de los costos administrativos del SNAP de Puerto Rico en el AF 2021 hubieran sido 2.4 veces mayor que sus costos para el PAN.[10]

Tabla ES.4. Comparación de Costos Administrativos y de Beneficios para el PAN y el SNAP en Puerto Rico

Entidad de Fondos	Total de Costos Administrativos y de Beneficios Anuales
Costos del PAN Presupuestados (AF 2021)	
Puerto Rico	40,059,544
Gobierno Federal	2,038,051,500
Total	**2,078,111,044**
Costos Estimados del SNAP (dólares del 2021)	
Puerto Rico	94,673,253
Gobierno Federal	3,829,283,802
Total	**3,923,957,055**
Costos Estimados del SNAP (dólares del 2031)	
Puerto Rico	114,566,606
Gobierno Federal	4,628,647,457
Total	**4,743,214,063**

Nota. Los costos administrativos de la Oficina Nacional de FNS y MARO no están incluidos en esta tabla. Las filas del gobierno federal de esta tabla representan la parte federal de los costos administrativos incurridos en Puerto Rico.

Este plan de implementación también está disponible en español. Vea *Actualización del Estudio de Viabilidad para la Implementación del SNAP en Puerto Rico: Plan de Implementación* por Thorn et al., 2022.

[10] Este estimado asume los niveles de salario del AF 2021 para el personal de ADSEF y FNS, ajustados por inflación.

Chapter 1. Introduction

This implementation plan presents results of a U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) study to assess the administrative, operational, and program integrity changes and costs needed to operate the Supplemental Nutrition Assistance Program (SNAP) in Puerto Rico. The nutrition assistance programs administered by FNS provide a food security safety net across the United States and its territories. The mission of FNS is to increase food security and reduce hunger by providing Americans with low incomes access to food, healthful diets, and nutrition education. FNS administers SNAP in all 50 States, the District of Columbia, and 2 of the 5 U.S. territories—Guam and the U.S. Virgin Islands. Puerto Rico, the Commonwealth of the Northern Mariana Islands, and American Samoa each receive a block grant for operating a nutrition assistance program. In Puerto Rico, this program is referred to as the Programa de Asistencia Nutricional (NAP); NAP is administered by the Administración de Desarrollo Socioeconómico de la Familia (ADSEF), or Administration for the Socioeconomic Development of the Family.

The U.S. Congress passed the Further Consolidated Appropriations Act, 2020 (P.L. 116–94) in December 2019. Section 776 of this bill requires an update to the 2010 feasibility study of implementing SNAP in Puerto Rico pursuant to House Report 116-107, which further elaborates that the updated feasibility study will focus on the administrative, operational, and program integrity aspects of the program, and include a detailed plan for USDA and the Commonwealth to implement SNAP. To understand the feasibility of implementing SNAP in Puerto Rico and develop the implementation timeline, the study team conducted analyses across a range of program areas: eligibility determination and benefit issuance, program integrity, retailer management, SNAP Employment and Training (E&T), disaster response, SNAP Nutrition Education and Obesity Prevention Services grant program (SNAP-Ed), other areas of SNAP administration, and data systems.

This study addresses two objectives:

- Provide a detailed update on the administrative, operational, and program integrity changes required to convert NAP to SNAP.
- Develop a detailed implementation plan with specific steps, timelines, and cost estimates for reestablishing SNAP in Puerto Rico.

This implementation plan fulfills the second objective by describing in detail the steps that Puerto Rico and FNS would need to take to design and implement SNAP in Puerto Rico, the timeline for implementing each step, and the estimated costs of implementing and maintaining SNAP. This plan assumes SNAP design and planning would occur while NAP is still in operation and does not address any interim changes to NAP that may be considered by Congress, FNS, or ADSEF.

The first objective is addressed in a separate report, *Update to Feasibility Study of Implementing SNAP in Puerto Rico: Final Report* (Thorn et al., 2022). The report, referred to as the feasibility report throughout this document, describes NAP policy, administration, and operational characteristics across eight domains: certification and benefit issuance, program integrity, retailer authorization and management, work requirements and SNAP E&T, disaster response, SNAP-Ed, program administration, and data systems. The report compares each of these domains with SNAP and identifies similarities and gaps that are important to consider in a transition from NAP to SNAP. The feasibility report also discusses potential interim changes that could be integrated into NAP during SNAP implementation to benefit individuals with low incomes in Puerto Rico and/or facilitate the transition to SNAP.

A. Assumptions

The projected timeline and estimated costs presented in this implementation plan are based on (1) FNS and ADSEF's experiences making substantial program changes and (2) subject matter expertise related to data systems and policy development and implementation. However, because there is no direct precedent for SNAP implementation in the past 40 years, the study team needed to make several assumptions in the development of this implementation plan. These assumptions about potential SNAP operations in Puerto Rico may affect the timeline and costs and should be taken into consideration when making decisions about resource allocation. The actual timeline and costs for implementing a transition may differ.

1. Feasibility

This plan assumes implementing SNAP in Puerto Rico is feasible. The feasibility report discusses the primary challenges to feasibility and the resources available to address those challenges in more detail. The three most significant challenges for Puerto Rico would be staffing, administrative costs, and data systems development. A transition to SNAP would require a large increase in ADSEF's staff because more households would likely participate in SNAP than in NAP (see chapter 7), and SNAP is a more regulated program with many additional requirements. As a result, SNAP would more than double ADSEF's administrative costs compared with NAP (see chapter 8). Administrative costs may increase even more given ongoing challenges with recruiting and retaining employees to operate NAP, which could require increasing salaries. Developing a full range of data systems from scratch to support SNAP would be an unprecedented task; ADSEF has no recent experience with a large data systems project, let alone one of this magnitude. When existing SNAP State agencies update their systems, they are able to rely on legacy systems until the new systems are ready for rollout, which is a support not possible in Puerto Rico. ADSEF would also need to develop these systems having just learned about SNAP; systems development is a substantial challenge even for State agencies with decades of experience and considerable SNAP expertise.

2. SNAP Knowledge Base

Although NAP and SNAP have some similarities, many important differences are apparent between the programs, including SNAP components with no parallel in NAP (e.g., SNAP E&T). These differences are detailed in the feasibility report (Thorn et al., 2022). As of the time of data collection, ADSEF had interest in developing some of these components under NAP and had begun the process of learning about how these components could be incorporated. ADSEF's staff and administration would need to build their SNAP expertise to transition to SNAP. This implementation plan assumes that as of the time of congressional authorization of SNAP in Puerto Rico, ADSEF's knowledge base of the details of SNAP requirements would not be extensive. If ADSEF and FNS invest in ADSEF's SNAP knowledge base prior to authorization, and ADSEF is prepared to make program design decisions, the overall timeline for implementation could be reduced from the estimate presented here.

3. SNAP Policy Options

SNAP regulations offer a range of flexibilities to the State agencies that administer the program. Some program options result in reduced burden on SNAP State agency staff and significantly reduced administrative costs (Geller et al., 2019). Throughout this plan, the study team assumes ADSEF would choose two key options associated with reduced administrative costs:

- **Broad-based categorical eligibility (BBCE) rules** increase the number of households eligible for SNAP by eliminating the asset test and increasing the gross-income limit up to 200 percent of the Federal Poverty Guidelines for households that receive noncash benefits funded by Temporary Assistance for Needy Families (TANF) or Maintenance of Effort Funds. This plan assumes the gross income limit for SNAP participation in Puerto Rico would be set at 200 percent of the Federal Poverty Guidelines used in the 48 States and the District of Columbia. Removing the asset test component of the eligibility determination process reduces staff time needed to process SNAP applications.
- **Simplified reporting** reduces staff time in processing cases by minimizing the amount of information households must report to the SNAP State agency. Rather than requiring households to report every change in circumstances, SNAP State agencies that use simplified reporting only require participants to report substantial changes that might affect their overall eligibility.

4. Staggered SNAP Rollout

The timeline and costs presented in this implementation plan assume Congress would authorize a geographically staggered rollout of SNAP across Puerto Rico. This would mean NAP and SNAP would be operating concurrently in Puerto Rico for a short time, which could result in disparities in benefit levels provided to households with similar characteristics in different geographic areas. A staggered rollout would have important benefits. Piloting the rollout process in a relatively small area would enable ADSEF to identify and troubleshoot any challenges to the certification and benefit issuance process while serving a limited population. FNS requires a live pilot prior to rollout of data systems. A staggered rollout would also increase the ability of ADSEF's staff to serve the entire eligible population; an all-at-once rollout would require enrolling more than 860,000 households in SNAP in a short time, which would present substantial challenges for staffing, accuracy, and timeliness. If Congress does not authorize a staggered rollout, ADSEF would need to adjust the implementation timeline presented here accordingly. For the purposes of this implementation plan, the study team assumes the rollout would take 6 months from the initial pilot to administration of SNAP throughout Puerto Rico.

5. Income Threshold, Deductions, and Basis for Benefits

The Food and Nutrition Act of 2008 establishes certain parameters for SNAP eligibility and benefits. The gross and net income tests are compared to the Federal Poverty Guidelines issued annually by the Department of Health and Human Services; these guidelines are calculated separately for Alaska and Hawaii. Net income is calculated by deducting certain expenses from gross income, including a standard deduction for each household and an excess shelter deduction. The standard deduction and the maximum excess shelter deduction are set at a different level in the 48 States and the District of Columbia, Alaska, Hawaii, Guam, and the U.S. Virgin Islands. Each year, the June value of the Thrifty Food Plan (USDA, 2021), produced by the Center for Nutrition Policy and Promotion and updated monthly, is used as the basis for benefits for the following fiscal year in the 48 contiguous States and the District of Columbia; the basis for benefits is estimated separately for Alaska, Hawaii, Guam, and the U.S. Virgin Islands. Congress could include income eligibility thresholds, deductions, and/or a basis for benefits specific to Puerto Rico in the legislation authorizing SNAP.

To estimate SNAP participation, the study team assumed the gross and net income test, the standard deduction, and the maximum excess shelter deduction in Puerto Rico would be the same as those in the 48 States and the District of Columbia; other choices could affect the number of participants and the costs of administering the program. To estimate benefit costs in Puerto Rico, FNS used the midpoint of the average benefits per household in the 48 States and the U.S. Virgin Islands. SNAP eligibility and benefits parameters in Puerto Rico may not be between those of the 48 States and the U.S. Virgin Islands. Household conditions that affect eligibility and benefits also may not be between those of the 48 States and the U.S. Virgin Islands. Consequently, actual benefit costs may differ.

6. Disasters

The timeline and costs also assume there are no major disasters in Puerto Rico during the implementation period. If Puerto Rico experienced another major disaster, such as Hurricanes Irma and Maria in 2017 or the COVID-19 pandemic of 2020–2021, staff time and attention that would otherwise be dedicated to the implementation of SNAP could be diverted to disaster response. However, it is hard to anticipate the extent to which a disaster could delay SNAP implementation, and the effect would likely vary based on the phase of the implementation process and the magnitude of the disaster.

7. Economic and Demographic Trends

The participation and cost estimates are based on data from 2019 to 2020, but the implementation timeline extends for 10 years. These estimates assume Puerto Rico's economic and demographic circumstances would be constant throughout this period.

8. Basis for Timeline Estimates

This plan offers estimates for each phase of the implementation timeline based on input from FNS and ADSEF; the experiences of other SNAP State agencies; and the study team's understanding of processes within the Federal Government, the Government of Puerto Rico, and ADSEF. The study team developed these estimates under the assumption Puerto Rico would be subject to the same requirements as other SNAP State agencies and would implement SNAP according to best practices. The study team also assumed all the Government of Puerto Rico's required processes for tasks, such as procurement, would be the same for SNAP implementation as they are for all other efforts. Given the unprecedented scale of this project, it is impossible to predict exactly how long each step would take. Certain implementation phases could occur more quickly if, for example, procurements required relatively few iterations during the approval and contracting process, or if ADSEF began the process of program design prior to congressional authorization of SNAP. The timeline could also be shorter if ADSEF makes changes to NAP that more closely align it with SNAP; the timeline presented in this plan is based on the changes to NAP that would be required as of FY 2021. Alternatively, implementation could take longer if, for example, data systems procurement or testing took longer than anticipated.

The study team considered whether the timeline could be shortened through an initial exclusive focus on the core functions of SNAP—eligibility determination and benefit issuance. However, the primary driver of the implementation timeline is the development of data systems, including systems for eligibility determination and benefit issuance. Little time would be saved with a narrower focus over the course of the full timeline. If ADSEF anticipates staffing constraints during rollout, they could consider delaying the rollout of program components such as SNAP E&T and SNAP-Ed.

B. Structure of the Plan

Chapter 2 of this implementation plan provides an overview of the implementation timeline. Details of each phase of the timeline are discussed in chapters 3–6. Chapter 7 presents estimates of SNAP participation in Puerto Rico, and chapter 8 provides cost estimates for SNAP implementation and ongoing SNAP operations. Organizational charts for FNS and ADSEF as of 2021 are presented in appendix A. Appendix B provides a detailed methodology for the microsimulation model that serves as the basis for the participation estimates. Appendix C contains detailed cost model data.

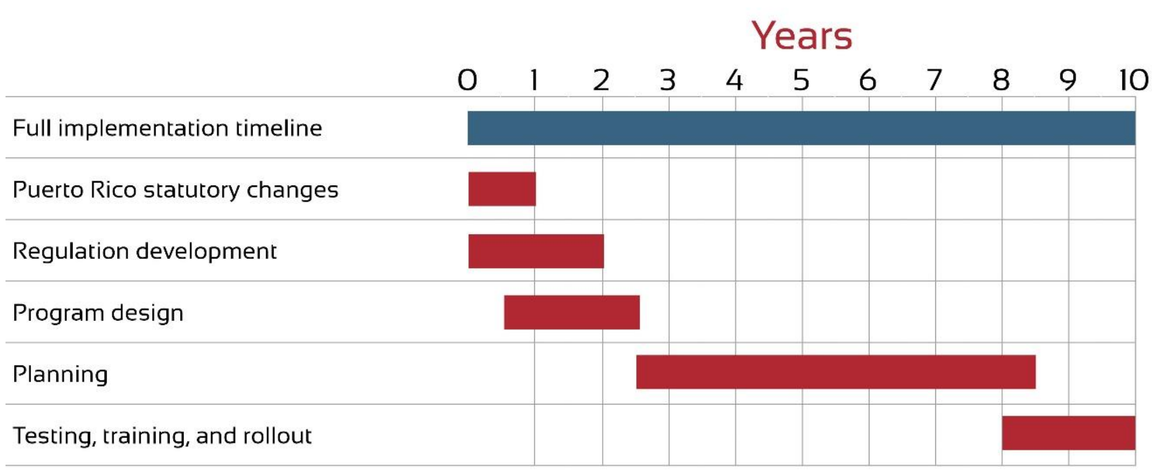
Chapter 2. Implementation Timeline: Overview

The study team drew on findings from interviews with FNS National Office, Mid-Atlantic Regional Office (MARO), and ADSEF staff; other government agencies in Puerto Rico; and other stakeholders to identify the sequence of steps ADSEF and FNS would need to take to implement SNAP in Puerto Rico. The initial step in implementing SNAP in Puerto Rico is for the U.S. Congress to pass legislation authorizing the expansion of the program to the Commonwealth; taking this step is outside the authority of FNS and ADSEF.

Key findings follow:

- The implementation process would have five stages: (1) Puerto Rico statutory changes; (2) regulation development; (3) program design; (4) planning (for data systems and general program implementation); and (5) testing, training, and rollout. Some of these stages would operate concurrently.
- Data systems planning would be the most time-consuming aspect of SNAP implementation. ADSEF would need to develop new data systems to operate SNAP. SNAP data systems would need to reflect the program design and policy decisions made by ADSEF, so the development of data systems requirements would only begin after those decisions were made. The planning phase would include developing and finalizing requirements, conducting a procurement process, and developing and testing the systems. Each step would require close coordination with FNS State Systems Office staff and could take years, even if major challenges do not arise.
- Altogether, full implementation of SNAP could take 10 years from Congress passing authorizing legislation to the time SNAP is operating throughout Puerto Rico (see figure 2.1). This estimated timeline could be shorter or longer depending on several factors described in this plan.

Figure 2.1. SNAP Implementation Timeline



The remainder of this chapter discusses the study team's methods for developing the timeline, SNAP implementation leadership and staffing, communications efforts that would span the implementation timeline, and certain standard processes that would occur at multiple points throughout the implementation process. The discussion includes references to specific groups within FNS and ADSEF; organizational charts for both groups as of 2021 are provided in appendix A.

A. Methods

The study team drew on three primary types of data to inform the development of the implementation plan and timeline:

- **Environmental scan and document review.** The study team gathered relevant NAP and SNAP documents from FNS, ADSEF, and internet searches covering areas relevant for this study. These data sources provided details regarding NAP and SNAP policies and procedures and were used to compare NAP and SNAP regulations and requirements.
- **Federal interviews.** Interviews with FNS staff gathered Federal perspectives on three topics: (1) policy and program changes needed to implement SNAP, (2) organizational and infrastructure changes needed to implement SNAP, and (3) potential facilitators and challenges associated with the transition from NAP to SNAP.
- **Site visit to Puerto Rico.** The study team conducted 65 semistructured interviews with ADSEF central, regional, and local office staff and a variety of other stakeholders, including authorized NAP retailers, the Financial Oversight and Management Board, community-based organizations, employers, partner government agencies, and emergency management partners. The interviews focused on NAP policies and procedures, anticipated challenges associated with the transition from NAP to SNAP, and available resources to support the transition.

The study team used the information gathered to identify the processes that would be necessary to implement SNAP, the amount of time each of those processes would take, and the parties that would be responsible for each process. Initial timeline estimates were based on information the study team collected about the time required to make similar changes in Puerto Rico or the States (e.g., regulation development in Puerto Rico, SNAP data systems updates in the States). The team used an iterative process to refine the timeline, incorporating feedback from subject matter experts (SMEs), FNS, ADSEF, and other stakeholders.

B. Leadership and Staffing for SNAP Implementation

To manage the implementation process, both FNS and ADSEF would need a core team of staff fully dedicated to this effort with additional staff members contributing to the implementation process as needed. This section describes the FNS task force and the ADSEF steering committee that would coordinate implementation activities.

1. FNS SNAP Implementation Task Force

The work of administering SNAP at the Federal level is conducted by staff members in a wide range of divisions, branches, and offices. To provide effective support to Puerto Rico during the implementation process, FNS should assemble a task force to facilitate coordination across its staff and with ADSEF. This task force would include, at a minimum, the following full-time staff across the implementation timeline:

- **Project manager.** FNS would need a strong project manager to coordinate all aspects of SNAP implementation.
- **SNAP policy expert.** The task force would need one person with broad knowledge of SNAP policy and operations within the FNS National Office to serve as a general subject expert on the task force.

- **Data systems management analyst.** FNS would also need a management analyst within the State Systems Office dedicated to supporting ADSEF throughout the development of SNAP data systems.
- **MARO policy analyst.** Regional Offices provide most direct technical assistance to SNAP State agencies. MARO would require a full-time staff member focused on coordinating with other members of the task force and other SNAP subject matter experts to provide that support to ADSEF throughout the implementation period.
- **Caribbean Area Office (CAO) analyst.** CAO provides on-the-ground support to nutrition assistance programs throughout Puerto Rico. CAO would need a full-time staff member with knowledge of SNAP policy and operations focused on the transition to SNAP in Puerto Rico.

Because this task force would need to communicate with ADSEF regularly about detailed technical matters, all core members should be bilingual in English and Spanish to the extent possible.[11] In addition to the core members, a wide range of additional staff would need to support the implementation effort, with varying commitments across the course of the implementation process. These SMEs would provide technical assistance and guidance to Puerto Rico and would also update FNS policies and procedures to prepare for the ongoing oversight of SNAP in Puerto Rico. The SMEs would be drawn from the Program Development Division (Certification Policy Branch and Program Design Branch), the Program Accountability and Administration Division (State Administrative Branch and Quality Control Branch), Retailer and Issuance Policy and Innovation Division, Office of Employment and Training, Civil Rights Division, Office of Policy Support, Financial Management, Office of Retailer Operations and Compliance, MARO SNAP Operations, and MARO Program Integrity. All work conducted by FNS staff to support SNAP implementation in Puerto Rico would be in addition to the current work FNS performs and would require additional funding and staffing.

2. ADSEF SNAP Implementation Steering Committee

ADSEF would assemble a SNAP implementation steering committee as soon as the Federal Government authorized SNAP in Puerto Rico. This committee would oversee all aspects of the SNAP design, planning, and implementation process. The committee should include a core group of full-time members because the work would require intense effort. Having dedicated staff could help minimize delays in SNAP implementation when others in ADSEF need to focus on acute issues in NAP, such as disaster response. The committee should include the following full-time staff:

- **ADSEF project manager**. ADSEF would require an experienced project manager to coordinate efforts within ADSEF and with FNS; because this committee member would play an important role coordinating efforts between ADSEF and FNS, the role should be held by someone fully bilingual in Spanish and English.[12]
- **SNAP SMEs**. Although FNS would provide technical assistance to ADSEF, ADSEF would need to engage long-term consultants or hire additional staff to provide SNAP administration subject matter expertise as the committee makes program design decisions and drafts program materials. The SMEs should have substantial experience administering SNAP at the State agency level, should be bilingual in English and Spanish, and should be fully focused on this effort throughout the implementation process.

[11] FNS could follow the guidelines recommended by the Interagency Language Roundtable to determine the language proficiency of new staff in Spanish. Potential candidates for any FNS position requiring bilingual skills would need to demonstrate proficiency in speaking, listening, reading, and writing in Spanish by taking an approved language proficiency test, such as the American Council of Teaching of Foreign Language Proficiency Assessments.

[12] ADSEF could also follow the guidelines recommended by the Interagency Language Roundtable to determine the language proficiency of new staff in Spanish and English.

- **Information technology (IT) project manager.** Successful development and implementation of SNAP data systems would require a dedicated project manager throughout the implementation process to ensure consistency between policy decisions and technical specifications. Ideally, the project manager would be an independent consultant or permanent staff member with experience leading the planning, development, testing, and implementation of complex SNAP or other human services data systems at the State agency level. This project manager should be bilingual in English and Spanish to facilitate communication among the FNS task force, the ADSEF steering committee, and the data systems contractor.
- **ADSEF support staff.** ADSEF's steering committee should have a dedicated full-time support staff person for administrative, logistical, and technical writing functions.

Data systems development would require additional staff. Seven full-time project coordinators on ADSEF's staff would be needed to manage the development of data systems, although contractors are anticipated to develop the systems.

ADSEF's steering committee would also require regular part-time effort from many other ADSEF staff or consultants:

- **ADSEF leadership.** ADSEF's leadership would need to play a significant role in SNAP implementation, overseeing all aspects of the process. ADSEF's administrator should anticipate dedicating 10–25 percent of their time to SNAP implementation throughout the implementation process.
- **ADSEF career staff.** Given the duration of the anticipated implementation timeline, ADSEF's politically appointed leadership may turn over several times between SNAP authorization and full implementation. It would be essential for the steering committee to incorporate at least six long-term staff members in leadership positions who have deep familiarity with ADSEF's day-to-day operations and personnel. These staff members would be expected to assume the following leadership roles in the following areas of SNAP administration: certification policy and benefit issuance, program integrity (including SNAP quality control [QC]), work requirements and SNAP E&T, disaster response, SNAP-Ed, and SNAP Outreach. These staff members would need to dedicate 50–100 percent of their time to SNAP implementation over the implementation period.
- **NAP frontline worker.** In addition to the administrator and career-staff leadership, ADSEF should include a frontline NAP worker on the steering committee. The frontline worker would bring current knowledge of local office staff, procedures, client interactions, and available resources. This frontline worker would spend 10 percent of their time on work associated with SNAP implementation.

Throughout the implementation process, other ADSEF employees would also need to contribute. For example, the Oficina de Asuntos Legales (Office of Legal Affairs) would work on memoranda of understanding and agreements with other agencies, the Oficina del Administrador Auxiliar de Recursos Humanos (Office of the Assisting Administrator for Human Resources) would recruit and onboard new staff, and the División de Contrato (Contract Division) would oversee the contracting process.

C. Communications

The SNAP implementation steering committee would work closely with FNS throughout the implementation process. The steering committee would also manage communications with other stakeholders about the timeline and process. Key stakeholders include the following:

- **Government of Puerto Rico.** The steering committee would respond to requests for information on the SNAP implementation process from the legislature and executive branch.
- **Financial Oversight and Management Board.** As long as the board has oversight responsibility for Puerto Rico's budget, the steering committee would need to provide updates related to the budget and any requirements for program administration specified by the board.
- **ADSEF staff.** SNAP implementation would affect all ADSEF employees whose work relates to NAP. The steering committee should provide regular updates to staff, possibly quarterly, through the first 7 years of the implementation process, and then more frequently as rollout approaches. ADSEF's regional offices serve as a conduit for information exchange between the central and local offices; they would continue to serve in this role during SNAP implementation.
- **Retailers.** The transition from NAP to SNAP would require retailers to meet a new set of eligibility requirements and go through a new authorization process. ADSEF should collaborate with FNS to provide annual updates and answer questions about the process. FNS would take over communications with retailers as implementation nears, including conducting a broad retailer communications campaign leading up to rollout.
- **NAP participants and the public.** The steering committee should prepare messaging for participants and the general public about the differences between NAP and SNAP and the timeline for SNAP implementation. ADSEF should engage a communications contractor to handle the communications campaign during the planning phase, with most of that campaign occurring during the testing, training, and rollout phase.

D. Standard Processes for SNAP Implementation

ADSEF and FNS would need to hire staff and procure goods and services during multiple phases of the implementation process; the processes summarized here apply to many phases described in the following chapters.

- **ADSEF hiring.** To hire new staff, ADSEF would need to go through a rigorous process involving many government agencies. This process would take 5–6 weeks before ADSEF could begin reviewing resumes. Petitions to fill a vacancy would need to be approved first by the Oficina de Gerencia y Presupuesto (Office of Management and Budget) and then by the Oficina de Administración y Transformación de los Recursos Humanos del Gobierno de Puerto Rico (Government of Puerto Rico Human Resources Administration and Transformation Office). Upon approval, ADSEF would publish the position announcement in the Registro Central de Convocatorias para Reclutamiento, Asenso y Adiestramiento en el Servicio Público (Central Register). At a minimum, the position announcement would need to be open for 2 weeks before the agency could begin evaluating any candidates. ADSEF would be responsible for reviewing resumes, interviewing candidates, and hiring.

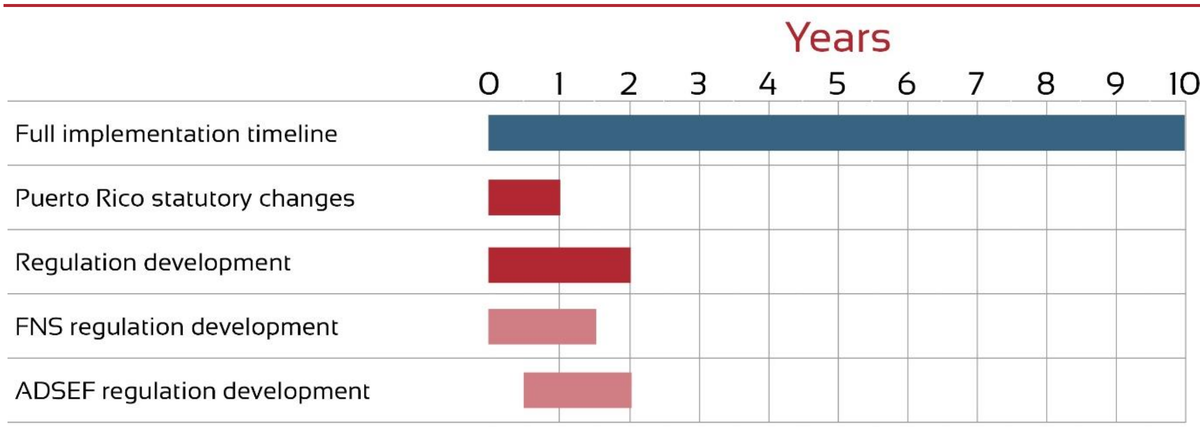
- **ADSEF procurement**
  - **Nonprofessional services and goods.** ADSEF would likely need to procure office equipment for new staff and SNAP materials (e.g., electronic benefit transfer [EBT] cards, brochures, other printed documents). The purchase of nonprofessional services and equipment would include processes mandated by law[13] that can vary based on the anticipated value of the purchase:
    - $15,000 or less. These items can be purchased by the Oficina de la Administradora Auxiliar de Servicios Administrativos (Office of the Assisting Administrator for Administrative Services) with ADSEF departmental approval following the guidelines described in Section 7.1.2, Procedure for Processing an Informal Purchase.
    - Greater than $15,000 and not exceeding $100,000. These procurements are governed by Article 7.2 describing the Informal Bid Process.
    - Greater than $100,000. These procurements must be released as an open competition. In these cases, ADSEF works with the Purchasing Office of the Administración Auxiliar de Adquisiciones (Auxiliary Administration of Acquisitions) to release a call for bids. The auxiliary administrator of acquisitions or the bidding officer prepares the Invitation to Formal Bid, a packet containing the information necessary for soliciting competitive bids and submits those documents to the Junta de Subastas (Auction Board) for review. The Auction Board is then responsible for posting the solicitation, receiving sealed bids, evaluating the proposals, and awarding the contract. Purchases of IT equipment must be authorized first by Puerto Rico Information and Technology Services.
    - ADSEF would also need to obtain FNS approval for purchases of IT equipment and services.
  - **Professional services**. After identifying a need for professional services such as consultants or contractors, ADSEF works with the Department of Budget and Finance, which reviews and assigns funding for the services. Approvals are then sent to the purchasing department. After approvals are received from those two departments, ADSEF drafts the request for proposals. The Administración de Servicios Generales (General Services Administration) then handles the solicitation process in collaboration with the department issuing the request for proposals. Professional service procurement also requires FNS approval.
- **FNS hiring**. Hiring managers request a position listing on USAjobs.gov, the central site for all Federal Government hiring. Hiring typically takes about 80 days.
- **FNS procurement**. FNS would need to issue a new procurement or expand the scope of existing contracts to support implementation of SNAP in Puerto Rico, particularly regarding retailer oversight and program integrity. FNS would first assess the requirements and how to purchase these services. If the scope of services required for implementing SNAP in Puerto Rico fell within an existing contract, the Contracting Officer's Representative would work with the Contract Management Division (CMD) to submit the required paperwork for an extension of services through a task order or other contract modification. If FNS determined the scope of work required did not fall within an existing contract, or the scope exceeded what would be permitted under an existing contract, FNS would work with CMD to issue a new solicitation on SAM.gov.

[13] Act 73, passed in 2019, as described in Regulation 9230 of the Uniform Regulation for Purchases and Bids of Goods, Works and Nonprofessional Services of the Administración de Servicios Generales (General Services Administration).

Chapter 3. Statutory Changes and Regulation Development Timeline

Following the authorization of SNAP in Puerto Rico by the U.S. Congress, Puerto Rico's legislature would need to pass separate legislation. Both FNS and ADSEF would need to revise regulations. Together, these portions of the SNAP implementation process could last 2 years (figure 3.1). The time required for the statutory changes and regulation development phase would be driven primarily by the time needed to revise Federal regulations, which would depend in part on the degree of authority Congress delegated to FNS and the complexity of the regulatory changes. If the authorizing legislation leaves relatively few parameters of program administration to the discretion of FNS, this phase could be shorter.

Figure 3.1. Statutory and Regulatory Timeline



Note: ADSEF = Administración de Desarrollo Socioeconómico de la Familia (Administration for the Socioeconomic Development of the Family)

Section A of this chapter describes the statutory changes Puerto Rico's legislature would need to make, and section B discusses the rulemaking process for both FNS and ADSEF.

A. Puerto Rico Statutory Changes

Puerto Rico could begin making the necessary statutory changes to implement SNAP as soon as the U.S. Congress authorizes SNAP in Puerto Rico. This stage of the implementation process would take 6–12 months.

Puerto Rico's legislature would consider statutory provisions for the operation of SNAP in Puerto Rico and would also need to appropriate funds for SNAP implementation and administration. The legislature would need to work with the Puerto Rico Financial Oversight and Management Board to determine the appropriations; the Financial Oversight and Management Board is responsible for ensuring appropriations are consistent with Puerto Rico's financial plan. The legislature could also choose to codify certain aspects of SNAP administration. For example, many State legislatures have ended lifetime bans on SNAP participation for individuals convicted of drug-related crimes.

Puerto Rico's Governor would need to delegate SNAP administration to an appropriate agency. For the purposes of this plan, the study team assumed the Governor would designate SNAP administration to ADSEF, which is responsible for NAP.

B. Regulation Development

To implement SNAP in Puerto Rico, both FNS and ADSEF would need to go through the rulemaking process to implement new regulations. The Federal rulemaking process for accomplishing these tasks would likely take 18 months for FNS, although this would depend on the complexity of the required regulations. If the authorizing legislation leaves fewer parameters of program administration to the discretion of FNS, the rulemaking process could take less time. ADSEF would then need to take these Federal regulations into consideration before finalizing its regulations. Although ADSEF may not need a full 18 months to develop its regulations, as shown in figure 3.1, the full regulation development phase could take an estimated 24 months because of the time required to finalize Federal regulations, which must happen before ADSEF can finish its rulemaking process.

1. Federal Regulation Development

Upon passage of Federal legislation authorizing SNAP in Puerto Rico, the FNS implementation task force would begin the rulemaking process by drafting an implementing memorandum. This implementing memorandum would describe which components of the legislation go into effect without further action and which components require further action, such as Federal regulations or State approval, before SNAP can be implemented.

FNS would then need to update SNAP regulations per the implementing memorandum. Broadly, this would entail removing the NAP block grant regulations, including Puerto Rico in the definition of a State, and incorporating any provisions for which Puerto Rico would be treated differently than the 48 contiguous States and the District of Columbia. Additional detail on the regulations that would need to be updated are included in the feasibility report (Thorn et al., 2022).

Within FNS, the Program Development Division would draft the proposed regulations.[14] The Program Development Division would also draft the Civil Rights Impact Analysis (CRIA), which would focus on the effects of the proposed rules on protected classes and groups, as well as mitigation, outreach, and monitoring strategies for potential impacts on protected groups. The FNS Civil Rights Division would be responsible for reviewing and finalizing the CRIA. Separately, the SNAP Research and Analysis Division in the Office of Policy Support would be responsible for conducting a regulatory impact analysis. This analysis would estimate the costs of the new regulations, including the costs of SNAP benefits and administrative costs to the Federal Government and Puerto Rico in excess of current costs for NAP.

The Planning and Regulatory Affairs Office within the Office of Policy Support would be responsible for facilitating the review process for the regulations. This process is complex and includes reviews by multiple groups within FNS, other groups within USDA, and the Office of Management and Budget. The rulemaking process also includes an opportunity for public comment on the proposed rule. Typically, public comments are accepted for 60 days after publication of the proposed regulations in the *Federal Register*; responses to those comments from FNS must be incorporated in the Final Rule.

2. Puerto Rico Regulation Development

ADSEF's SNAP implementation steering committee would need to revise Puerto Rico's regulations to cease NAP operations and implement SNAP. This would entail drafting new program eligibility regulations and removing the regulations that establish guidelines for retailer certification and benefit

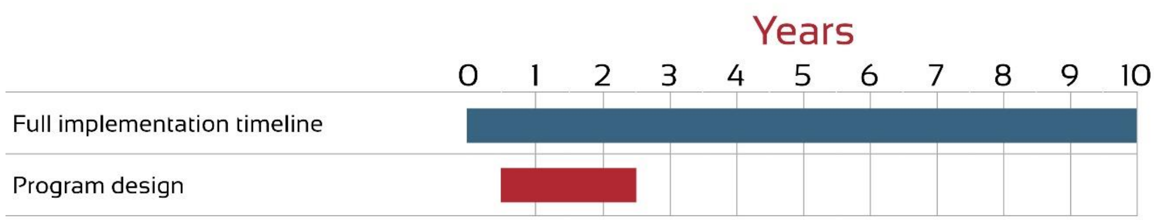
[14] In accordance with the Paperwork Reduction Act of 1995, the proposed regulations would include the changes in the information collection burden that would result from the adoption of the proposals in the rule.

redemption. As with the Federal rulemaking process, regulations in Puerto Rico would need to be reviewed by several parties within the Department of the Family, other government agencies, and the public.

Chapter 4. Program Design Timeline

After the U.S. Congress authorizes SNAP, ADSEF would need to convene the SNAP implementation steering committee. With this committee in place, ADSEF would begin the program design process with technical assistance from FNS. This process could take 24 months (see figure 4.1). This estimate assumes the program design timeline encompasses a full range of education, technical assistance, and decisionmaking related to SNAP policy and procedure, but if ADSEF and FNS begin this process prior to authorization, this phase of implementation could take less time.

Figure 4.1. Program Design Timeline



During the program design phase, ADSEF's SNAP implementation steering committee would lead the work of making the major decisions about how SNAP would be implemented in Puerto Rico. The steering committee would review SNAP materials to learn the details of program administration, participate in State exchanges (i.e., visits to other State agencies) to see firsthand how other State agencies administer SNAP, and attend SNAP policy conferences and briefings to learn about best practices in SNAP administration. The steering committee would also review all the required components of the annual SNAP State Plan of Operations and the routine reports State agencies submit. The steering committee would integrate civil rights requirements in all program design decisions and consider how to ensure meaningful access to the program for all applicants, regardless of language proficiency[15] and taking into consideration reasonable accommodations for individuals with disabilities. The steering committee must complete this phase of learning the details of SNAP policy and requirements and make key decisions about program design before the committee begins the process of planning data systems requirements.

The FNS National Office and MARO, led by the SNAP implementation task force, would need to provide substantial technical assistance and oversight to ADSEF. Task force representatives should meet with ADSEF's SNAP implementation steering committee at least weekly throughout the program design phase; help the steering committee obtain SNAP guidance, handbooks, and other materials; and provide responses to the steering committee's questions about SNAP and feedback on its preliminary decisions.

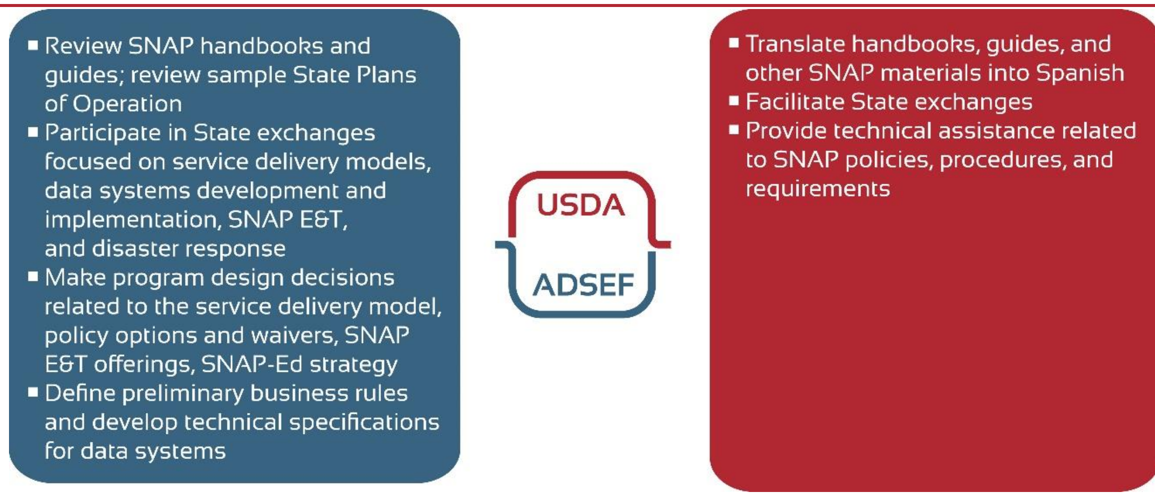
While many ADSEF staff understand, read, and write in English, their level of English proficiency varies. To facilitate understanding of SNAP rules and policy guidance among all ADSEF staff members, FNS would translate all applicable program materials into Spanish early in the program design phase and make the materials available to ADSEF. This would prevent staff from interpreting or translating rules and policy guidance in potentially unintended ways in the future, especially as staff retire or leave and

[15] While regulations require accommodations for applicants with limited English proficiency, Spanish is the dominant language in Puerto Rico, potentially posing challenges for serving applicants with limited Spanish proficiency, including English speakers and others. ADSEF should plan to accommodate the linguistic diversity of its communities in all design considerations. This means they would consider both limited English and limited Spanish speakers following the single-language minority guidelines for households with low incomes in a project area as specified by 7 CFR 2.2.4(b) Bilingual Requirements.

new staff are hired. Given the quantity of materials that would need to be translated in a short period of time, FNS could consider engaging a contractor for this work. Similarly, interpretation services could be contracted to facilitate oral communication.

This chapter describes the work of the program design phase in eight substantive areas: (1) certification and benefit issuance, (2) program integrity, (3) retailer authorization and management, (4) work requirements and SNAP E&T, (5) disaster response, (6) SNAP-Ed, (7) program administration,[16] and (8) data systems. The primary responsibilities of ADSEF and FNS during this phase are summarized in figure 4.2. The work in each substantive area would need to occur simultaneously; the areas are provided in the order they are presented in the feasibility report. The subsection for each substantive area provides an overview of the main decisions and options, identifies responsible parties, and discusses timing.

Figure 4.2. Key Features of the Program Design Phase



Note: ADSEF = Administración de Desarrollo Socioeconómico de la Familia (Administration for the Socioeconomic Development of the Family); SNAP-Ed = SNAP Nutrition Education and Obesity Prevention Services grant program; SNAP E&T = SNAP Employment and Training

A. Certification and Benefit Issuance

Many of the core decisions about program design relate to certification and benefit issuance. ADSEF would be responsible for making decisions related to certification and benefit issuance program design; the FNS Program Development Division and Program Administration and Accountability Division and MARO's Operations Branch would provide technical assistance throughout this phase.

For more information on policies related to SNAP eligibility and benefit determinations, see chapter 6 of the feasibility report. For more information on certification and benefit issuance processes, see chapter 7 of the feasibility report.

1. Service Delivery Model

One of the most significant decisions ADSEF's SNAP implementation steering committee would need to make during the program design phase would center on the service delivery model, which describes the general organization of work related to certifying participants and issuing benefits. For the purposes of estimating costs, the study team assumes ADSEF would select a casebanking service delivery model. In

[16] While program design considerations for civil rights requirements are embedded in all areas of SNAP administration, they are specifically addressed within the program administration section.

this model, cases would first be associated with a specific geographic region and then assigned to the next available eligibility worker in that region. A call center would answer questions about SNAP, make appointments, and process basic changes to casefiles, such as change in address, but would not do any work related to eligibility determination or benefit issuance. As of the time of data collection for this study, ADSEF planned to implement a similar model of NAP service delivery in conjunction with the launch of their online portal for NAP certification and recertification. Since that time, ADSEF has implemented a digital portal for NAP certification and recertification.

ADSEF could consider other service delivery models. For example, some SNAP State agencies have elected to concentrate most eligibility determination and benefit issuance work in their call centers, with a limited number of local offices for in-person interaction with applicants and participants. ADSEF's SNAP implementation steering committee could consider participating in a State exchange focused on service delivery models and its implications for staffing, administrative costs, and program integrity. ADSEF's decisions about the service delivery model could affect the implementation timeline and estimated costs; a model that deviates substantially from the NAP model would require additional steps and resources. For example, developing a centralized model would require additional steps to close local offices and establish a call center with specialized software but could save administrative costs over the long term. Decisions about the service delivery model should include consideration of the customer experience and be consistent with any guidance FNS issues in response to the *"Executive Order on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government"* (Executive Order No. 14,058, 2021).

2. Sources of Data Matches

SNAP regulations require State agencies to conduct several types of data matches during the certification process; SNAP State agencies may also conduct batch matches on a routine basis. The following data matches are required:

- Death Master File, administered by the Social Security Administration
- Electronic Disqualified Recipient System (known as eDRS), administered by FNS[17]
- National Directory of New Hires, administered by the Department of Health and Human Services Administration for Children and Families
- Prisoner Update Processing System or Prisoner Verification System, administered by the Social Security Administration
- Systematic Alien Verification for Entitlements (known as SAVE), administered by the Department of Homeland Security United States Citizenship and Immigration Services[18]
- Gambling and lottery winnings, from a source administered by Puerto Rico
- Income Eligibility and Verification System (known as IEVS), administered by Puerto Rico[19]

Many SNAP State agencies use additional national and State data matches to verify households' circumstances. During the program design phase, the SNAP implementation steering committee should identify the data matches ADSEF would use to administer SNAP and determine the steps needed to gain access to those data sources. In some cases, the process of obtaining access may take several years, so

[17] FNS would need to incorporate Puerto Rico into the electronic Disqualified Recipient System and any standard reports or dashboards that use data from the system.
[18] ADSEF would need to include the agreement with the Department of Homeland Security in the State Plan of Operations.
[19] ADSEF would need to include information on the Income Eligibility and Verification System in the State Plan of Operations.

the steering committee would need to develop a timeline for obtaining data by the beginning of the testing, training, and rollout phase. The steering committee would also need to account for the costs of data matches in its planning.

3. Policy Options

SNAP regulations allow SNAP State agencies to choose from a variety of options for several key aspects of the certification and benefit determination process. The SNAP State Options Report provides a partial list of available policy options (USDA FNS, 2018b). Key options include the following:

- BBCE rules, which expand categorical eligibility to households that receive noncash benefits funded by TANF or Maintenance of Effort funds
- Standard utility allowances, which would replace actual utility costs; may be mandatory or optional for participants
- Reporting requirements, which specify what types of changes in circumstances participating households need to report to the SNAP State agency and the frequency with which they must report those changes; State agencies commonly use simplified reporting (households report changes periodically), although some SNAP State agencies require reports as changes occur[20]
- Certification length, which may vary with certain household characteristics (e.g., a SNAP State agency may certify households where all adult members are elderly or disabled for up to 24 months; other households may be certified for up to 12 months)
- Treatment of child support payments as either an exclusion from gross income or as an income expense deduction

ADSEF should make decisions about the policy options by the end of the program design phase. If ADSEF elects to adopt standard utility allowances, it would need to identify and analyze data on typical utility costs to establish the standard allowances. The value of the standard utility allowances would need to be determined during the planning phase.

4. Waivers

Many SNAP State agencies request waivers of certain program rules. The SNAP Certification Waivers Database lists current waivers (USDA FNS, 2021e). Common waivers ADSEF may wish to consider include the following:

- Reinstate eligibility, which allows a SNAP State agency to reinstate the eligibility of a household without requiring a new application if the household recently became ineligible because it did not provide requested verification.
- Deny applications before the 30th day, which allows a SNAP State agency to deny an application after 10 days if a household fails to provide required verification, as long as the interview has been conducted.
- Waive recertification interview for households with elderly individuals and persons with disabilities with no earned income.

[20] This information should be included in the policy and procedures manual and is a required component of the State Plan of Operations if the steering committee elects to use simplified or quarterly reporting for any categories of households.

- Waive the ABAWD time limit (see section D2 of this chapter).

During the program design phase, ADSEF should research common waivers, identify waivers it would likely request, and learn the process for requesting waivers. ADSEF would submit waiver requests during the planning phase.

5. Demonstration Projects

The Food and Nutrition Act of 2008 allows SNAP State agencies to conduct demonstration projects that are consistent with the overall goals of the program and might improve the delivery of program benefits to eligible households, subject to certain limitations such as cost neutrality. Demonstration projects require the explicit approval of FNS. Under NAP, ADSEF reserves a small portion of benefits for use at Family Markets, which are farmers' markets operated jointly with Puerto Rico's Departamento de Agricultura (Department of Agriculture). The steering committee could discuss with FNS whether the Family Markets might qualify as a demonstration project and, if so, determine the appropriate steps for establishing them under SNAP.

ADSEF could also consider requesting two common demonstration projects. The Elderly Simplified Application Project (known as ESAP) attempts to increase participation among the elderly population by streamlining the application and certification processes. Typically, these demonstration projects include a shortened application, reduced requirements for verifications, and extended certification periods. FNS provides a guidance document to SNAP State agencies interested in applying for this demonstration project (USDA FNS, 2015). Many State agencies also operate a Standard Medical Deduction Project (known as SMD), in which a standard medical deduction is applied when calculating the net income of elderly and disabled households with documented medical expenses greater than $35 per month; this standard deduction would equal average medical expenses for elderly or disabled SNAP households. To apply for this demonstration project, ADSEF would need to identify a source of data on unreimbursed medical expenses to estimate average costs.

6. Basis for Benefits

If Congress requires FNS to establish a basis for benefits for SNAP in Puerto Rico other than the Thrifty Food Plan used in the 48 contiguous States, or the basis used in Alaska, Hawaii, Guam, or the U.S. Virgin Islands, the FNS Center for Nutrition Policy and Promotion (CNPP) would need to determine an approach for establishing this basis for benefits. Potential options range from simply applying a multiplier to the Thrifty Food Plan to collecting data on food consumption and prices in Puerto Rico. If CNPP selects a methodology that requires primary data collection, it would need to obtain funding, issue a solicitation, and engage a contractor for data collection during the program design phase. The Thrifty Food Plan calculation would need to be completed by the fourth year of the planning phase.

B. Program Integrity

FNS and SNAP State agencies conduct QC reviews, work to prevent participant fraud and investigate cases of potential fraud, and conduct management evaluations at the SNAP State agency and project area level.

> For more information on policies and procedures related to program integrity in SNAP, see chapter 8 of the feasibility report.

Throughout this phase, the FNS Program Accountability and Administration Division and MARO's Integrity Branch would need to provide technical assistance that prepares ADSEF for program integrity planning and operations. This may include providing ADSEF with program integrity documentation and guidance and including ADSEF in program integrity-related briefings and meetings open to the SNAP State agencies.

1. SNAP QC

During the program design phase, ADSEF's SNAP implementation steering committee would need to begin learning about SNAP QC requirements by reviewing materials such as the *SNAP Quality Control Review Handbook* (*FNS 310*) (USDA FNS, 2021b), which describes requirements for SNAP State agency QC policies and procedures, and the *Quality Control Sampling Handbook* (*FNS 311*) (USDA FNS, 2011) and SNAP regulations (7 CFR 275.11), which describe requirements for selecting the QC samples. These manuals outline QC requirements and the array of decisions ADSEF would need to make to operate SNAP QC; some of these requirements and decisions would inform the business requirements for ADSEF's data systems. The steering committee would also need to decide whether to adopt the SNAP Quality Control System (QCS) and the associated Automated Form 380 or select some other approach for reporting. The steering committee would also need to make an initial decision about which of the options provided in SNAP regulations ADSEF would take to determine its QC sample size, how it would organize its QC staff to ensure the coverage required to conduct face-to-face QC interviews for recipients throughout Puerto Rico, and whether to request a waiver of the in-person QC interview requirement for households receiving less than $100 per month in benefits.

2. Participant Fraud Investigation and Prevention

The steering committee would need to outline a general approach to fraud investigation and prevention during the program design phase. SNAP State agencies are required to establish agreements with local law enforcement agencies for the prosecution of fraud cases. At this point, ADSEF should have initial conversations with the Puerto Rico Departamento de Justicia (Department of Justice) about establishing such an agreement.

ADSEF would need to prepare a claims management plan that describes its policies and procedures for establishing and collecting claims from participants. The claims management plan could be incorporated into the policy and procedures manual. During this phase, the steering committee would review the requirements and sample claims management plans from other SNAP State agencies. ADSEF could request technical assistance regarding the Treasury Offset Program requirement because Federal income taxes are not collected in Puerto Rico.[21]

3. Management Evaluations

SNAP regulations require FNS to conduct management evaluations of SNAP State agencies, and State agencies similarly must conduct management evaluations of their own local operations. These evaluations are intended to provide a systematic method of monitoring and assessing program operations, a basis for project areas to improve, and a continuing flow of information between the project areas, the State agencies, and FNS about problems in policy and procedure. Program implementation management evaluations also include a civil rights component.

During the program design phase, ADSEF would need to begin learning about how to prepare for Federal management evaluations and how to conduct State management evaluations. FNS produces Management Evaluation Guides for the Regional Offices to use during their management evaluations of the State agencies; many SNAP State agencies use the same guides to support their internal

[21] Residents of Puerto Rico are exempt from Federal income taxes but pay the Federal Insurance Contributions Act (FICA) tax, which funds Social Security and Medicare.

management evaluation process. The steering committee would review these materials during this phase.

4. Civil Rights Compliance Reviews

FNS also conducts Civil Rights Compliance Reviews to determine if SNAP is being administered in compliance with civil rights requirements at the SNAP State agency and local levels. Any State agency or local agency administering SNAP must be deemed in compliance with civil rights requirements prior to approval for Federal financial assistance. This determination takes place during a Preapproval/Preaward Compliance Review. Afterwards, Postaward or Routine Compliance Reviews are conducted regularly, following SNAP regulations with a focus on evaluating compliance with civil rights law, regulations, policies, instructions, and guidance. State agencies also conduct reviews to ensure local agencies and subrecipients within a program area are compliant with civil rights requirements. ADSEF would need to use the program design phase to learn how to prepare for an FNS Civil Rights Compliance Review and how to conduct these reviews at the State agency level.

C. Retailer Authorization and Management

The transition of retailer management from ADSEF to FNS would be a substantial change. During this phase, the FNS Retailer and Issuance Policy and Innovation Division (RIPID) and Office of Retailer Operations and Compliance (ROC) would need to ensure all retailer-facing materials are available in Spanish. ADSEF and ROC would also work jointly to produce initial communications materials to current NAP-authorized vendors and other retailers, alerting them to the change and providing timelines for applying for SNAP authorization and obtaining SNAP EBT equipment. ADSEF and RIPID should also collaborate to provide a venue for retailers to ask questions about the change. FNS would need to provide interpretation services for oral communication with Spanish-speaking retailers if bilingual staff are not available.

> For more information on policies and procedures related to retailer authorization and management, see chapter 9 of the feasibility report.

D. Work Requirements and SNAP E&T

The SNAP implementation steering committee would have a wide range of decisions to make related to SNAP work requirements and SNAP E&T. The steering committee would begin by reviewing available materials from FNS, including the SNAP E&T State Plan Handbook (USDA FNS, 2021c) and the SNAP E&T Program Toolkit (USDA FNS, 2021d).

> For more information on policies and procedures related to work requirements and SNAP E&T, see chapter 10 of the feasibility report.

1. General Work Requirements

SNAP regulations stipulate certain participants are subject to general work requirements. During the program design phase, the steering committee should learn about SNAP general work requirements and establish preliminary plans for enforcing them. SNAP participants who are not exempt according to Federal guidelines would need to register for work. The steering committee should begin conversations about these requirements during this phase and should make plans for tracking and enforcing compliance with work requirements, including plans for disqualifying participants who fail to meet work requirements. The Disqualification for Failure to Meet Work Requirements Plan—either as a stand-alone document or as part of the SNAP State agency policy and procedures manual—is a required component of the State Plan of Operations.

2. Able-Bodied Adult Without Dependents Work Requirement and Time Limit

In addition to the general work requirements, SNAP imposes a time limit on participation for able-bodied adults without dependents (ABAWDs) unless they meet an additional work requirement. FNS allows SNAP State agencies serving areas of high unemployment or a lack of employment opportunities to apply for waivers of the ABAWD time limit for the affected areas (e.g., full State or territory, certain geographic areas); these waiver requests must include data on specific economic measures. During the program design phase, ADSEF should learn about the ABAWD work requirement and the process for requesting a waiver of the ABAWD time limit and identify potential sources of economic data to justify those requests in the event a waiver is needed. The steering committee should also make plans for tracking and enforcing compliance with the ABAWD work requirement.

3. SNAP E&T

SNAP requires State agencies to offer SNAP E&T services to at least some participants but allows much flexibility in choosing how to implement those services. During this phase, ADSEF's SNAP implementation steering committee would need to determine the role that SNAP E&T would play in the broader workforce development system in Puerto Rico and the role of SNAP E&T as a work requirement. Upon those determinations, the steering committee would need to make several key decisions about the types of SNAP E&T components to provide and the criteria for SNAP E&T eligibility. These could range from relatively light-touch components, such as supervised job search, to more robust job training programs. In addition to the SNAP E&T components, Puerto Rico would need to provide other SNAP E&T services, including case management and participant reimbursements for costs necessary for participation. Although not required, SNAP State agencies are also encouraged to conduct assessments, for example, to determine participant barriers and/or skills levels. The steering committee would need to determine whether ADSEF would operate SNAP E&T in house or establish contracts with external training providers; the Departamento de Desarrollo Económico y Comercio (Department of Economic Development and Commerce) and the American Jobs Centers could be potential providers for SNAP E&T services.

Finally, the steering committee would need to determine if SNAP E&T would be mandatory for any participants. ADSEF would need to determine how it would track participation and enforce disqualifications for any participants subject to mandatory SNAP E&T. As part of the planning process for deciding whether to operate a mandatory program, ADSEF would also need to consider whether its SNAP E&T budget sufficiently provides available and appropriate openings for each individual who would be subject to mandatory SNAP E&T. ADSEF could consider participating in a State exchange focused on work requirements and SNAP E&T to learn more about how these components of SNAP are implemented. Ideally, the State exchange partner would have a SNAP E&T program similar to the one ADSEF would likely implement. The FNS Office of Employment and Training would need to recommend potential exchange partners and help facilitate the exchange.

Although regulations require that State agencies offer SNAP E&T, the State agencies may meet these requirements with a relatively small program. One possibility for ADSEF's steering committee to consider is to plan a small, voluntary SNAP E&T program for the initial years of SNAP implementation, and then build a more robust program once SNAP has been fully implemented and is running smoothly.

Throughout this phase, the FNS Office of Employment and Training and MARO's SNAP E&T Coordinator would need to provide technical assistance that prepares ADSEF for SNAP E&T planning and operations. This may include providing ADSEF with SNAP E&T documentation and guidance, including ADSEF in SNAP E&T briefings and meetings open to the SNAP State agencies, and helping facilitate the State exchange.

E. Disaster Response

During the program design phase, ADSEF's SNAP implementation steering committee would need to learn about disaster response in SNAP. Disaster response can include both operating a D-SNAP and implementing other SNAP and EBT disaster waivers.

For more information on policies and procedures related to disaster response, see chapter 11 of the feasibility report.

D-SNAP differs greatly from disaster funds Congress has provided to supplement NAP in the past. To learn about the requirements for planning and operating a D-SNAP, ADSEF would need to review existing D-SNAP documentation, such as the Disaster SNAP Guidance (USDA FNS, 2014), the State Agency D-SNAP Toolkit (USDA FNS, n.d.c), and the various templates and forms used for D-SNAP request and postdisaster reporting. ADSEF should also review D-SNAP plans developed by SNAP State agencies with strong track records for D-SNAP operations, particularly State agencies with experience operating a D-SNAP after a major hurricane.

ADSEF should work with the FNS Certification Policy Branch and potentially regions with a high number of disasters, such as the Southeast or Southwest Regional Office, to plan and participate in a State exchange with a State agency that has strong track record for successful D-SNAP operation. ADSEF should use this opportunity to learn how State agencies plan for, request, and operate a D-SNAP and how D-SNAP can be combined with SNAP retailer and EBT disaster waivers such as mass SNAP replacements, mass supplemental SNAP benefits, and hot food waivers for a robust disaster response. ADSEF could also learn about the steps necessary for individual disaster replacements; individual disaster supplements; D-SNAP reporting, including the daily FNS 292-B issuance report; and postdisaster reporting.

Throughout this phase, the FNS Certification Policy Branch and the MARO Operations Branch would need to provide technical assistance regarding disaster response. This may include providing ADSEF with D-SNAP documentation and guidance, including ADSEF in D-SNAP briefings and meetings open to the State agencies, and helping facilitate the State exchange.

F. SNAP-Ed

FNS funds grants to the SNAP State agencies for SNAP-Ed. State agencies use these funds for direct nutrition education; they are also required to implement multilevel interventions and/or public health initiatives in communities with substantial low-income populations (i.e., at least 50 percent). ADSEF's SNAP implementation steering committee would need to learn about SNAP-Ed by reviewing the SNAP-Ed Plan Guidance (USDA FNS, n.d.a), the SNAP-Ed Toolkit (UNC Center for Health Promotion and Disease Prevention 2018), and the SNAP-Ed Evaluation Framework (USDA FNS, 2016). The steering committee should also meet with other nutrition education and obesity prevention stakeholders, such as the Comisión de Alimentación y Nutrición de Puerto Rico (Puerto Rico Food and Nutrition Commission) and the Expanded Food and Nutrition Education Program at the Universidad de Puerto Rico—Mayagüez (University of Puerto Rico—Mayagüez). During this stage, the steering committee would need to identify partner agencies and organizations for the delivery of SNAP-Ed projects in local communities.

For more information on policies and procedures related to SNAP-Ed, see chapter 12 of the feasibility report.

Throughout this process, the FNS State Administration Branch and MARO would provide technical support to ADSEF. This may include providing ADSEF with SNAP-Ed documentation and guidance; involving ADSEF in SNAP-Ed briefings and meetings open to the State agencies; providing additional insight into successful SNAP-Ed needs assessments, partnerships, implementations, and evaluations; and connecting ADSEF with SNAP-Ed administrators in State agencies that are similar in size (either area or population). The FNS State Administration Branch and MARO would also engage ADSEF in discussions about a fair and reasonable initial SNAP-Ed grant amount. ADSEF's grant amount would not be set at this early stage; rather, these discussions would help provide ADSEF with a framework as the agency transitions from the design to active planning phase and begins partner discussions.

G. Program Administration

For more information on policies and procedures related to program administration, see chapter 13 of the feasibility report.

During the program design phase, ADSEF's SNAP implementation steering committee would need to make several decisions about SNAP administration. SNAP regulations require State agencies to define project areas, which are political subdivisions designated by the State agency as the administrative unit for program operations. Many States use counties as their SNAP project areas. ADSEF could designate its 10 regions as project areas, or it could consider using municipalities, which are similar to counties in the States. Certain SNAP requirements, such as the frequency of management evaluations, vary based on the caseload of the project area.

The steering committee would also need to consider ADSEF's organizational structure more generally and make plans for reorganization. Although substantial reorganization would not be required, ADSEF would no longer need its Oficina de Inspección y Certificación (Office of Inspection and Certification, OIC) for retailers under SNAP, would need to revise the structure of its nutrition education program, and would need to develop a team for the administration of SNAP E&T. While considering these changes, ADSEF could also consider making changes to other aspects of its organizational structure; for the purposes of this implementation timeline, the study team assumed ADSEF would only make the minimal required organizational changes.

Other aspects of program administration would largely function in SNAP the way they do in NAP, albeit with somewhat greater effort due to specific regulations (e.g., ensuring civil rights, providing for fair hearings) and reporting requirements. For many administrative functions, ADSEF would be primarily responsible for adhering to Federal guidelines in these areas and must incorporate these into the program design. Four key aspects of program administration—outreach, fair hearings, civil rights, and financial management and reporting—are discussed in more detail in this section.

1. Outreach and Communications

During the program design phase, the steering committee would coordinate with the Oficina de Relaciones de la Comunidad (Community Relations Office) to develop and build on recent experiences with mass communications in Puerto Rico and ensure practices align with SNAP regulations and guidance. The steering committee would also learn about the requirements for developing a State Outreach Plan, as described in the State Outreach Plan Guidance (USDA FNS, 2017) and consider which outreach activities are allowable for reimbursement under SNAP.

2. Fair Hearings

The steering committee would use the program design phase to learn about SNAP's requirements for fair hearings, with a focus on any technical requirements for future data systems.

3. Civil Rights

SNAP State agencies are prohibited from discriminating against any applicant or participant in any aspect of program administration, including the certification of households; the issuance of coupons; the conduct of fair hearings; and the conduct of any other program service for reasons of age, race, color, sex, disability, religious creed, national origin, or political beliefs. Other civil rights requirements include services for individuals with limited English proficiency, disability access, nondiscrimination agreement, public notice requirements, reasonable modifications, and compliance reviews.

During the program design phase, the steering committee would learn about these requirements and formulate a general plan for handling complaints related to civil rights violations. The steering committee would need to pay close attention to current civil rights protections not previously included under NAP civil rights requirements (i.e., religion, political beliefs) and to any expanded protections for discrimination based on sex[22] to inform the development of standard operating procedures to handle civil rights complaints. The steering committee would also need to consider the specific language needs in Puerto Rico and provide meaningful program access to all participants following the bilingual requirements in SNAP regulations (7 CFR 272.4(b)).

SNAP State agencies may develop and use a State agency complaint system. However, many State agencies refer civil right complaints directly to FNS, which is ADSEF's approach under NAP. The SNAP State agency must collaborate with the FNS Civil Rights Division to ensure the plan complies with civil rights regulations.

4. Financial Management and Reporting

SNAP State agencies are required to submit a range of reports to FNS monthly, quarterly, and annually. The steering committee would become familiar with the required data elements to ensure the technical specifications for the data systems include the capability to produce all required information. FNS suggested it could be beneficial for ADSEF to establish relationships with Puerto Rico's WIC and Child Nutrition programs to learn more about FNS financial reporting.

H. Data Systems

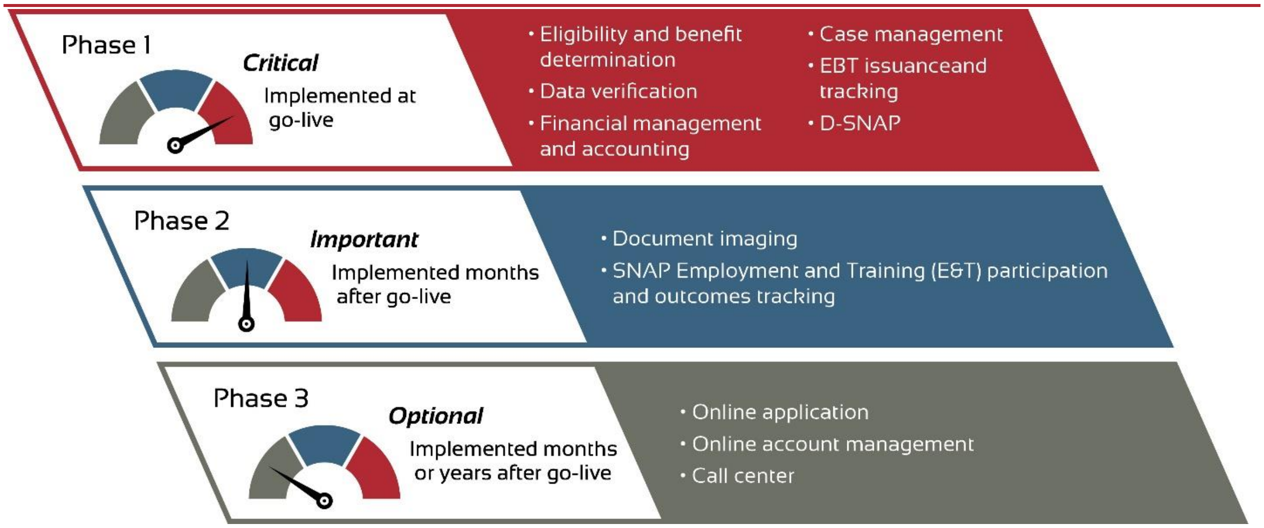
For more information on SNAP data systems, see chapter 14 of the feasibility report.

SNAP data systems need to be designed to comply with all SNAP requirements (e.g., required data matches) and support the policy decisions made by ADSEF's SNAP implementation steering committee. To that end, a full-time data systems team would need to be established. It would be led by the IT project manager, who would bring experience leading the planning, development, testing, and implementation of complex SNAP or other human services data systems at the State agency level. The team would also include a SNAP administration and policy expert with State agency-level experience and knowledge of operations and workflows. The IT project manager and SNAP expert would be part of ADSEF's steering committee. The data systems team would also include seven project coordinators to support different aspects of systems development (e.g., eligibility functions, case management functions).

[22] On June 15, 2020, the U.S. Supreme Court affirmed the prohibition of discrimination based on sexual orientation and gender identity under Title VII of the Civil Rights Act of 1964 protections on sex discrimination (See Bostock v Clayton County, Georgia, 590 U.S., 2020). These protections are also included in the Executive Order on Preventing and Combating Discrimination on the Basis of Gender Identity or Sexual Orientation published on January 20, 2021 (Executive Order No. 13988).

Through their work on the steering committee, the IT project manager and SNAP expert would determine which data systems or functionalities would be necessary for initial SNAP rollout and which could be incorporated later as part of a planned, phased approach. For the purposes of this implementation plan, the study team assumed that at a minimum, the necessary data systems functions would include eligibility determination, case management, data verification, financial management and accounting, EBT issuance and tracking, and D-SNAP eligibility determination. Other data systems functions that could be incorporated either in the initial development process or during a later expansion include document imaging, SNAP E&T participation and outcomes tracking, online application, online accounts management, and call center software. Figure 4.3 illustrates which SNAP data systems might be considered for different phases of such an approach.

Figure 4.3. Potential Phases of Implementation for SNAP Data Systems



Note: D-SNAP = Disaster SNAP, EBT = electronic benefit transfer

These other data systems functions should not be regarded as “extra” or less important. Rather, phasing data systems functionality should correspond with the logical order of implementing SNAP policies and procedures as a whole. During the program design phase, ADSEF would draft a detailed timeline that explicitly identifies which data systems functionality to incorporate in each phase and the rationale behind the decisions. Puerto Rico should also include set times for reexamining the timeline and making needed adjustments, such as every 2 years. This review and revision process would ensure future planning incorporates advancements in technology, continues to align with ADSEF’s goals for SNAP and implementation-related capabilities, and incorporates updated and realistic timelines for future phases.

Because the exact set of functions and systems included in the initial development would be selected by the steering committee during program design, this implementation plan refers to data systems generically. The process would be the same regardless of the selected systems and functions, although more complex systems could extend the length of the implementation timeline. By the end of the program design phase, the data systems team would need to have a preliminary set of business requirements to guide systems development.

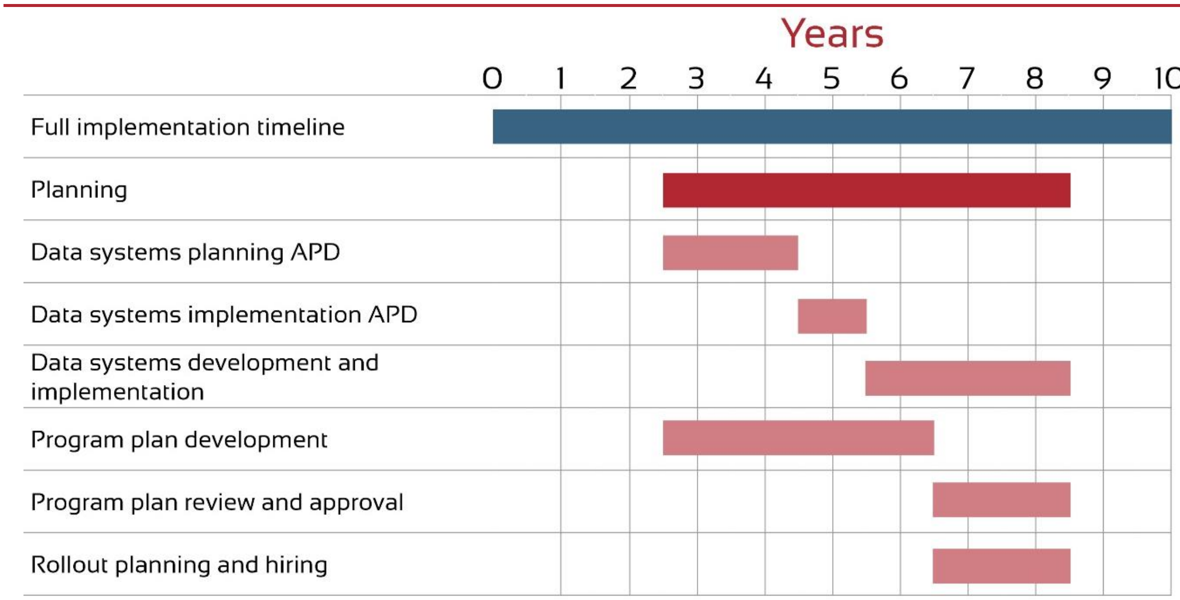
The steering committee would also need to work with the FNS State Systems Office to learn about the Advance Planning Document (APD) process, described in FNS 901 Handbook (USDA FNS, 2020). Through this process, FNS ensures SNAP State agencies meet all requirements for data systems development and receipt of Federal funding for data systems projects. The data systems project manager should begin the APD process near the end of this phase.

Developing SNAP data systems is a complex and challenging process. During the program design phase, the steering committee should consider participating in a State exchange with a State agency that has recently implemented a new system or substantial system updates. This exchange could focus on the APD process, the features and technical specifications of the system, training processes and materials, and challenges and best practices.

Chapter 5. Planning Timeline

After the ADSEF SNAP implementation steering committee uses the program design phase to learn the details of SNAP policy and makes a set of decisions about how SNAP would operate in Puerto Rico, the committee would move into the planning phase. During this phase, the steering committee would draft the components of the State Plan of Operations with technical assistance, review, and approval from FNS; begin the APD process to procure and develop data systems; and plan for hiring and rollout. The FNS task force would coordinate with ADSEF to provide training and technical assistance. The main driver of the timeline for this phase would be the planning and development of data systems through the APD process, which takes State agencies from 4 to more than 10 years to complete. For the purpose of this timeline, the process was estimated to take 6 years.

Figure 5.1. Planning Timeline



Note: APD = Advance Planning Document

During the planning phase, the IT project manager would oversee the APD process and the procurement and development of data systems.

Concurrent with the planning and development of data systems, the SNAP implementation steering committee would need to develop initial drafts of many of the components of the State Plan of Operations. The State Plan of Operations is a series of documents describing the key features of SNAP administration; many of these components are described in the relevant topic areas in this chapter. ADSEF's goal should be to have initial drafts of these documents by the end of the fourth year of this phase. The steering committee would receive feedback from FNS on the initial drafts of the plans, revise the plans, and resubmit them to FNS for approval. ADSEF's goal should be to have preliminary approval of the complete State Plan of Operations at the conclusion of the planning phase. The plan must be submitted to FNS for review and approval annually. The steering committee would need to review the

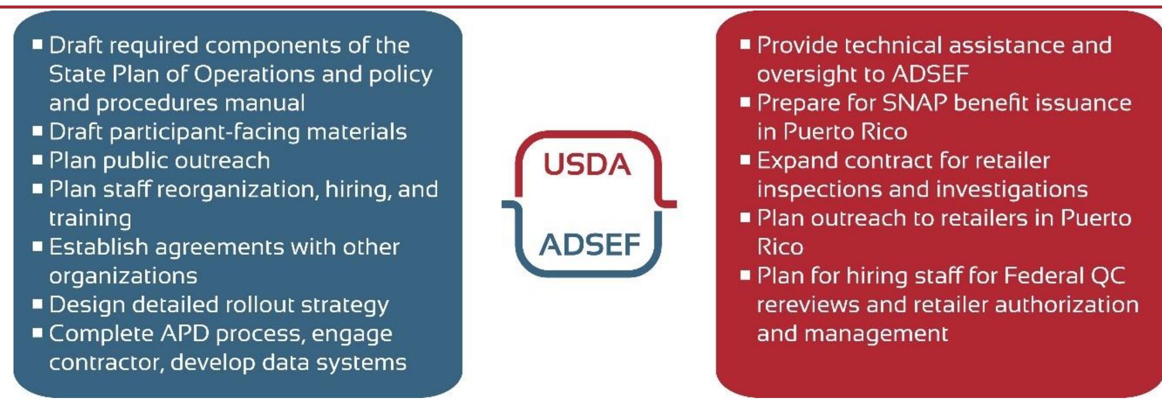
State Plan of Operations Guide written by FNS for each fiscal year and make updates to the plan accordingly.[23]

During the planning phase, the steering committee would need to identify staff for several future key SNAP roles, including a SNAP certification policy director, a SNAP QC statistician, a SNAP E&T director, and a full-time SNAP-Ed nutritionist. These individuals could be original members of the steering committee, consultants, or other ADSEF staff.

During the fifth and sixth years of the planning phase, the SNAP implementation steering committee would need to develop detailed plans for rolling out SNAP. This would include identifying a location for the initial pilot rollout and a schedule for expanding SNAP to additional locations. The steering committee would also need to create a plan for recruitment and onboarding of new staff needed to administer SNAP. This plan would include labor categories and job descriptions for new positions, a timeline that is consistent with the hiring processes of the Puerto Rico Government, and procurement of materials needed to support these new employees. Given the quantity of hiring ADSEF would need to do, it would likely need to begin the process before the end of the planning phase.

Throughout this phase, FNS would provide technical assistance and support to ADSEF as ADSEF drafts plans and procures and develops data systems. FNS would also need a detailed plan by the end of the planning phase for hiring any additional staff and may begin taking initial steps in the process, along with a plan for authorizing and overseeing retailers in Puerto Rico. Figure 5.2 provides an overview of the key features of the planning phase.

Figure 5.2. Key Features of the Planning Phase



Note: ADSEF = Administración de Desarrollo Socioeconómico de la Familia (Administration for the Socioeconomic Development of the Family); APD = Advance Planning Document; QC = Quality Control

The remainder of this chapter provides more detail on tasks to be performed by ADSEF and FNS during the planning phase, organized by SNAP substantive area.

A. Certification and Benefit Issuance

During this phase, ADSEF's SNAP implementation steering committee and SNAP policy director would need to make more detailed plans for certifying participants and issuing benefits.

[23] FNS requires that States include a description of their agreement with the Social Security Administration for joint processing in the State Plan of Operations. Puerto Rico does not have Supplemental Security Income (SSI) as of 2022. If Puerto Rico were to implement SSI, ADSEF would need to develop such an agreement with the Social Security Administration and incorporate it into the State Plan of Operations.

1. Draft Participant-Facing Materials

ADSEF would need to draft a range of participant-facing materials. These materials include the SNAP application; other forms participants may need to complete, such as change reporting forms and periodic reports; and participant notices. All participant-facing materials must include certain civil rights statements and other federally required language. Initial drafts would need to be tested with potential SNAP participants and adjusted accordingly. Revised drafts should be submitted for review and comment by MARO's Operations Division and the FNS Civil Rights Division by the end of the fourth year of this phase; the materials would need to be approved and finalized by the end of the planning phase.

2. Draft Policy and Procedures Manual

ADSEF would also need to draft a policy and procedures manual. SNAP regulations (7 CFR 272.3(a)) require that manuals include policies and procedures for the certification of households; issuance, accountability, and reconciliation; the performance reporting system, including QC and management evaluations; training procedures; and fraud and fair hearing procedures. As with the participant-facing materials, an initial draft would need to be completed by the end of the fourth year of the planning phase to allow time for review and comment by MARO's Operations Division; the manual would need to be approved and finalized by the end of the planning phase.

3. Obtain Access to Sources for Data Matches

ADSEF would need to continue the process of obtaining access to various required and optional databases, with the goal of obtaining access by the end of the planning phase. Although the steering committee would lead this effort, ADSEF's Office of Legal Affairs would be involved in establishing the required memoranda of understanding or data matching agreements.

4. Determine Standard Utility Allowances

During this phase, if ADSEF opts to use standard utility allowances, it would need to obtain and analyze data on typical utility expenditures in Puerto Rico to calculate the value of the standard utility allowances. If the use of a standard utility allowance is mandatory, ADSEF must have at least one that includes heating or cooling costs and one that does not include heating or cooling costs. The average cost of local areas would need to be considered, and ADSEF would have to determine if it would average standard utility allowances across Puerto Rico or by region.[24] The standard utility allowances would need to be calculated by the end of the fourth year of the planning phase for review and approval by MARO's Operations Division; the standard utility allowances would need to be finalized by the end of the planning phase.

5. Request Waivers and Demonstration Projects

ADSEF would complete and submit most waiver and demonstration project requests by the fourth year of this phase. This would allow time for the FNS Certification Policy Branch and Program Design Branch to ask and receive answers for any clarifying questions and approve or deny the waivers by the end of the planning phase. Some waivers would need to be submitted closer to rollout and therefore could not be submitted at this time. ADSEF could ask FNS for technical assistance in developing those types of waiver requests to ensure ADSEF is prepared to submit such requests properly at the appropriate time.

[24] Only a few States' standard utility allowances vary by household size, and only two States vary based on location within the State.

6. Modify TANF Materials to Allow BBCE Rules

If ADSEF elects to use BBCE rules for eligibility, it may need to make some changes to its TANF materials. SNAP State agencies typically use TANF or Maintenance of Effort funds to produce a brochure or pamphlet that is widely accessible or add a referral to their application to ensure all households are eligible. With guidance from MARO and examples from other SNAP State agencies, ADSEF would add this type of material to its TANF program.

7. Prepare to Issue Benefits

The steering committee would need to take several steps to prepare to issue benefits. First, it would need to determine if the scope and duration of NAP benefit issuance contract could or should be transitioned to provide SNAP issuance and transaction services. The committee would then need to modify the contract with the NAP EBT processor for SNAP or conduct a procurement for a full-service EBT processor. The EBT processor would need to obtain new EBT cards for SNAP; ideally, the images and logos on these cards would be consistent with the messaging developed for the participant communications campaign. Initial rollout would involve special procedures for distributing more than 860,000 EBT cards to households during a 6-month window across Puerto Rico.

The steering committee would then need to develop procedures for issuing benefits to newly participating households once their application has been approved; these procedures need to account for requirements that the benefits must be issued by a staff member who was not involved in the eligibility determination process. The steering committee would also need to develop procedures for monthly issuances, including a benefit issuance schedule; this schedule could be similar to the process for NAP, in which benefit issuances are spread across the month based on the last digit of participants' social security number. The steering committee would also need to develop processes for reconciling benefit issuances and redemptions.

At the same time, the steering committee would need to work with ADSEF's EBT processor and FNS to plan for SNAP letters of credit and access to Federal financial systems. Under SNAP, ADSEF would access administrative funds using the Automated System for Award Payments (ASAP), the Federal system that runs letters of credit, as it does for NAP. FNS would need to establish additional letters of credit for 100 percent SNAP E&T funds, 50/50 SNAP E&T funds, SNAP-Ed, and other types of funding. ADSEF would need to gain access to the Account Management Agent (AMA), the Federal Reserve Bank system that coordinates among the Federal reserve bank, the EBT processors, and ASAP for SNAP benefit issuance. Large EBT processors are familiar with AMA and working with the Federal Reserve. If ADSEF works with one of those processors, the processor would be able to lead this process. Otherwise, the steering committee and EBT processor might need to request technical assistance to establish the appropriate access to AMA. Access would need to be established by the end of the planning phase.

8. Estimate SNAP Participation

The estimate of the number of individuals and households that would participate in SNAP in Puerto Rico in this implementation plan is based on data from 2019. Given the length of the implementation process, ADSEF should plan to calculate new participation estimates midway through the planning phase. These estimates would inform the number of staff ADSEF would need to hire, particularly eligibility workers and supervisors, and decisions about whether ADSEF needs additional office space to administer SNAP and the number of EBT cards and other materials ADSEF would need to purchase for applicants and participants.

ADSEF would work with Administrative Services within General Services Administration during this phase to determine whether additional regional or local office space would be needed to accommodate the changes. Administrative Services would conduct a needs assessment of existing office space and, if needed, develop a plan to identify, acquire, and open additional space, including contracting for professional services to help identify the space. Once identified, Administrative Services would oversee the process, including departmental approvals, building acquisition, hiring and overseeing contractors to prepare new office space, and ordering equipment and materials for opening the space. Because this process would take 12–18 months, ADSEF should begin working with Administrative Services at least 2 years prior to the end of the planning phase.

This estimate of SNAP participation could include comparison of the characteristics of the Puerto Rico population and NAP participants to the parameters for SNAP administration. Prior work has indicated some subpopulations of NAP participants (e.g., older adults, postsecondary students) may lose eligibility or see reduced benefit levels under NAP (Center on Budget and Policy Priorities, 2020a; 2020b), but the extent of the differences in eligibility and benefit levels would depend on factors that could vary based on the authorizing legislation and the policy options ADSEF selects. Examining the effects of SNAP implementation on these subpopulations will help ADSEF identify participants at risk of losing nutrition assistance, prepare to communicate these changes to those participants, and potentially consider ways to direct those participants to alternate sources of nutrition assistance.

9. Plan Staff Recruitment

The differences in SNAP and NAP eligibility criteria are likely to result in more participants in SNAP than NAP; see chapter 7 for more information. To handle the increased caseload, ADSEF would need to hire additional eligibility workers and supervisors. Staffing needs would depend on the service delivery model and final set of policy options ADSEF selects. If ADSEF needs to hire, recruiting and staffing plans should be in place by the end of the planning phase. This would include identifying the number, qualifications, and responsibilities of each position and determining when recruitment would need to begin for new hires to be in place on time. The steering committee would also need to determine the supplies and equipment needed to support new hires and develop a procurement plan for those materials. The recruiting and procurement processes would need to start before the end of the planning phase.

10. Engage Contractor to Train Staff

Virtually all ADSEF staff would need to be trained in SNAP policies and procedures and the data systems developed to support that work. Some aspects of training could be handled by ADSEF and MARO staff, but ADSEF should consider engaging a contractor to conduct training on eligibility determination and benefit issuance processes; using the new data systems would be a key component of this training. Eligibility determination and benefit issuance training would need to be provided to almost all SNAP staff across Puerto Rico, including 1,500 eligibility workers and over 200 eligibility supervisors. Any contracts needed for training would need to be in place by the end of the planning phase so the contractor, ADSEF, and FNS could begin developing materials and planning training at the beginning of the testing, training, and rollout phase.

11. Plan SNAP Rollout

This implementation plan assumes a staggered SNAP rollout. During the planning phase, the steering committee would need to develop a detailed plan for how the rollout would occur. This plan would need to identify the geographic area(s) targeted for the initial rollout and describe the strategy and timeline for expanding SNAP from that original group. The plan would need to incorporate an iterative process for identifying and addressing problems encountered during the rollout and a strategy for evaluating the success of the rollout. The plan would also need to describe key roles and staffing during the rollout; in particular, the plan should include any strategies for bringing in additional staff to assist during the initial push for each stage of the rollout.

This staggered rollout strategy is important to meet the SNAP requirement for a live data systems pilot. However, it does present challenges, in that households with similar characteristics in different geographic areas could receive different benefit levels, potentially leading to disparate impact. FNS and ADSEF would need to ensure the rollout would not lead to disparate impact or identify strategies for remediating disparate impact.[25]

The steering committee would also need to seek partners within the community that could provide support during the rollout. For example, community-based or nonprofit organizations could help with outreach to current participants and provide additional support to community members as they apply for SNAP.

B. Program Integrity

The steering committee would develop detailed plans for SNAP QC, participant fraud prevention and investigation, and management evaluations during the planning phase. FNS would need to develop plans for its portion of the QC review process.

1. SNAP QC

During the planning phase, ADSEF's SNAP implementation steering committee would need to engage the services of a statistician, either as a contractor or as a permanent hire. The steering committee would also need to identify a QC director. By the end of the fourth year of this phase, the statistician would complete an initial draft of the QC sampling plan, which would describe procedures for producing sampling frames for active and negative cases, and the QC director would complete an initial draft of the QC policies and procedures manual. MARO's Integrity Branch and the National Office Quality Control Branch would provide technical assistance throughout the process of developing these plans and would need to review and approve both plans by the end of the planning phase.

Although ADSEF has staff who conduct reviews of NAP cases (Medición de Esfuerzo y Resultados, Measurement of Efforts and Results [MER]), the agency may need additional staff in place to operate SNAP QC. By the end of the planning phase, ADSEF would need to have a hiring plan in place that includes the number of positions required and the qualifications and responsibilities of each position required.

MARO's Integrity Branch would be responsible for conducting re-reviews (i.e., a second review) of a subset of Puerto Rico's QC cases. To effectively re-review casefiles from Puerto Rico, the branch would need at least two bilingual Federal QC reviewers who could review Spanish-language casefiles and provide review results to ADSEF in Spanish. To fill this need, MARO would need to hire additional Federal QC reviewers, preferably with experience with SNAP QC at the State agency or Federal level. These reviewers would need to be in place by the end of the planning phase.

[25] For example, FNS and ADSEF could consider issuing supplemental benefits in areas that become eligible to apply for SNAP later during the rollout. These supplemental benefits would make up the difference between the nutrition assistance benefits households in these areas did receive and what they would have received had they lived in the first area in Puerto Rico to become eligible to apply for SNAP.

Although ADSEF's MER process is similar, SNAP QC would be new to ADSEF employees. MARO's Program Integrity Branch and the National Office's SNAP QC Branch would need to provide training to ADSEF's QC reviewers. To prepare for this effort, both groups would need to become deeply familiar with the SNAP policy materials developed during the planning phase (e.g., application, policy and procedures manual, participant notices).

The FNS QC Branch would also need to prepare to receive SNAP QC data from Puerto Rico. This would require adding Puerto Rico to the Regional Office QC Tracking System, which receives the data State agencies enter into the SNAP QC System. The QC Branch would need to incorporate Puerto Rico into the annual payment error rates, case and procedural error rates, and timeliness rates the branch calculates and add data from Puerto Rico to the QC Database produced for public use. FNS would also need to incorporate Puerto Rico's QC data into any reports or dashboards produced by the Mission Data Platform, a platform used for SNAP data analytics.

2. Participant Fraud Prevention and Investigation

During the first 4 years of this phase, the steering committee would develop the fraud management system by establishing a dedicated fraud hotline, developing plans and procedures for identifying participants for investigation and conducting those investigations, developing plans for hearings and for cases referred for prosecution, and establishing procedures for recouping excess benefits and returning those funds to the U.S. Treasury. ADSEF would also need to draft a claims management plan as a component of the State Plan of Operations.[26] By the end of the fourth year of the planning phase, ADSEF should have an agreement in place with the Department of Justice related to the referral of participants found to have committed intentional program violations for additional investigation and prosecution. At the same time, ADSEF should submit the draft claims management plan to MARO for review; the plan should be finalized and approved by the end of the planning phase.

To meet SNAP requirements for participant fraud investigation and prevention, ADSEF may need to hire additional staff to conduct investigations, and the Department of the Family may need to hire additional staff for hearings. By the end of the planning phase, ADSEF and the Department of the Family would need to have a hiring plan in place that details the number of positions they need to fill to prevent and investigate participant fraud and the qualifications and responsibilities of those positions.

MARO's Integrity Branch would need to review and approve ADSEF's plans for participant fraud investigation and prevention by the end of the planning phase.

3. Management Evaluations

ADSEF would need to develop plans for conducting State management evaluations. SNAP regulations require State agencies to review large project areas every year, medium project areas every 2 years, and small project areas every 3 years; if ADSEF were to define project areas at the current regional office level, it would need to conduct 10 management evaluations annually. Although FNS specifies certain target topics each year, SNAP State agencies have flexibility to identify other topics for review. The steering committee and SNAP policy director would need to identify standard topics, develop standard forms to be used for these evaluations, and establish a schedule for routine evaluations for each project area. MARO's Integrity Branch would need to review and approve these plans. If ADSEF needs to add

[26] To set a different threshold than the required $125 to establish claims, ADSEF would need to submit a cost-effectiveness plan as part of this claims management plan.

staff to conduct State management evaluations, it should develop a hiring plan by the end of the planning phase.

MARO would also need to prepare to conduct management evaluations. MARO already conducts management evaluations of NAP but may need to update materials to incorporate Puerto Rico into SNAP management evaluations.

C. Retailer Authorization and Management

Two groups within FNS conduct much of the work related to retailers: RIPID manages policies associated with retailer management and conducts administrative review of retailer appeals, and ROC authorizes and manages retailers.

Retailers applying for SNAP authorization are required to submit several types of documentation. During the planning phase, RIPID or ROC would work with ADSEF's OIC to determine the precise documents issued in Puerto Rico that retailers would need to submit. At a minimum, these documents would have different names from those retailers in the States submit because the documents in Puerto Rico are in Spanish; the purpose of this document review would be to provide clarity to retailers about what to include in their SNAP application.

During this phase, ROC and RIPID would need to prepare to authorize and manage retailers in Puerto Rico:

- RIPID would need to ensure that all retailer-facing materials, including the online application, training videos, and communications automatically produced by the Store Tracking and Redemption System (STARS) are available in Spanish. These materials would need to be ready by the end of the planning phase.
- RIPID would need to evaluate the extent to which its staff, especially administrative review officers, have the capacity to communicate with retailers in Spanish. ROC would also need to evaluate staffing levels to determine if it has adequate staff to process applications from Puerto Rico's retailers. Based on the number of authorized NAP retailers in 2021, ROC would need to hire nine additional staff members (three each to authorize retailers, review allegations of program violations, and handle administrative actions as a result of violations), and RIPID would need to hire two additional bilingual administrative review officers. RIPID and ROC would need to develop plans to recruit, hire, and train staff before they begin working with retailers in Puerto Rico.
- ROC would need to expand its contract for retailer inspections and investigations to include Puerto Rico. This could be accomplished by including the additional scope of work in the contract whenever the contract is recompeted during this phase.
- RIPID would need to update several systems to include Puerto Rico: SNAP Antifraud Locator EBT Retailer Transactions (known as ALERT); STARS; Send Word Now, which automates notices to vendors; and MoveIt, the system the store inspection and investigation contractor uses to share files with FNS.
- RIPID would need to develop criteria for identifying high-risk vendors in Puerto Rico.
- ROC would need to conduct outreach to retailers in Puerto Rico with input from RIPID. To ensure consistent messaging to all stakeholders in Puerto Rico, ROC could consider working with

ADSEF to jointly engage a communications campaign contractor; see section G for additional information on the communications campaign.

- RIPID and ROC would need to develop a timeline for receiving and processing retailer applications to ensure an adequate number of retailers are authorized at the beginning of the SNAP rollout for participants to redeem benefits. ROC may wish to consider prioritizing applications from retailers in the geographic area of the initial rollout.

ADSEF's OIC and División de Integridad Programática (DIP; Programmatic Integrity Division), which are responsible for NAP retailer authorization and management, would provide support to RIPID and ROC. This support would entail providing information on NAP retailer authorization practices and documents, data on past investigations and findings, and general information about the retail environment in Puerto Rico. ADSEF has a small number of permanent staff dedicated to retailer authorization and management. Because permanent staff are guaranteed continued employment with the government, ADSEF would work with the Government of Puerto Rico Human Resources Administration and Transformation Office during this phase to identify appropriate transfers. As many other groups within ADSEF are likely to need additional staff, these staff members could possibly be transferred to new roles within ADSEF. Because stores are likely to accept both SNAP and NAP benefits for a time, these employees should not transfer into new roles until NAP benefit redemptions cease and all investigations have been completed.

D. Work Requirements and SNAP E&T

During the planning phase, ADSEF's SNAP implementation steering committee and its SNAP E&T director would need to draft the Plan for Disqualification for Failure to Meet Work Requirements and the SNAP E&T State Plan. The initial draft of these plans would need to be submitted to MARO's Operations Branch and the National Office's Office of Employment and Training (OET) by the end of the fourth year of the planning phase. ADSEF would need to address MARO's and OET's concerns to obtain approval from OET by the end of the planning phase.

Other components of this phase for work requirements and SNAP E&T include the following:

- ADSEF would need to establish a process for each SNAP household member subject to the general work requirements to register for work or be registered for work by ADSEF. This plan and any associated agreements and policy and procedure documents would need to be in place by the end of the fourth year of the planning phase.
- If ADSEF opts to request a waiver of the ABAWD time limit, ADSEF would need to obtain data on economic conditions within Puerto Rico—or certain geographic areas of Puerto Rico—from the Departamento del Trabajo y Recursos Humanos (Department of Labor and Human Resources) and other agencies. ADSEF could request technical assistance from FNS in developing the waiver request to ensure ADSEF is prepared to submit the request properly at the appropriate time. ADSEF would submit its waiver request at least 6 months before the requested waiver implementation date.
- If ADSEF opts to contract SNAP E&T service provision, the SNAP E&T director would need to establish contracts with those providers by the end of the planning phase.
- The SNAP E&T director would work with ADSEF's División de Finanzas (Finance Division) and División de Presupuesto (Budget Division) to develop plans for tracking SNAP E&T costs, identifying allowable costs, providing participant reimbursements to SNAP E&T participants for allowable expenses, and requesting reimbursements from FNS.

E. Disaster Response

ADSEF's steering committee would develop the D-SNAP plan as follows:

- Identify roles and responsibilities of key staff in the event of a disaster.
- Develop a resource plan describing staffing, the systems necessary for use in a D-SNAP (i.e., EBT system, application system), EBT cardstock and other supplies, application sites, and data needed for a D-SNAP request.
- Create an implementation plan, including an outreach plan to the public and retailers, client materials, certification and issuance processes, a fraud prevention plan, and procedures for daily and postdisaster reporting.

To effectively develop this plan, the steering committee would need to form relationships with other disaster response organizations in Puerto Rico; plans for collaborating with these groups would be included in the D-SNAP plan. ADSEF would submit an initial draft of the D-SNAP plan to MARO's Operations Branch and the National Office's Certification Policy Branch for review by the end of the fourth year of the planning phase. ADSEF's D-SNAP plan should be approved and final by the end of the planning phase of the implementation process.

Throughout the planning phase, MARO's Operations Branch and the National Office's Certification Policy Branch would provide technical assistance to ADSEF.

F. SNAP-Ed

In the planning phase, ADSEF's steering committee and nutritionist would develop a preliminary SNAP-Ed State plan that describes the nutrition, physical activity, and obesity prevention needs of the SNAP-eligible population in Puerto Rico; related goals and objectives; and planned projects (i.e., interventions and activities) designed to meet the goals, objectives, and target audience needs. The described approaches must include evidence-based individual or group direct nutrition education, health promotion, and intervention strategies. They must also include comprehensive multilevel interventions and/or community and public health approaches (e.g., social marketing campaigns; policy, systems, and environmental change initiatives). The plan would also describe how ADSEF would coordinate with other agencies and organizations and evaluate project effectiveness. This preliminary SNAP-Ed State plan would be updated in the calendar year when SNAP-Ed funding would begin.

The SNAP-Ed plan would include an annual budget informed by preliminary and ongoing allocation discussions with MARO's Operations Branch and the National Office's State Administration Branch. ADSEF's estimated allocation would be published in the spring preceding the first year SNAP-Ed is offered. ADSEF would submit an initial draft of the SNAP-Ed plan to MARO's Operations Branch and the National Office's State Administration Branch for review by the end of the fourth year of the planning phase, with approved and final drafts due by the end of the phase. The final SNAP-Ed allocation would be set concurrent with the review and approval of the plan.

Most SNAP State agencies partner with other organizations for local implementation of SNAP-Ed projects. Some State agencies also implement statewide activities directly. During the planning phase, ADSEF would need to identify the implementing agency or agencies, establish formal partnerships, and develop a process to grant awards to the implementing agencies. ADSEF's nutritionist and two home economists deliver nutrition education for NAP. ADSEF might need to modify the roles of these staff members after SNAP has been implemented or identify new roles for them within ADSEF or elsewhere in the government. For example, to ensure strong program development and implementation, ADSEF would need a full-time nutritionist to oversee SNAP-Ed; ADSEF's current full-time nutritionist could likely fill this role. ADSEF would still need to provide State agency-level oversight and administration even if implementing agencies are responsible for local delivery of all SNAP-Ed activities (e.g., coordinate a statewide needs assessment, develop the overall State plan, monitor implementing agencies, prepare the annual report); ADSEF Nutrition Education Program staff could likely support some or all of these activities.

During the planning phase, the steering committee, nutritionist, SNAP policy director, and applicable implementing agencies would also decide what, if any, SNAP-Ed materials or referrals would be integrated into the certification process or made available through local offices.

G. Program Administration

Midway through the planning phase, the steering committee would need to engage offices within ADSEF to plan for a variety of SNAP administrative functions, including outreach and communications, fair hearings, civil rights, and financial management and reporting. While many SNAP administrative functions are similar to those for NAP, careful attention needs to be paid to ensuring compliance with all Federal regulations and guidelines in these program areas.

1. Outreach and Communications

Through SNAP Outreach, State agencies have the option to conduct outreach to educate low-income families about the program. However, allowable expenditures have strict limitations. For example, television, radio, and billboard advertisements to promote SNAP are not allowable SNAP Outreach expenses. If ADSEF opts to engage in SNAP Outreach, the steering committee would collaborate with the ADSEF Community Relations Office and other stakeholders to draft a SNAP State Outreach Plan to guide all outreach activities, including outreach to individuals with disabilities. Outreach activities should align with SNAP regulations and guidance and be responsive to the linguistic needs of potential SNAP participants in the project areas, such as individuals with limited Spanish or English proficiency. ADSEF should submit the plan to MARO for approval at least several months prior to any planned outreach activities.

Regardless of ADSEF's decision about SNAP Outreach, it would be particularly important for ADSEF to conduct a comprehensive public communications campaign prior to SNAP implementation to inform potential SNAP participants about the transition from NAP to SNAP. This campaign could include information on SNAP application processes, eligibility requirements, and benefit levels. Community stakeholders and participants should be involved in communications campaign planning and implementation, including formative assessment and dissemination. During the fifth year of the planning phase, ADSEF's Community Relations Office should seek a contract with a firm that can conduct a formative assessment, plan a communications campaign, and develop and disseminate communications materials.

By the beginning of the sixth year of the planning phase, ADSEF's Community Relations Office should have a contract in place to plan and conduct the SNAP implementation communications campaign. During this year, ADSEF and its communications contractor would conduct a formative assessment and plan for the communications campaign. This formative assessment would include basic research, such as environmental scans and interviews with key informants (e.g., target audience members, media partners, experts), to answer the following questions:

- Who are the primary and secondary target audiences for the communications campaign? Current NAP participants? Low-income nonparticipants? Partner organizations, such as community-based organizations and nonprofit organizations? Employers?
- What messages have successfully reached these audiences previously? What messages have been less successful?
- Which media are most effective for reaching these audiences?
- Which organizations or programs currently work with these populations, and how would SNAP interact with their current activities?

ADSEF and its communications contractor would use the results of the formative assessment to develop materials and a robust dissemination plan. Assuming a geographically staggered SNAP rollout, this plan would begin with a limited campaign throughout Puerto Rico about 3 months before the initial SNAP rollout begins, with more intense, geographically targeted campaign activities immediately preceding SNAP rollout. The dissemination plan should incorporate sufficient time for all messages and materials to obtain necessary approvals to meet deadlines for dissemination. The dissemination plan should also take into consideration the amount of lead time various media outlets would need to plan for placement of the materials.

The dissemination plan should include a strategy for evaluating the communications materials. Throughout the campaign, ADSEF and its communications contractor would need to collect data on audience reception and the effectiveness of the messaging. The results of this evaluation could be used to make incremental changes during the rollout campaign and inform ongoing communications about SNAP.

In addition to the general communications plan, ADSEF could consider more targeted communications with specific subgroups of NAP participants who may be ineligible for SNAP or who may see reduced benefit levels under SNAP. Although ADSEF could not definitively make an eligibility determination or benefit calculation for a given household at this point in the implementation process, alerting these subgroups to the pending changes in eligibility rules and benefit calculations could provide them needed time to identify alternate sources of nutrition assistance or other support.

2. Fair Hearings

During the planning phase, the ADSEF steering committee would engage with the Junta Adjudicativa del Departamento de la Familia (Adjudicative Board of the Department of the Family), which conducts fair hearings for NAP. The ADSEF steering committee would provide guidance to the Adjudicative Board regarding SNAP requirements, including any major differences in how SNAP fair hearings are conducted. To the extent possible, the Adjudicative Board may consider changing NAP procedures to reflect SNAP procedures (e.g., aligning the timeframes for scheduling and conducting hearings) to ease the transition during the SNAP rollout. ADSEF would also need to provide the Adjudicative Board with all Federal and local regulations related to SNAP policy to prepare the Adjudicative Board for conducting SNAP administrative hearings.

Since the Adjudicative Board is within the Department of the Family (i.e., it is responsible for hearings on ADSEF programs and programs operated by other agencies in the department), ADSEF would not have full control over fair hearings processes or procedures. ADSEF would need to work with the Adjudicative

Board to design and implement a strategy for tracking outcomes of appeals, as required for reporting on FNS form 366-B.

ADSEF would need to collaborate closely with the Adjudicative Board in the lead-up to the testing and rollout phase, during which both NAP and SNAP would be active for a short time as SNAP is phased in. During that time, and for some time after, the Adjudicative Board would be hearing both NAP and SNAP cases. ADSEF and the Adjudicative Board may need to dedicate more staffing resources to fair hearings initially and over time. SNAP rollout would require eligibility and benefit determinations for approximately 861,000 households, and former NAP participants denied SNAP eligibility may appeal the decision; NAP participants' lack of familiarity with SNAP could also result in a relatively high number of appeals. Over the long term, cases would level off, but the Adjudicative Board should expect more cases than with NAP as a result of the increased caseload. By the end of the planning phase, the Department of the Family and the Adjudicative Board would need to have a hiring plan in place that includes the number of positions required and the qualifications and responsibilities of each.

3. Civil Rights

During the planning phase, the ADSEF steering committee would guide development of a system for ensuring civil rights protections and handling complaints in compliance with USDA Departmental Regulations and FNS Instruction 113-1, Civil Rights Compliance and Enforcement—Nutrition Programs and Activities (USDA FNS, 2005). ADSEF would be responsible for developing and implementing a plan that accomplishes the following:

- Creating a public notification system to inform individuals of the program, their rights and responsibilities under the program, the policy of nondiscrimination, and procedures for filing a civil rights complaint
- Posting an approved nondiscrimination statement on all publicly disseminated outreach and education materials and local offices, including contact information for lodging a discrimination complaint
- Displaying the nondiscrimination poster provided by FNS in all offices involved in administering the program that serve the public
- Drafting a written assurance to accompany all SNAP applications indicating recipients have received notification of nondiscrimination
- Training ADSEF staff on the civil rights related laws, regulations, procedures, and directives
- Ensuring individuals with limited English proficiency have meaningful access to the information and services provided by ADSEF[27]
- Collecting and reporting racial and ethnic data in accordance with FNS policy
- Conducting civil rights compliance reviews to ensure adherence within local agencies

ADSEF would also need to describe a system for processing civil rights complaints in the State Plan of Operations, which would need to be reviewed by the FNS Civil Rights Division before implementation. ADSEF could choose to handle civil rights complaints or refer participants to FNS.MARO receives civil

[27] This includes developing a plan that considers (1) the number or proportion of persons with limited English proficiency who are eligible to be served or likely to be encountered by the program or grantee; (2) the frequency of individuals with limited English proficiency coming in contact with the program; (3) the nature and importance of the program, activity, or service provided by the program to people's lives; and (4) the resources available to the grantee/recipient and costs. The plan would need to be responsive to the linguistic context of Puerto Rico to also address the needs of those with limited Spanish proficiency.

rights complaints for NAP. If ADSEF chooses to process civil rights complaints, it would need to develop a tracking system and hire and train civil rights specialists to review complaints and determine the appropriate course of action. The processing system must include acknowledgment of the complaint, referral to MARO (as appropriate), gathering and investigation of facts, drafting of a decision letter that includes appeal rights, submission of a report to MARO, and implementation of corrective actions when necessary. The system would be developed and plans for hiring would be completed prior to the end of the planning phase. Alternately, ADSEF could provide a link to USDA's Program Discrimination Complaint Form (USDA FNS, 2012) and contact information for the FNS Civil Rights Division. Applicants and participants would then lodge their complaints directly with USDA.

FNS Civil Rights Division would provide technical assistance to ADSEF during the planning phase to ensure adherence to civil rights requirements, whether ADSEF chooses to handle civil rights complaints or refer complainants directly to FNS. The FNS Civil Rights Division must review and approve the complaint process prior to implementation. Prior to the end of the planning phase, MARO (in consultation with the Civil Rights Division) would conduct the Preapproval/Preaward Compliance Review to ensure ADSEF's compliance with civil rights requirements prior to approval for Federal financial assistance.

4. Financial Management and Reporting

For financial management and reporting, the steering committee would engage with ADSEF's Oficina de la Administradora Auxiliar de Finanzas y Presupuesto (Office of the Assisting Administrator for Finance and Budget) during the planning phase. While many of the required reports are similar for NAP and SNAP, SNAP reports typically require a greater level of detail, including reporting for SNAP E&T, intentional program violation and fraud investigations, fair hearings, QC, and automated data processing (ADP). SNAP also requires more reports to be submitted annually than NAP. The Office of the Assisting Administrator for Finance and Budget would conduct a gap analysis to compare information recorded in the Puerto Rico Income Financial Accounting System (PRIFAS) with the required SNAP report elements. The Office of the Assisting Administrator for Finance and Budget would work to incorporate updates to PRIFAS by the end of the planning phase.

The Office of the Assisting Administrator for Finance and Budget would need to prepare a budget for annual SNAP administration as part of the State Plan of Operations. This would require collaboration with each programmatic area to accurately reflect the anticipated costs of SNAP operations.

Staff working on NAP within the Office of the Assisting Administrator for Finance and Budget would transition to SNAP during the testing, training, and rollout phase. During the planning phase, the office should consider the increased workload associated with the additional SNAP reports and create a hiring plan to fill any gaps. This hiring plan should also consider the workload associated with operating NAP and SNAP in parallel during the rollout and the work associated with closing out NAP after SNAP is operating throughout Puerto Rico.

ADSEF submits NAP reports through the Food Programs Reporting System (FPRS), an online application requiring a Level 2 eAuthorization and accessed using login credentials or a personal identity verification card. During the planning phase, the FNS Financial Management Office would work with ADSEF to update Level 2 access to FPRS to ensure the correct reports are submitted. FNS may also provide technical assistance to ADSEF to ensure reports are completed correctly and on time.

FNS would also need to prepare to receive SNAP reports from Puerto Rico. Data from the standard reports submitted by State agencies are compiled into the National Data Bank and used to produce a wide range of standard reports. The National Data Bank would need to be updated to accommodate Puerto Rico's data, as would each of the standard reports; this would include the dashboards produced by the Mission Data Platform.

H. Data Systems

FNS requires SNAP State agencies to complete an APD process for all SNAP data systems development projects with a cost greater than $6,000,000; Puerto Rico's project would require an APD process. The APD process outlines all steps of a SNAP data systems project: initial planning, request for proposal (RFP) drafting and procurement, system development, testing, and implementation. An annual APD update is required for any planning or implementation activities taking more than 1 year. SNAP State agencies are required to complete all steps of the APD process and receive approval from MARO and the State Systems Office to move forward. FNS has 60 days to review documents (e.g., APDs, RFPs, contracts) and suggests States and territories plan for at least two rounds of review. The APD process often experiences delays if documents are not submitted correctly or require additional rounds of review.

This process for SNAP data systems development has two distinct phases: Planning APD (PAPD) and Implementation APD (IAPD). Under the leadership of the IT project manager, ADSEF's SNAP implementation steering committee should begin the APD process toward the end of the program design phase, with the bulk of the process occurring during the planning phase. Throughout the planning phase, the State Systems Office and MARO would provide extensive technical assistance to ADSEF.

The duration estimates presented in this section reflect guidance presented in the FNS Handbook 901 (USDA FNS, 2020) and best practices described by FNS stakeholders and other SMEs. These stakeholders encouraged ADSEF to carefully plan for data systems development processes to ensure they are thorough and accurate. Errors with SNAP data systems have resulted in State agencies being unable to issue benefits to eligible households for a period of time, which would be a substantial risk in Puerto Rico, where there would be no legacy system to serve as a backup to allow for continuity of benefits for the more than 40 percent of the population that receives nutrition assistance. System issues that lead to errors such as incorrect eligibility determinations or benefit allotments, or to incorrect notices being provided to applicants or participants, have opened State agencies to financial and legal liabilities.

1. PAPD Process

The PAPD process would take about 2 years (see table 7 of the FNS Handbook 901; USDA FNS, 2020). ADSEF would draft the document describing how ADSEF would investigate feasibility, system alternatives, and requirements and resources for proceeding with data systems development. The PAPD process may include procurement processes for contracts related to planning activities, such as a feasibility study. These procurements would need to meet the Puerto Rico and FNS procurement requirements described in chapter 2.

2. IAPD Process

The IAPD process begins near the end of the PAPD process and continues through full implementation of the data systems. The IAPD reports on outcomes of the planning activities and provides plans for data systems design and development, integration with existing systems (if applicable), testing, and deployment. The IAPD also includes the funding request for implementation activities and incorporates all procurement processes (e.g., requests for proposals, contracts) for systems development. As with procurements for the PAPD process, these procurements would need to meet the Puerto Rico and FNS procurement requirements described in chapter 2. Once the implementation is complete and the State agency moves to ongoing maintenance and operations of the data systems, FNS would conduct a final review and, upon approval, close the IAPD. Throughout the PAPD and IAPD processes, FNS requires annual APD updates. Additional IAPD updates would be required if there were significant changes in schedule or cost.

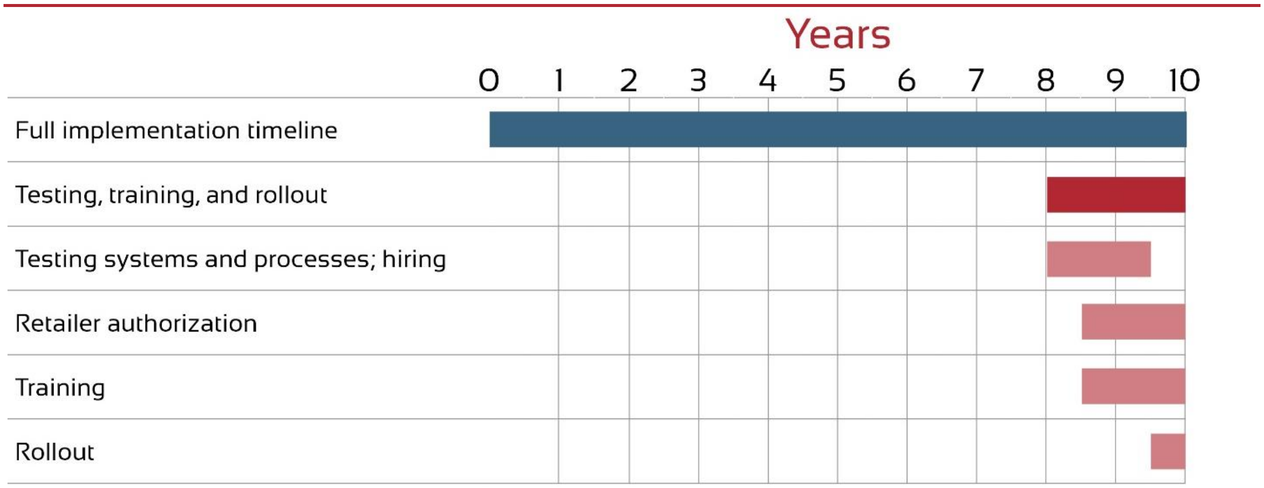
3. Implementation of Data Systems

Following (1) a successful PAPD process where system development parameters were clearly identified, (2) an approved IAPD from FNS, and (3) an approved RFP resulting in a successful solicitation and FNS-approved vendor contract, SNAP State agencies typically take at least 3 years for development and testing for large projects. This process often includes iterative review periods to ensure the contractor has interpreted the data systems requirements correctly. Understanding requirements can often present challenges because of highly regulated SNAP rules and required data systems functionality.

Chapter 6. Testing, Training, and Rollout

Six months prior to the end of the planning phase, ADSEF should begin testing, training, and rollout. In addition to supporting ADSEF, FNS would also begin to authorize retailers. This phase could last 24 months (see figure 6.1), and at the end of the phase, SNAP would be administered throughout Puerto Rico. Successful data systems testing, as required by FNS, could be a limiting factor to the pace of this phase.

Figure 6.1. Testing, Training, and Rollout Timeline



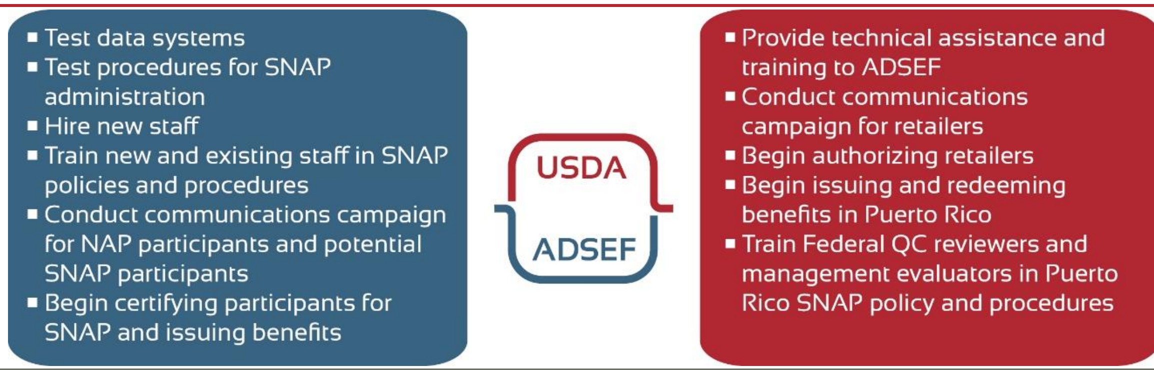
During the testing, training, and rollout phase, the SNAP implementation steering committee would need to oversee the completion of the remaining components of the State Plan of Operations, including the organizational outline, which describes the overall structure of the SNAP State agency and identifies the location of several key positions within the organizational structure. The steering committee would also need to review all components of the State Plan of Operations to ensure all materials meet the requirements of the State Plan of Operations Guide for the next fiscal year. FNS would hire the additional staff needed to administer SNAP in Puerto Rico at the Federal level and would begin authorizing retailers.

The pace of SNAP implementation and the number of people involved would increase during this phase. Over 24 months, ADSEF and FNS would focus on different aspects of the implementation process for each of three subcomponents of the phase, although many activities would stretch across all three subcomponents:

- For the first 12 months, the focus would be on **testing** systems and processes, developing training materials, hiring, continuing outreach to retailers, and authorizing retailers.
- During the next 6 months, the focus would shift to **training** and the communications campaign for participants. Authorizing retailers, hiring, and testing would continue.
- Assuming a staggered **rollout**, ADSEF would begin issuing SNAP benefits to the pilot population 18 months into the testing, training, and rollout phase. Hiring, training, the communications campaign, and authorizing retailers would continue.

Throughout this phase, the SNAP implementation steering committee would continue to provide oversight and coordination across all activities, and many other staff members and contractors would be needed to prepare and implement the SNAP rollout. ADSEF would need to ensure adequate staffing of NAP, even as many staff members work on SNAP implementation. Figure 6.2 illustrates key features of this phase.

Figure 6.2. Key Features of the Testing, Training, and Rollout Phase



Note: ADSEF = Administración de Desarrollo Socioeconómico de la Familia (Administration for the Socioeconomic Development of the Family); QC = Quality Control

The remainder of this chapter provides more detail on the activities ADSEF and FNS would perform during the testing, training, and rollout phase, organized by SNAP substantive area.

A. Certification and Benefit Issuance

At the beginning of the testing, training, and rollout phase, ADSEF would have a draft State Plan of Operations, a policies and procedures manual, participant-facing materials, and a plan for a staggered rollout. Recruiting and procurement processes would be underway.

During the first year of the phase, ADSEF's SNAP policy director would work with a small team of eligibility workers, eligibility supervisors, regional office staff, and data systems staff to test SNAP policies and procedures. This testing would consist of practicing the processes for submitting applications and making interview appointments, going through the certification and eligibility determination process, generating notices for applicants and participants, issuing benefits, processing change reports, and closing cases, all using dummy data in a sandbox version of the eligibility system. These dry runs would help identify process bottlenecks, technical issues, and points of confusion for staff; the SNAP policy director could then adjust the policies and procedures to address the problems and update documentation as necessary.

At the same time, the SNAP policy director, the IT project manager, and the data systems contractor would work with the training coordinator to develop materials for instructing staff on all aspects of the eligibility determination and benefit issuance processes and the data systems that support those processes. These materials would need to be customized for several audiences who interact with the processes in different ways: eligibility workers, eligibility supervisors, QC reviewers, and other ADSEF staff. The policy director and training coordinator would also develop plans for the training itself (i.e., format, location, number of participants per session, evaluation).

The steering committee would need to plan for staffing the rollout. These staffing plans would depend on the details of the rollout plan, but if ADSEF anticipates large numbers of households applying for benefits in person in a short period of time, it could consider temporarily reassigning staff from one local or regional office to another.

After the initial year of the testing, training, and rollout phase, ADSEF would have hired most of the new staff needed to administer SNAP and obtained the office space and materials needed to support them (e.g., computers, desks, telephones, office supplies). During the immediate lead-up to the initial implementation, the SNAP policy director and training coordinator would begin training in earnest. Most ADSEF staff would need to be trained on at least some aspects of SNAP eligibility determination and benefit issuance. As the policies and data systems would be complex and new to all staff members, the training would need to be substantial; the cost model assumes 4 weeks of training for eligibility workers, eligibility supervisors, and program integrity staff, and 2 weeks of training for other staff. Because staff would still be needed to operate NAP, training would need to be staggered.

During the final 6 months of this phase, ADSEF would conduct a live pilot test of the certification and benefit issuance processes and the data systems by issuing and redeeming SNAP benefits for a subset of the population. Based on what it learns during the pilot, ADSEF would adjust the policies and procedures manual. At the same time, the SNAP policy director and training coordinator would continue training staff. Throughout the final 6 months, the rollout would gradually expand to new areas or populations, so the rollout reaches the full population by the end of this phase. See the data systems section of this chapter (section H) for more details on the live pilot and rollout.

At least 6 months before the first SNAP benefits are issued in Puerto Rico, FNS would need to begin establishing funding mechanisms. This would include establishing grant award documents and a letter of credit. FNS would also need to work with ADSEF and its EBT processor to test procedures for issuing, transacting, and redeeming benefits.

B. Program Integrity

During this phase, ADSEF and FNS staff would need training on SNAP policies and procedures in Puerto Rico to prepare for program integrity work once SNAP has been rolled out.

1. SNAP QC

During the testing, training, and rollout phase, ADSEF would need to test QC systems and procedures. This would include testing the procedures for sampling and assigning cases to reviewers, pulling information on selected cases from the eligibility system, completing the Form 380 worksheet, and uploading information into SNAP QCS.

ADSEF's QC director, QC supervisors, and QC reviewers, and MARO's QC re-reviewers, would all need to be trained on SNAP policies and procedures in Puerto Rico. This could be achieved by attending some or all of the training for eligibility workers and supervisors. MARO's Integrity Branch and the National Office's QC Branch would need to provide training to ADSEF's QC team in conjunction with the SNAP QC director; this training would be developed during the initial part of the testing, training, and rollout phase and then updated as necessary after the training on SNAP policy in Puerto Rico. Training would cover processes and procedures for conducting reviews of active and negative cases and assessing application processing timeliness.

Once rollout begins, ADSEF would begin conducting QC reviews. If Congress authorizes a grace period before Puerto Rico becomes subject to liability for payment error rates (see chapter 5 of the feasibility report for more detail), this initial period of QC reviews would serve as an extended training period for ADSEF's QC team. MARO's Integrity Branch would need to provide thorough comments during the initial period of QC reviews and should consider additional trainings to clarify areas of confusion. Another goal of SNAP QC is to provide a steady stream of information on problems in the eligibility and benefit determination process; during the first year of the SNAP rollout, this information would be very valuable to ADSEF as it perfects its processes.

2. Participant Fraud Prevention and Investigation

During the testing and training phases, ADSEF would need to test participant fraud prevention and investigation processes and procedures. This would include testing the hotline to ensure it is functioning as intended and testing the system for determining which cases should be investigated and assigning staff for investigations. ADSEF would also test procedures for sharing information about SNAP households and benefit issuance with ROC to support investigations into retailer program violations. Similarly, ADSEF would work with the Department of Justice to test procedures for referring cases for prosecution.

ADSEF's participant fraud prevention and investigation staff would also need substantial training. They would need to attend at least a portion of the training for eligibility workers on eligibility and benefit determination to learn the details of program rules and processes. ADSEF would also train the fraud prevention and investigation staff in the process for arranging and conducting administrative hearings and the claims process. MARO's Integrity Branch would also provide training on rules and procedures for SNAP investigations. ADSEF should consider having supervisors observe investigative operations at a SNAP State agency that has implemented innovative approaches to fraud prevention and investigation to prepare for rollout.

At the time of rollout, the fraud prevention and investigation team would be prepared to staff the hotline and monitor SNAP benefit issuance and redemptions for potential questionable activity.

3. Management Evaluations

During the testing, training, and rollout phase, the management evaluation staff would need to be trained in all aspects of ADSEF's SNAP operations. To the extent possible, the management evaluation staff would attend training on eligibility and benefit determination processes, QC, SNAP E&T, civil rights protections, the participant claims process, participant fraud prevention and investigation, and SNAP-Ed. In addition to training on SNAP administration, MARO's management evaluation team would provide training to ADSEF staff in the process of conducting SNAP State agency-level management evaluations and the process of preparing for and responding to Regional Office management evaluations.

ADSEF would begin conducting management evaluations after SNAP has been implemented throughout Puerto Rico.

C. Retailer Authorization and Management

During the testing, training, and rollout phase, FNS would begin authorizing retailers to accept SNAP benefits in Puerto Rico. At the beginning of the phase, ROC would need to have a contract in place for inspections and investigations in Puerto Rico and would need to have sufficient staff ready to process applications in Spanish. Given the number of retailers authorized to accept NAP (more than 3,000), ROC would need to carefully consider staffing to ensure a large number of applications could be processed in a relatively short time. One ROC staff member can process 85–100 authorizations per month, meaning it would take about a year for three full-time staff to authorize retailers in Puerto Rico. Similarly, RIPID may experience a higher than usual demand for administrative reviews from retailers unfamiliar with SNAP requirements.

Although FNS would begin reaching out to retailers during the planning phase, the communications campaign would expand during the testing, training, and rollout phase. Communications materials would include detailed information on eligibility criteria and the application process. FNS could conduct general outreach and coordinate with ADSEF's OIC to communicate directly with all NAP retailers. Additionally, FNS could conduct webinars or question-and-answer sessions for retailers considering applying for authorization. Retailers would need to be informed of SNAP requirements such as the stocking requirements far enough in advance of the application period to make any changes needed in their stores.

Puerto Rico would need to have sufficient authorized retailers to ensure participant access as soon as SNAP begins rolling out. ROC should plan to begin accepting applications well in advance of the planned rollout date to allow adequate time for application submission, review, inspection, and authorization, and for retailers to obtain the necessary point-of-sale equipment.

Throughout this phase, ADSEF's OIC and DIP retailer unit would provide technical assistance to FNS about retailers and the retail landscape in Puerto Rico. OIC and DIP would continue authorizing and overseeing NAP retailers, respectively, until the NAP benefits were no longer in use and all retailer investigations were completed. At that time, OIC and DIP retailer staff would transfer to new positions.

D. Work Requirements and SNAP E&T

ADSEF's SNAP E&T director would work with the communications contractor on messaging related to SNAP work requirements and SNAP E&T if ADSEF elects to incorporate these topics in the communications campaign. The SNAP E&T director would test systems related to work requirements and SNAP E&T. This would include components of the data systems related to identifying work registrants, tracking the ABAWD time limit, and enforcing disqualifications when required. It would also include testing policies and procedures developed for referring SNAP participants to SNAP E&T.

The SNAP E&T director would also work with the SNAP policy director and training coordinator to ensure information on work requirements and SNAP E&T are accurately covered in training materials for eligibility workers, supervisors, and SNAP E&T staff such as case managers or contractors providing SNAP E&T services. ADSEF would also develop a process for informing SNAP E&T providers about their authority and responsibility to determine an individual is not a good fit for a SNAP E&T component.

E. Disaster Response

At the beginning of the testing, training, and rollout phase, ADSEF would initiate the procurement process to obtain supplies necessary to have on hand to operate a D-SNAP, such as a supply of EBT cards. These supplies would need to be available by the time SNAP rollout begins. ADSEF would also conduct user testing of the D-SNAP system, including testing procedures for issuing disaster supplements and replacements, and address any issues found during testing. ADSEF would keep information on staffing and contacts in the D-SNAP plan up to date during this phase. The steering committee would also work with the SNAP policy director and training coordinator to ensure information on disaster response is accurately covered in training materials for eligibility workers and supervisors.

MARO's Operations Branch would continue to provide technical assistance to ADSEF as ADSEF plans its disaster response and keeps the information in the D-SNAP plan current. The MARO Operations Branch and the Certification Policy Branch would also continue making information and resources about disaster response in SNAP available to ADSEF.

F. SNAP-Ed

SNAP-Ed grant funding is tied to the Federal fiscal year, so the final work to roll out SNAP-Ed could be on a different schedule than the broader SNAP implementation. During this phase, about 9 months before the beginning of the fiscal year in which funds would be awarded, ADSEF and its implementing agency partners would update the needs assessment and other SNAP-Ed State Plan components drafted during the planning phase. After FNS approval of the plan, SNAP-Ed would officially roll out at the beginning of the Federal fiscal year when grant funds are disbursed to Puerto Rico. The nutritionist would work with the SNAP policy director and training coordinator to incorporate information on SNAP-Ed into training for eligibility workers and supervisors.

G. Program Administration

ADSEF and FNS would need to sign the Federal-State agreement, which is the legal agreement between the SNAP State agency and USDA that verifies the SNAP State agency would operate SNAP in accordance with the authorizing legislation, related regulation, and the State Plan of Operations.

1. Outreach and Communications

A public communications campaign would be a crucial component of the testing, training, and rollout phase. At the beginning of this phase, ADSEF's Community Relations Office and its communications contractor would begin message development and testing. These efforts should be directed by the communications plan developed during Year 6 of the planning phase and should last about 12 months. Message development and testing consists of creating audience-specific materials and messages through an iterative approach in which members of the target audiences and other partners provide feedback on drafts of the communications as they are refined.[28] ADSEF and its communications contractor could use interviews, focus groups, or surveys to obtain feedback on materials.

In developing communications materials, ADSEF and its communications contractor should initially determine whether any existing content can be repurposed, such as by adapting national SNAP materials for their specific audience, adapting materials used by another State agency, or updating NAP materials. ADSEF and its communications contractor would also need to determine whether existing graphics, photographs, or video can be used for the new communications materials or develop plans for obtaining new content. Other considerations for developing communications materials include adapting materials to the technology platforms most frequently used by the target audience, applying plain-language principles to ensure ease of communication, and ensuring accessibility of materials for individuals with visual or auditory impairments.

ADSEF and its communications contractor would launch the communications campaign as outlined in the dissemination plan. It would begin in a limited capacity 9 months prior to SNAP implementation throughout Puerto Rico, with more intensive communications as SNAP was rolled out in specific geographic areas. Throughout the communications campaign, ADSEF and its communications contractor should gather and analyze data on the reach and effectiveness of the campaign and adjust as necessary.

[28] Specialized messaging strategies would need to be developed for subgroups likely to lose eligibility or benefits because of the transition.

If ADSEF opts to operate SNAP Outreach, it would use this phase to prepare for that work.

2. Fair Hearings

The Adjudicative Board should expect to hear appeals on eligibility and benefit determinations as soon as SNAP begins the rollout phase. During the testing phase, the Department of the Family would plan to hire additional staff and train adjudicators and support staff to handle SNAP appeals. With 861,000 SNAP households anticipated to enroll within the first year of the program (and considerably more applicants), the Adjudicative Board should be prepared to handle a large increase in appeals cases during the rollout phase before the number levels off. Even after rollout, the caseload is anticipated to be higher than for NAP.

During rollout, ADSEF should closely monitor appeals cases and ensure the data systems recording appeals and their outcomes meet the requirements for FNS reporting. Updates should be made as needed to ensure compliance with reporting prior to full rollout of SNAP.

3. Civil Rights

Prior to testing, MARO (in consultation with the Civil Rights Division) would conduct the Preapproval/Preaward Compliance Review to ensure ADSEF's compliance with civil rights requirements. All public-facing SNAP outreach materials and vital documents should meet the requirements for civil rights notification, and a system for processing civil rights complaints would be in place. If ADSEF elects to direct complaints directly to FNS, systems would not require testing, and MARO and the Civil Rights Division would need to prepare for a potential increase in complaints from Puerto Rico during rollout as a result of the larger number of SNAP applicants and participants. MARO and the FNS Civil Rights Division would also need to work with the policy director and training coordinator to ensure civil rights are appropriately incorporated into training for ADSEF staff and any partners, such as SNAP E&T providers, SNAP-Ed implementing agencies, and community-based organizations supporting the rollout.

If ADSEF elects to handle civil rights complaints, it would need to hire and train civil rights specialists to handle SNAP civil rights complaints and test the system for civil rights complaint processing during the testing phase. This could be accomplished through use case testing, submitting a variety of mock complaints to ADSEF through publicized channels and completing the process from acknowledgment through resolution. Reporting systems would also be tested to ensure ADSEF has access to civil rights data needed for reporting. MARO and the Civil Rights Division would provide technical assistance support by reviewing use case results with ADSEF, and the Civil Rights Division would provide feedback on mock reports to ensure they meet all civil rights requirements. Adjustments would be made as needed to ensure compliance with all civil rights requirements.

4. Financial Management and Reporting

The Office of the Assisting Administrator for Finance and Budget would prepare for rollout of SNAP by submitting the Budget Projection Statement (FNS-366A), which projects the total costs for major areas of SNAP operations and is a part of the State Plan of Operations. This budget would need to be updated annually. All final hiring decisions should be made, and new and transitioning NAP staff should be trained to produce SNAP reports.

Within 1 month of rollout, the Office of the Assisting Administrator for Finance and Budget should be prepared to submit monthly reports to FNS, including FNS-388 (State Issuance and Participation Estimates) and FNS-46 (Issuance Reconciliation Report). By the end of the first quarter, the Office of the

Assisting Administrator for Finance and Budget should be prepared to submit several quarterly reports, including FNS-209 (Status of Claims Against Households), FNS-388A (SNAP Project Area Data Format), SF-425 (Quarterly Financial Status report), FNS-778 (Financial reporting worksheet), and FNS-583 (Food and Nutrition Service SNAP E&T Program Activity Report).

Finally, the Office of the Assisting Administrator for Finance and Budget should prepare to submit several annual reports by the end of the first year of rollout: FNS-366A (Program and Budget Summary Statement Part A, Budget Projection), FNS-366B (Program and Budget Summary Statement Part B, Program Activity Statement), FNS-101 (Participation in Food Programs, by Race), and FNS-759 (SNAP-Ed Education and Administrative Reporting System Form).[29] MARO would closely review the initial report submissions with ADSEF to ensure compliance and help troubleshoot any observed issues in reporting. ADSEF would subsequently update reporting mechanisms as needed and submit monthly, quarterly, and annual reports as required.

H. Data Systems

During the testing, training, and rollout phase, ADSEF's IT project manager would oversee several key activities. FNS would need to approve the outcomes of each activity before ADSEF could move to the next stage in testing and rollout.

- **User acceptance testing (UAT).** UAT would begin as soon as the data systems were developed, but no later than the beginning of the testing, training, and rollout phase. User acceptance testing would be an iterative process, in which the issues discovered during one round of testing would be resolved before the next. Testers would be future end users who have not been involved in the systems development process. Because a limited number of end users in Puerto Rico would have the required SNAP policy expertise to recognize ways the systems might fail to align with policy, close partnership with FNS would be required to ensure all issues were identified. FNS approval is required before moving from UAT to pilot testing; approval is contingent upon the results of a go/no-go decision process based on detailed criteria specific to the project (USDA FNS, 2020). Frequently, multiple rounds of UAT are required.
- **Pilot testing**. The phased SNAP rollout would enable ADSEF to conduct a pilot test of the systems with a subset of the population in Puerto Rico. The ADESF system would need to meet specific FNS go/no-go criteria during the pilot test for FNS to approve the project to move from pilot to rollout.
- **Training.** At the beginning of the testing, training, and rollout phase, ADSEF or its IT contractor would begin developing training materials. Data systems training should be incorporated into subject matter-specific trainings being developed for specific ADSEF audiences. Data systems training would cover data systems access, functionality, and alignment between systems functionality and business processes. Training would begin in the month immediately preceding the initial SNAP implementation. It would be conducted on a rolling basis, beginning with central office staff and the local and regional office staff in the geographic area of the initial implementation. Additional trainings would be conducted as subsequent areas start rolling out SNAP.
- **Deployment.** Once the data systems were fully launched, users and developers would be responsible for monitoring and addressing defects, adding and training new users, and ensuring

[29] ADSEF completes NAP versions of the FNS-46, FNS-209, FNS-366a, FNS-388, FNS-388a, and SF-425. Several of these reports require more detail on SNAP activities than analogous reports for NAP, such as fraud investigations, fair hearings, administrative disqualifications, QC, and ADP. There is no NAP version of the FNS-101, FNS-292b, FNS-366b, FNS-583, FNS-759, or FNS-834.

continuity of program operations. At this point, if ADSEF chose to do so, the team could begin considering postimplementation add-on systems and features.

Chapter 7. Estimates of SNAP Participation in Puerto Rico

A key component to assessing the costs of operating SNAP is the likely number of households that would participate in SNAP. SNAP participation size would affect, for example, the number of eligibility workers needed, office space and equipment, and overhead costs. Estimated participation is used as a key input to the administrative cost model (see chapter 8). The study team used a microsimulation model to develop SNAP participation estimates under both standard Federal SNAP rules and BBCE rules; both estimates assume the SNAP eligibility thresholds, standard deduction, and maximum excess shelter deduction in effect for the 48 contiguous States and the District of Columbia.

Key findings follow:

- **Federal rules.** About 838,000 household units in Puerto Rico would have participated in SNAP in 2019. This is about 16 percent higher than participation in NAP for the same period. The estimated SNAP population would have been about 45.4 percent of the total population of Puerto Rico.
- **BBCE rules.** With a gross income limit of 200 percent of the poverty guidelines and no asset test, about 861,000 household units in Puerto Rico would have participated in SNAP in 2019. This is about 19 percent higher than participation in NAP. The estimated SNAP population under BBCE rules would have been about 46.6 percent of the total Puerto Rico population.

Section A describes the microsimulation methods used to estimate SNAP eligibility and participation in SNAP. Section B presents the results and the change in participation from NAP to SNAP. Appendix B provides details on the methods and parameters used for the model and participation estimates.

A. Microsimulation Methods

The study team used a microsimulation model to estimate eligibility for SNAP. The model uses the 2019 Puerto Rico Community Survey, which includes detailed income, shelter expense, and demographic information on households in Puerto Rico, and a simplified version of SNAP eligibility rules; these eligibility rules are coded in the model.[30] Just as an eligibility worker does, the model forms assistance units and applies SNAP eligibility rules to determine whether each household unit on the file is eligible for the program.[31]

SNAP eligibility was modeled under two scenarios:

- **Scenario 1: Federal SNAP rules.** This version follows standard Federal SNAP eligibility rules used in the continental United States.[32] The gross income limit is 130 percent of the Federal Poverty Guidelines, and the net income limit is 100 percent of the poverty guidelines. Households with elderly members or individuals with disabilities are not subject to the gross income standard. Federal SNAP rules also include a limit on assets such as the value of cash in bank accounts and vehicles.

[30] The approach builds on SNAP eligibility routines originally developed by Newman and Scherpf for the American Community Survey and used to estimate SNAP access rates for geographic and demographic subgroups (Newman & Scherpf, 2013).
[31] Because the PRCS collects data on annual income, the model provides estimates of the number of household units that would be eligible on average in 2019.
[32] For Federal SNAP eligibility requirements, see https://www.fns.usda.gov/snap/recipient/eligibility.

- **Scenario 2: BBCE rules.** This version uses BBCE rules under the option adopted by most SNAP State agencies.[33] Through BBCE, State agencies can choose to confer categorical eligibility for SNAP to households that receive a noncash benefit funded by TANF or Maintenance of Effort funds. While BBCE rules vary by State agency, the assumptions used for BBCE in the model include a gross income limit of 200 percent of the Federal Poverty Guidelines and no asset test. However, eligible households must also qualify for a positive benefit based on net income.

The microsimulation model applied the coded rules under each scenario to each household in the PRCS data to form assistance units and then determine whether each unit in the database was eligible for SNAP. To estimate SNAP participation, the study team used assumed participation rates among the eligible population would be less than 100 percent. Given Puerto Rico's focus on providing benefits to households with no income and to the elderly and people with disabilities in the absence of SSI, the study team assumed that all eligible units with no income or with only unearned income, such as Social Security, would participate in SNAP. For units with income from earnings, the study team used a participation rate of 71 percent, based on the participation rate among households with earnings in the United States (Lauffer & Vigil, 2021).

One notable limitation of the approach is the use of 2019 data (the most current available at the time of the study) in light of an anticipated 10-year SNAP implementation process. These estimates may not reflect SNAP eligibility and participation a decade or more into the future, as changes to the population, labor force participation, and the economy during this time may significantly impact the number of households and participants eligible for SNAP in either direction. For instance, additional natural disasters may further increase poverty and hardship in Puerto Rico, or alternatively, improvements to the economy or other safety net programs may decrease poverty and hardship. The population of Puerto Rico decreased 14.3 percent between 2010 and 2019 (U.S. Census Bureau, 2020); additional population decline or growth would also affect the number of SNAP participants.

Limitations in the PRCS data also affected the ability to simulate all aspects of SNAP eligibility. For example, the PRCS does not include information on who purchases and prepares food together, the relationship among household members not related to the household head, certain types of expenses allowed for deductions, or asset balances. In addition, the disability indicators on the PRCS are generally less restrictive than SNAP's definition of disability. The study team made assumptions or used proxy measures where information was missing. See appendix B for details on the methods used.

B. Estimates of SNAP Participation

Based on the microsimulation results, the study team found the transition from NAP to SNAP would increase the number of household units that would receive nutrition assistance in Puerto Rico. The study team estimated that, in an average month in 2019, 936,000 household units would be eligible for SNAP using Federal SNAP rules. Given the assumed rates of participation among household units with and without earned income, more than 838,000 of these eligible household units would participate in SNAP, for an increase of 16 percent over NAP participation in 2019 (see table 7.1). Using BBCE rules, approximately 965,000 household units were estimated to be eligible for SNAP; just under 861,000 of these household units would participate in SNAP, for an increase of 19 percent over NAP.[34] The increase

[33] As of January 2022, 41 States, the District of Columbia, Guam, and the U.S. Virgin Islands used BBCE rules. See https://fns-prod.azureedge.net/sites/default/files/resource-files/bbce-chart-jan-2022.pdf.

[34] The 2019 PRCS-based estimates of SNAP participation in Puerto Rico are similar to recent NAP participation caseloads under COVID-19. For example, in June 2021, NAP participation was approximately 865,000 households and 1.5 million individuals, which is almost the same as the estimated SNAP participation based on 2019 data. NAP participation is expected to decrease once the COVID-19 benefit increases and other NAP modifications under COVID-19 expire.

in participation is higher using BBCE rules than standard Federal rules because BBCE has a higher gross income screen and no asset test.

The transition from NAP to SNAP would also increase the percentage of the total population in Puerto Rico covered by nutrition assistance. With a total population of 3.19 million individuals in Puerto Rico in 2019 (based on the PRCS), about 1.4 million (45 percent of the population) would participate in SNAP using the estimates based on Federal SNAP rules, and 1.5 million (47 percent) would participate in SNAP using the estimates based on BBCE rules. In comparison, 42 percent of the population participated in NAP in 2019.

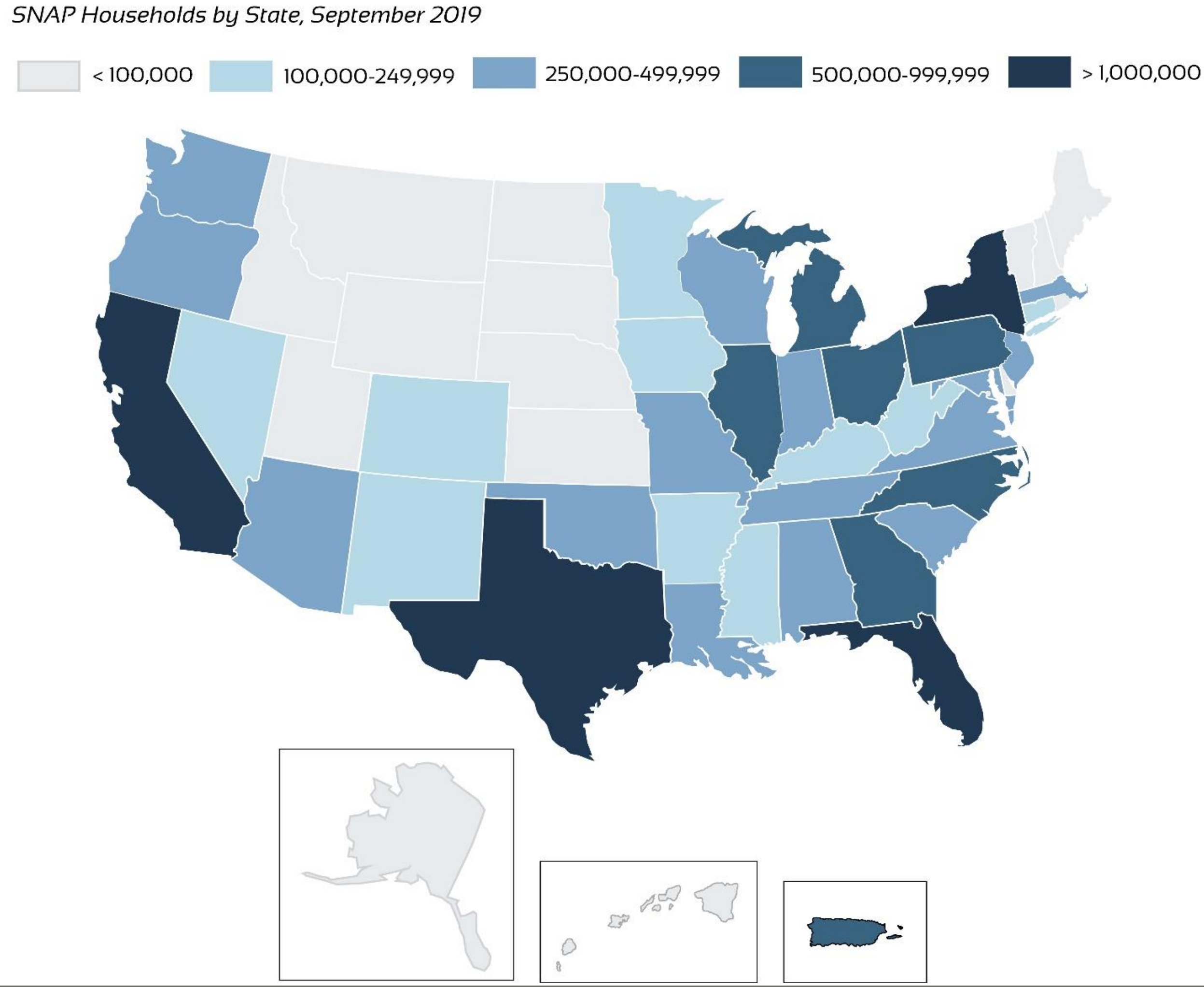
Table 7.1. Microsimulation Results: Estimated SNAP Participation in Puerto Rico

Measure	NAP	SNAP	Change
Federal Rules			
Participating household units	723,435	838,418	+15.9%
Participating individuals	1,330,902	1,449,360	+8.9%
Coverage of Puerto Rico population	41.7%	45.4%	+3.7 percentage points
BBCE Rules			
Participating household units	723,435	860,866	+19.0%
Participating individuals	1,330,902	1,488,620	+11.9%
Coverage of Puerto Rico population	41.7%	46.6%	+4.9 percentage points

Note: The 2019 PRCS-based microsimulation model provides estimates of the number of household units that would be eligible for SNAP in an average month during 2019.
BBCE = broad-based categorical eligibility; PRCS = Puerto Rico Community Survey
Sources: NAP participation: Administrative data for 2019 provided by ADSEF; SNAP participation: 2019 PRCS-based microsimulation model using Federal SNAP rules or BBCE rules and assumed participation rates

The estimated participation in Puerto Rico can be compared with SNAP participation in other States to provide context for the anticipated size of the SNAP population and the resources needed to support SNAP in Puerto Rico (see figure 7.1). Puerto Rico's SNAP population would be similar in size to the SNAP population of Georgia, Illinois, Michigan, North Carolina, Ohio, and Pennsylvania. Based on discussions with ADSEF and FNS policy staff, Puerto Rico would likely implement BBCE rules for determining SNAP eligibility in Puerto Rico because, without an asset test, administrative burden would be lower for both eligibility workers and SNAP applicants. As such, the study team used the SNAP participation estimates under BBCE rules to estimate costs (see chapter 8).

Figure 7.1. Estimated Number of SNAP Households in Puerto Rico (2019 Data) Compared With Actual SNAP Households by State, September 2019



Sources: SNAP participation: National Data Bank Version 8.2 PUBLIC—Supplemental Nutrition Assistance Program, SNAP Monthly State Participation and Benefit Summary—Public Data, Fiscal Year 2019, September; estimated SNAP participation in Puerto Rico, authors' calculations using 2019 Puerto Rico Community Survey data

Chapter 8. Administrative Costs

The study team estimated rough order of magnitude costs to Puerto Rico and the Federal Government for implementing and operating SNAP in Puerto Rico. To estimate implementation costs, the team used a "building up" strategy based on estimates of the amount of time ADSEF staff, FNS staff, and consultants would need to spend each year leading up to full SNAP rollout. Implementation costs also include estimates for data systems development and implementation based on the SNAP portion of recent data systems builds and other direct costs.

To estimate ongoing SNAP operating costs at the State agency level, the team used actual SNAP cost data for fiscal years 2017, 2018, and 2019 from six States with similar administrative models and caseload size to what is anticipated in Puerto Rico and adjusted those costs to account for Puerto Rico's lower salary scale. The study team used a building-up approach to estimate operating costs at the Federal level. The study team also included estimates of retailer inspection and investigation costs and SNAP benefits costs to estimate the total ongoing cost of SNAP in Puerto Rico.

Key findings follow:

- Implementing SNAP (i.e., carrying out regulation development; program design; planning; and testing, training, and rollout phases) is estimated to cost between $341 million and $426 million over the course of the 10-year implementation period. Approximately 84 percent of the total estimated implementation cost is for data systems development.
- Administering SNAP on an annual basis after rollout would cost an estimated $249 million to $414 million. This includes costs for certification, issuance, fraud control, data systems operation and maintenance, SNAP E&T, QC, fair hearings, management evaluations, and SNAP-Ed. It also includes costs for the FNS National and Regional Offices. FNS would incur about 54 percent of these costs, including about 50 percent of Puerto Rico's administrative costs.
- The estimated cost of benefits to SNAP participants in Puerto Rico is $4.5 billion annually based on an estimated average monthly SNAP participation of 861,000 households.
- Had SNAP been implemented in Puerto Rico in FY 2021, the total annual operating costs and benefits costs would have been $3.9 billion ($1.9 billion more than the FY 2021 NAP block grant). Total annual operating costs would have been $127 million more than those of NAP.

Section A of this chapter describes the limitations to these estimates. Section B summarizes the estimate of the costs of implementing SNAP over the next 10 years, and section C presents the estimates of annual operating costs. Section D compares NAP to SNAP costs.

A. Limitations

There is significant uncertainty regarding many cost drivers because no State agency has implemented SNAP in the past 40 years; there are no direct examples to use as sources of cost data for a program implementation of this magnitude. Similarly, all recent major data systems development efforts have been integrated systems, in which SNAP functions constitute only a fraction of the overall system. Estimates of SNAP benefit costs also depend on several unknown factors, such as the eligibility threshold and basis for benefits that Congress would establish in the authorizing legislation and the level of SNAP eligibility and participation rates in Puerto Rico 10 or more years in the future.

Other sources of uncertainty in the cost estimates follow:

- Changes in ADSEF's administration of NAP (including the potential adoption of efficient technologies) during the 10 years leading up to SNAP implementation
- Changes in factors that affect the size of the SNAP caseload—including economic conditions or natural disasters in Puerto Rico—during the 10 years leading up to SNAP implementation
- Changes to the implementation timeline; delays in SNAP implementation would likely increase costs
- The time and steps needed for ADSEF to recruit and hire sufficient and qualified staff to operate NAP and SNAP
- Potential salary increases for ADSEF staff as a result of a current initiative to align job descriptions and salaries across the government
- Changes in SNAP policy and regulatory requirements during the 10 years leading up to SNAP implementation

The cost estimates presented in this implementation plan reflect the combined expertise of the study team and FNS, but the lack of precedent and the many areas of uncertainty mean the costs presented here should be viewed as a rough order of magnitude estimate of the costs of implementing SNAP, not a precise prediction.

B. SNAP Implementation Costs

This implementation plan describes a 10-year process for designing, planning, and rolling out SNAP in Puerto Rico. This section describes the approach to calculating costs and provides the estimated costs for four main components: staff labor costs, consultant costs, design and development of data systems, and other direct costs.

1. Labor Cost Approach

The study team estimated implementation labor costs using a building-up approach, in which the team identified labor categories needed to support the implementation and estimated the amount of time each labor category would need to spend supporting the implementation effort each year. For each labor category, the team estimated the cost of one full-time equivalent (FTE) was equal to—

*(Annual Salary + Fringe Benefits + Overhead) * Inflation*

Table 8.1 summarizes the data used to estimate labor costs for ADSEF and FNS during the implementation period; see chapter 2 for a discussion of leadership and staffing during the implementation period.

Table 8.1. Data Sources for SNAP Implementation Labor Cost Estimates

Estimate Component	Data Source
Labor categories	Discussions with ADSEF and FNS subject matter experts; see appendix C table C.1 for a list of the labor categories included in the cost model
Time needed	Discussions with ADSEF and FNS subject matter experts; see appendix C table C.2 for estimates of the amount of time dedicated to SNAP implementation by labor category during each year of the implementation period

Estimate Component	Data Source
Annual salary	For Puerto Rico: ADSEF staff roster and salaries from April 2021 For FNS: U.S. Office of Personnel Management General Schedule Pay Scale, based on locations of FNS offices in the Washington, DC, area; Robbinsville, New Jersey; and Denver, Colorado
Fringe benefits	For Puerto Rico: Estimated to be 20 percent of annual salary For FNS: Estimated to be 30 percent of annual salary
Overhead	U.S. Office of Personnel Management Cost per Person Model; assumptions of overhead costs per person include— ▪ Annual information technology costs of $5,000 ▪ Annual telecommunications costs of $497 ▪ Annual real estate costs of $278
Inflation	Office of Management and Budget's 5-year average inflation rate (1.9 percent per year)

Note: ADSEF = Administración de Desarrollo Socioeconómico de la Familia (Administration for the Socioeconomic Development of the Family)

In addition to ADSEF staff, Puerto Rico would require the assistance of numerous consultants throughout the 10-year implementation period. Table C.1 in appendix C lists the consultants the study team assumed would be required during the implementation period. Assumptions regarding consultant roles and costs are based on discussions with subject matter experts on the current costs for procuring technical assistance and other services needed.

Table 8.2 presents the estimated costs for ADSEF labor, consultant labor, and FNS labor by year over the 10-year implementation period. Costs increase later in the implementation period as the work becomes more labor intensive.

Table 8.2. Estimated Labor Costs for Implementation

Year	ADSEF Labor Costs ($)	Consultant Costs ($)	FNS Labor Costs ($)	Total ($)
1	759,431	601,448	1,773,321	3,134,200
2	834,277	613,056	1,807,546	3,254,880
3	765,812	667,719	1,523,342	2,956,874
4	784,827	680,606	1,587,942	3,053,375
5	799,974	649,242	1,666,589	3,115,805
6	815,414	661,772	1,520,940	2,998,126
7	917,402	674,544	1,550,294	3,142,240
8	1,049,730	687,563	2,590,752	4,328,045
9	1,531,240	748,869	2,886,214	5,166,324
10	7,468,447	2,316,170	4,762,963	14,547,579
Total	**15,726,554**	**8,300,991**	**21,669,903**	**45,697,449**

Note: ADSEF =Administración de Desarrollo Socioeconómico de la Familia (Administration for the Socioeconomic Development of the Family)

2. Data Systems Design and Development Costs Approach

To administer SNAP, ADSEF would be required to develop several data systems. For example, ADSEF would be required to develop a new eligibility system with a rules engine that reflects SNAP. ADSEF would also need to develop or modify systems for supporting case management, data verification, financial management and accounting, EBT issuance and tracking, State QC review, and D-SNAP eligibility determination.

The most significant systems development costs would be for the eligibility system. The study team estimated the costs of developing a SNAP eligibility system based on recent eligibility system builds conducted in other State agencies and on conversations with subject matter experts at FNS. These estimates have several caveats. For example, almost all State agencies build integrated eligibility systems that include rules engines that serve multiple programs, including SNAP, Medicaid, and TANF. As a result, there are no comparable projects that reflect the costs of developing a SNAP-only eligibility system. The costs of these integrated eligibility systems are shared across programs, with FNS paying only a portion of the development costs. ADSEF would also have unique challenges and constraints—including challenges related to the stability of Puerto Rico's telecommunications infrastructure—that would affect costs in ways other States agencies have not experienced.

It is common for large data systems projects to exceed State agencies' initial cost estimates. The FNS experience is that the average system costs—across a wide variety of project types and duration—demonstrate a 65 percent increase over original projections. This is often because of significant laws or policy changes that occur during system development (such as the Patient Protection and Affordable Care Act), changes in public health or social services priorities, and the addition of new programs to integrated systems. Costs also increase as a result of schedule slippage, poor performance by contractors, inadequate project governance, and many other factors. ADSEF may experience any or all of these scenarios.

The study team used FNS data on the total costs to date of six current and recent eligibility systems builds. The total costs for these systems, including the development of rules engines for other programs, range from $400 million to $600 million. Using current cost allocation rules, SNAP is responsible for an average of $178 million for these systems.

The study team assumed the costs of Puerto Rico's eligibility system would be greater than the average SNAP share for recent eligibility system builds. Specifically, the team assumed the costs would include the SNAP share plus some fixed costs that are currently spread across all programs covered by the system. Because no data are available to provide estimates of the fixed costs for these systems, the team estimated the fixed costs at between 10 and 20 percent of total costs of the six current and recent builds. The 10 percent fixed cost assumption is used to derive a lower cost estimate, and the 20 percent fixed cost assumption is used to derive a higher cost estimate. Combined, this results in an eligibility system cost estimate of between $231 million and $284 million (table 8.3). The midpoint of this range—$258 million—is used when estimating the total implementation costs for a SNAP eligibility system in Puerto Rico.

In addition to the development of a SNAP eligibility system, ADSEF would need to develop systems to support functions such as EBT, SNAP E&T tracking, and other process tools.[35] Estimating the costs of these additional systems is difficult. Cost estimates would require a detailed review of requirements for the ADSEF SNAP eligibility system and the development of requirements for these additional systems. Further complicating the study team's ability to generate cost estimates is the lack information on the costs of comparable systems in other State agencies. Given these challenges, the study team assumed the costs of systems development above and beyond those of the eligibility system would be equal to 25 percent of the eligibility system costs. Using this assumption, the costs for other systems would range between $58 million and $71 million, bringing the total systems development costs to between $289 million and $355 million (table 8.3). Again, the midpoint of this cost estimate range is used when estimating the total implementation costs for SNAP in Puerto Rico.

[35] Because ADSEF could use the QC system FNS developed for State agencies, the study team did not include QC system costs in the estimates.

Table 8.3. Estimated Costs of Data Systems Development

	Low Estimate ($)	Midpoint ($)	High Estimate ($)
SNAP eligibility system			
Average SNAP share of current eligibility system builds	178,355,122	178,355,122	178,355,122
Estimated fixed costs	52,860,547	79,290,820	105,721,094
Eligibility system subtotal	231,215,669	257,645,942	284,076,216
Other systems development (25 percent of eligibility system)	57,803,917	64,441,486	71,019,054
Total systems development	**289,019,586**	**322,057,048**	**355,095,270**

3. Other Direct Costs Approach

In addition to labor costs, the study team estimated other direct costs for ADSEF and FNS during implementation based on discussions with subject matter experts. Appendix table C.5 presents the costs of these other direct costs by implementation year:

- Travel for Puerto Rico staff to other SNAP State agencies during program design and planning phases, and on-island travel for testing, training, and the communications campaign in Years 8–10
- Travel for FNS staff to Puerto Rico for training of ADSEF staff in Years 9–10
- Costs of communications campaign to inform the public and retailers about the transition to SNAP (the team estimated the one-time communications campaign cost as 7 percent of the annual operating budget for SNAP)
- FNS to translate SNAP internal documents (e.g., handbooks, toolkits) into Spanish

4. Estimated SNAP Implementation Costs

The study team estimated it would cost approximately $384 million to implement SNAP in Puerto Rico over a 10-year period. As table 8.4 shows, this includes $15.7 million in ADSEF labor costs, $21.7 million in labor costs at FNS, and $8.3 million in consultant costs. The team estimated another $15.9 million would be required for direct costs associated with travel, translation, and the communications campaign. The costs of building data systems would be approximately $322 million (84 percent of total implementation costs). Considering the potential variation in data systems and other costs, the actual costs of implementing SNAP could fall between $341 million and $426 million.[36]

Ongoing State agency-level SNAP administrative costs are split approximately evenly between the State agency and the Federal Government. However, because there is no precedent for this type of implementation project, the study team did not make assumptions about the proportion of the implementation costs Puerto Rico would be responsible for.

The study team recommends that ADSEF and FNS revisit the assumptions used to calculate the cost estimates midway through the implementation period to identify any major changes (e.g., estimates of SNAP participation) that may affect the cost of implementation, particularly in Year 10. Appendix tables

[36] The low and high estimates of labor, consultant, and other direct costs are 15 percent less than and 15 percent greater than the midpoint, respectively.

C.4 and C.5 present the fully loaded salary assumptions and implementation cost estimates by staff and by year for the 10-year implementation period.

Table 8.4. Estimated Costs of Implementation

Cost Category	Estimated Costs ($)		
	Low	Midpoint	High
ADSEF labor	13,367,571	15,726,554	18,085,538
ADSEF consultants	7,055,843	8,300,991	9,546,140
FNS labor	18,419,417	21,669,903	24,920,388
Data systems costs	289,019,586	322,057,428	355,095,270
Other direct costs	13,526,485	15,913,511	18,300,538
Total	341,388,902	383,668,388	425,947,874

Note: ADSEF = Administración de Desarrollo Socioeconómico de la Familia (Administration for the Socioeconomic Development of the Family)

C. Annual SNAP Operating and Benefits Costs

This section describes the approach to calculating costs and provides the estimated costs for the four main components of ongoing costs: ADSEF administrative operating costs, FNS annual labor costs for ongoing administration, FNS annual contractor costs for ongoing administration, and annual participant benefit costs. This section concludes with a presentation of overall annual operating costs.

1. ADSEF Administrative Operating Cost Approach

The study team based estimates of ADSEF's ongoing administrative SNAP operating costs on actual costs incurred by a set of comparison SNAP State agencies. The study team estimated costs for the 10 categories of SNAP administrative costs reported by State agencies and tracked by FNS (see text box). For each cost category, the team estimated Puerto Rico's costs using data from comparison State agencies with the following process:

SNAP Administrative Cost Categories

- Certification costs
- Issuance costs
- Fraud control
- ADP development
- ADP operations
- SNAP E&T
- SNAP QC
- Fair hearings
- Management evaluations
- SNAP-Ed

1. Compute the average costs per household using data from the comparison State agencies for 2017, 2018, and 2019.
2. Prorate costs per household based on eligibility worker salaries in Puerto Rico and percentage of costs attributed to labor.
3. Apply prorated costs per household to anticipated Puerto Rico SNAP caseload.
4. Split estimated costs between Puerto Rico and the Federal Government.[37]

The following sections describe each step in greater detail. The subsections illustrate the process for selecting comparison State agencies and completing step 1 through step 4 for certification costs. The computations for the other cost categories appear in appendix C, tables C.6 through C.14.

[37] SNAP-Ed funding would be 100 percent Federal. All other costs would be divided between Puerto Rico and the Federal Government.

a. Select Comparison State Agencies

Other State agencies' experiences with SNAP costs can be informative because they must adhere to the same overall program rules and regulations. However, because SNAP is State administered, and different State agencies' decisions can have implications for administrative costs, care must be taken when selecting which State agencies to use as the basis for costs in Puerto Rico. Key cost drivers include the following:

- **The number of households participating in SNAP.** The study team estimates 861,000 households would have participated in SNAP in 2019 if it had been offered in Puerto Rico.
- **Policy decisions.** BBCE and simplified reporting affect the level of eligibility worker effort needed to process SNAP applications; these policies have been estimated to reduce administrative costs by 7 percent (Geller et al., 2019). To estimate costs, the study team assumed Puerto Rico would opt for simplified reporting and BBCE.
- **Service delivery model.** Casebanking, specialization of eligibility worker functions into distinct staff units, and office consolidation would have implications for administrative costs. The study team assumed ADSEF would continue the casebanking approach it planned to begin in fall 2021 under SNAP but would not specialize caseworker units or further consolidate local offices.
- **Staff salaries.** The FY 2021 average salary for eligibility workers in Puerto Rico is $22,449.[38]

The study team identified six States similar to Puerto Rico in caseload, key policies, and service delivery model (see table 8.5). Two of the States use simplified reporting only, and all six use BBCE. Four of the States use casebanking, while Michigan uses a traditional caseworker model and Pennsylvania's service delivery model varies by project area. None of the States have specialized units performing a portion of the eligibility determination process. Caseloads in the comparison States range from 400,000 to 900,000. Salaries for eligibility workers in Puerto Rico are lower than in any SNAP State agency, so it was not feasible to identify comparison States using salary as a criterion.

Table 8.5. Comparison States for Estimating Ongoing Administrative Costs for Operating SNAP in Puerto Rico

State	Reporting Policy	BBCE	Model	Specialized Units	Average Number of SNAP Households (2017–2019)	Eligibility Worker Salary ($)
Puerto Rico	Simplified	Yes	Casebanking	No	861,000*	22,449
Georgia	Simplified	Yes	Casebanking	No	614,750	35,750
Illinois	Simplified + Change	Yes	Casebanking	No	816,044	56,500
Massachusetts	Simplified + Change	Yes	Casebanking	No	416,128	54,080
Michigan	Simplified + Change	Yes	Caseworker	No	631,699	52,965

[38] Eligibility worker salaries vary by level; to compute the average eligibility worker salary, the study team computed an average across levels weighted by the number of workers at each level.

State	Reporting Policy	BBCE	Model	Specialized Units	Average Number of SNAP Households (2017–2019)	Eligibility Worker Salary ($)
Pennsylvania	Simplified + Change	Yes	Varies	No	872,822	51,171
Washington	Simplified	Yes	Casebanking	No	482,025	63,016

BBCE = broad-based categorical eligibility
*The number of SNAP households in Puerto Rico reflects simulation estimates for 2019.
Sources: Reporting policies, BBCE, model, specialized units: USDA FNS, 2018b; SNAP households: USDA FNS, n.d.b; eligibility worker salary: USDA FNS, 2018b

b. Compute Average Costs per SNAP Household

Within each State agency, the study team computed the average cost per SNAP household by simply dividing total costs by the number of SNAP households. For example, in 2019, Georgia spent $117 million in certification costs for 615,000 households, or $190 per household (see table 8.6). Because costs and caseloads can vary over years, the team computed the average costs per household for each State agency over a 3-year period (2017–2019).

For the QC cost category, the team computed costs per QC case instead of costs per household. For some cost categories, the team eliminated outlier costs before calculating costs per household. Outlier costs include any costs reported as $0 in a given year and inconsistently large costs (e.g., Pennsylvania's ADP development costs were less than $1 million in 2017 and 2018 but increased to more than $10 million in 2019; as a result, the study team excluded Pennsylvania's 2019 ADP development costs).

Table 8.6. Calculating Certification Costs per Household

State	2017	2018	2019	Average
Actual Certification Cost Data (Total Costs, $)				
Georgia	128,875,808	127,672,652	116,568,750	124,372,403
Illinois	144,354,068	142,293,626	152,201,030	146,282,908
Massachusetts	102,283,712	99,941,464	111,514,150	104,579,775
Michigan	206,025,000	239,703,094	227,241,764	224,323,286
Pennsylvania	278,584,504	257,906,758	254,448,752	263,646,671
Washington	114,071,182	113,637,388	122,846,686	116,851,752
Average	**162,365,712**	**163,525,830**	**164,136,855**	**163,342,799**
Certification Costs per Household (Costs per Household, $)				
Georgia	170	177	190	179
Illinois	148	155	187	163
Massachusetts	229	222	268	240
Michigan	283	350	360	331
Pennsylvania	293	270	292	285
Washington	219	226	255	233
Average	**224**	**233**	**258**	**238**

c. Prorate Costs per Household

The study team assumed that 90 percent of all costs are driven by labor costs (i.e., 10 percent are fixed and would apply to Puerto Rico without adjustment). For the labor-driven portion of the costs, the study team prorated the actual costs per household to account for the difference between the State agency's salaries and ADSEF's salaries. Specifically, the team used the difference between average eligibility worker salaries in each State agency and in Puerto Rico.

For example, in 2019, Georgia's certification costs per household were $190. The study team assumed that 90 percent of these costs (or $171 per household) were driven by labor and the remaining 10 percent (or $19 per household) were driven by nonlabor costs (see table 8.7). The study team prorated the labor costs per household by the ratio of Puerto Rico's average eligibility worker salary in 2019 ($22,449) to Georgia's average eligibility worker salary in 2019 ($35,750), or 63 percent. Thus, Georgia's certification costs per household after prorating for salary differences is ($171 * 0.63) + $19 = $126. This process was repeated for all six State agencies for each year, 2017–2019.

Table 8.7. Adjusting per Household Certification Costs for Salary Differences

State	2017	2018	2019	Average
Adjust Costs for Percentage Driven by Labor (Costs per Household, $)				
Georgia	113	118	126	119
Illinois	98	103	124	108
Massachusetts	153	147	178	159
Michigan	188	233	239	220
Pennsylvania	195	179	194	189
Washington	146	151	170	155
Average	**149**	**155**	**172**	**159**

Note: The study team assumes labor costs were 90 percent of costs in each State agency.

d. Apply Prorated Costs per Household to Puerto Rico's Estimated Caseload

The study team applied the prorated costs per household in each State agency for each year to the projected Puerto Rico SNAP caseload for 2019 (see table 8.8). This provides an estimate of what Puerto Rico's costs would have been from 2017 to 2019 had it operated SNAP with similar cost drivers as the comparison State agencies with a caseload of 861,000 households.

Table 8.8. Projected Puerto Rico Certification Costs

State	2017	2018	2019	Average
Project Puerto Rico Costs ($)				
Georgia	97,567,996	101,301,411	108,550,577	102,473,328
Illinois	84,611,389	88,515,279	106,770,813	93,299,161
Massachusetts	131,333,641	126,837,704	153,409,260	137,193,535
Michigan	161,891,260	200,615,940	205,933,261	189,480,154
Pennsylvania	167,624,433	154,367,474	166,887,257	162,959,721
Washington	125,460,037	129,622,464	145,895,675	133,659,392
Average	**128,081,459**	**133,543,379**	**147,907,807**	**136,510,882**

The final cost estimate is derived as the prorated Puerto Rico cost averaged across the six comparison States and all years (Puerto Rico would incur an estimated $137 million in annual certification costs). Tables C.6 through C.14 in appendix C include the data used to calculate Puerto Rico's costs for each of the other 9 cost categories.

The study team projected administrative costs to 2031, when SNAP could potentially be rolled out in Puerto Rico, by assuming an annual inflation rate of 1.9 percent (table 8.9).[39] Because Puerto Rico likely would need to raise worker salaries to recruit sufficient workers to operate SNAP, the team also estimated annual operating costs assuming 35 percent and 75 percent salary increases.[40] These increases would raise annual costs to as much as $408 million (table 8.9).

Table 8.9. Estimated Total SNAP Operating Costs in Puerto Rico With Salary Increases (in 2031 Dollars)

Cost Category	Projected SNAP Administrative Costs in 2031		
	FY 2021 Puerto Rico Salary Plus Inflation	35 Percent Increase	75 Percent Increase
Certification	171,708,408	225,796,557	287,611,584
Issuance	6,911,354	9,088,431	11,576,518
Fraud control	6,906,368	9,081,874	11,568,167
ADP development	1,061,224	1,885,652	2,401,876
ADP operations	27,569,341	36,253,683	46,178,646
SNAP E&T	6,904,096	9,078,886	11,564,361
QC	3,243,292	4,264,929	5,432,514
Fair hearings	1,597,232	1,940,777	2,472,093
MEs	3,331,896	4,381,444	5,580,926
Nutrition education	13,980,851	18,384,819	23,417,925
Total	**243,214,063**	**320,157,052**	**407,804,609**

Note: ADP = automated data processing; MEs = management evaluations; QC = Quality Control; SNAP E&T = SNAP Employment and Training

e. Split Estimated Costs Between Puerto Rico and the Federal Government

For most components of SNAP administration at the State agency level, the study team split costs evenly between Puerto Rico and the Federal Government. However, two components of SNAP administrative costs—SNAP E&T and SNAP-Ed—have a different cost share. The cost of SNAP-Ed would be borne

[39] This inflation rate assumption is based on the Office of Management and Budget's 5-year average inflation rate (1.9 percent per year).

[40] The study team used salary increases of 35 and 75 percent because they appeared to be reasonable low- and high-range estimates of the changes needed to align ADSEF eligibility worker salaries with salaries of other employment opportunities in Puerto Rico. To arrive at these ranges, the team examined the relationship between eligibility worker salaries and other salaries in Puerto Rico and in the six comparison States. Specifically, the team examined the relationship between eligibility worker salaries and those of a business analyst and restaurant manager. The team chose business analysts as a comparison salary because, like eligibility workers in Puerto Rico, business analysts typically have a 4-year degree. The team chose restaurant managers because salaries for restaurant managers in the six comparison States tend to be comparable to salaries of eligibility workers in those States. Salary information for business analysts and restaurant managers in all States was obtained from Indeed.com for 2021. Regarding business analysts, the average Puerto Rico eligibility worker salary is approximately 41 percent of the average Puerto Rico business analyst salary, while the average comparison State eligibility worker salary is 75 percent of the average comparison State business analyst salary. To align Puerto Rico eligibility worker salaries with those of Puerto Rico business analysts (i.e., like the comparison States, to be 75 percent of the business analyst salary), Puerto Rico eligibility worker salaries would need to increase to $40,700, an increase of 81 percent. With respect to restaurant managers, the average Puerto Rico eligibility worker salary is approximately 66 percent of the average Puerto Rico restaurant manager salary, while the average comparison State eligibility worker salary is 103 percent of the average comparison State restaurant manager salary. To align Puerto Rico eligibility worker salaries with those of Puerto Rico restaurant managers (i.e., like the comparison States, to be 103 percent of the restaurant manager salaries), Puerto Rico eligibility worker salaries would need to increase to $34,900, an increase of 55 percent. While these two comparison salaries suggest salary increase ranges of 55 to 81 percent, the study team set the lower and upper level salary increases at 35 and 75 percent to reflect that salary increases of this magnitude may be difficult to achieve.

entirely by the Federal Government. Some SNAP E&T costs are borne entirely by the Federal Government, while other SNAP E&T costs are divided evenly between the State agency and the Federal Government. For the purposes of these cost estimates, the study team assumed Puerto Rico would receive the minimum SNAP E&T grant of $100,000, making the Federal share of SNAP E&T costs $100,000 more than the Puerto Rico share.

For all cost categories, cost estimates reflect the costs of a mature program. Actual costs for some categories in Puerto Rico could be lower in initial years of SNAP administration. For example, SNAP-Ed and SNAP E&T costs could be lower at first if these programs were implemented on a limited scale; costs could increase over time as programming offered and participation increased. While SNAP-Ed administrative costs would be borne entirely by the Federal Government, SNAP E&T costs would be shared between the Federal Government and Puerto Rico. For other categories, such as certification, costs could be higher in initial years because the systems and processes would be new for ADSEF employees and SNAP applicants and participants. These costs could decrease after the initial learning phase.

Table 8.10 presents the cost estimates for all 10 administrative cost categories. The study team estimated that if Puerto Rico had similar cost drivers as the six State agencies included in the model, its total administrative costs would be $243 million in 2031. Somewhat more than half of these costs—$129 million—would be borne by FNS and the rest by Puerto Rico (this does not include direct costs to FNS National and Regional Offices incurred to oversee SNAP in Puerto Rico; these are discussed in the next section). With a 75 percent salary increase, total administrative costs for Puerto Rico would be $408 million per year.

Table 8.10. Projected Annual SNAP Administrative Costs (in 2031 Dollars)

Cost Category	Puerto Rico	Federal Government	Total
Assuming No Increase in FY 2021 Puerto Rico Salaries Except Inflation			
Certification	85,854,204	85,854,204	171,708,408
Issuance	3,455,677	3,455,677	6,911,354
Fraud control	3,453,184	3,453,184	6,906,368
ADP development	530,612	530,612	1,061,224
ADP operations	13,784,670	13,784,670	27,569,341
SNAP E&T	3,402,048	3,502,048	6,904,096
QC	1,621,646	1,621,646	3,243,292
Fair hearings	798,616	798,616	1,597,232
MEs	1,665,948	1,665,948	3,331,896
Nutrition education	-	13,980,851	13,980,851
Total	**114,566,606**	**128,647,457**	**243,214,063**
Assuming 75 Percent Increase in Puerto Rico Salaries			
Certification	143,805,792	143,805,792	287,611,584
Issuance	5,788,259	5,788,259	11,576,518
Fraud control	5,784,084	5,784,084	11,568,167
ADP development	1,200,938	1,200,938	2,401,876
ADP operations	23,089,323	23,089,323	46,178,646
SNAP E&T	5,732,180	5,832,180	11,564,361
QC	2,716,257	2,716,257	5,432,514

Cost Category	Puerto Rico	Federal Government	Total
Fair hearings	1,236,046	1,236,046	2,472,093
MEs	2,790,463	2,790,463	5,580,926
Nutrition education	-	23,417,925	23,417,925
Total	**192,143,342**	**215,661,267**	**407,804,609**

Note: ADP = automated data processing; MEs = management evaluations; QC = Quality Control; SNAP E&T = SNAP Employment and Training

2. Ongoing FNS SNAP Administration Cost Estimate Approach

SNAP is administered at the Federal level by staff members in a wide range of divisions, branches, and offices throughout FNS. FNS would be responsible on an ongoing basis to monitor, oversee, and provide technical assistance to ADSEF to ensure SNAP is operating effectively and according to regulations. FNS would also be responsible for authorizing and monitoring retailers in Puerto Rico. This would require FNS to fund additional FTE staff positions at the National Office, MARO, and CAO.

To estimate ongoing administrative costs to FNS, the study team used a building-up approach, as was used for SNAP implementation labor costs. The team identified labor categories needed to support the ongoing work and estimated the amount of time each labor category would need to spend supporting SNAP administration on an ongoing basis. For each labor category, the team estimated the cost of one FTE was equal to—

*(Annual Salary + Fringe Benefits + Overhead) * Inflation*

The study team assumed the following FTE allocations:

- The National Office would need 14 additional FTE staff to support oversight of Puerto Rico's SNAP, including 11 staff to support retailer authorization and investigations.
- MARO would require two additional FTE staff to support QC reviews and two additional FTE staff to support Spanish language and program operations.
- CAO would require one additional staff to provide oversight and support to ADSEF.

Table 8.11 presents the costs estimates for these FTE staff.

Table 8.11. Annual FNS Labor Costs for Ongoing SNAP Administration (in 2031 Dollars)

FNS Office	Number of FTE	Average Estimated 2031 FTE Costs	Annual Cost
FNS National Office	14	203,244	2,845,409
FNS MARO	4	195,213	780,852
FNS CAO	1	201,193	201,193
Total	**19**	**-**	**3,827,456**

Note: CAO = Caribbean Area Office; FTE = full-time equivalent; MARO = Mid-Atlantic Regional Office

3. Ongoing FNS Contractor Cost Approach

In addition to salary costs, FNS would incur additional costs for conducting retailer inspections and investigations in Puerto Rico. Using cost data from the FY 2021 store inspection and investigation contract inflated to 2031 dollars, the study team estimates authorizations and inspections would cost

$182 per visit. The team assumed FNS would conduct 700 authorizations per year, for an annual cost of $127,400 (table 8.12). Similarly, the FY 2021 per-visit investigation costs were projected to 2031 dollars to estimate that each investigation visit would cost $251. Because investigations involve five visits on average, the cost per investigation would be $1,255. The team assumed FNS would conduct 1,500 retailer investigations per year in Puerto Rico, for an annual cost of $1.9 million (table 8.12).

Table 8.12. Total Annual FNS Operating Costs (in 2031 Dollars)

Cost Category	Annual Cost
FNS labor costs	3,827,456
Retailer authorization or compliance (700 visits)	127,400
Retailer inspections (1,500 investigations)	1,882,500
Total	**5,837,356**

4. Benefit Cost Estimate Approach

The final component of ongoing SNAP costs are the costs of the SNAP benefits themselves. Estimating the costs of benefits is challenging given the benefits paid in 2031 would depend on the number and composition of households participating in 2031—a number that cannot be estimated with precision considering the number of economic and policy factors that can change before then. Eligibility and participation levels depend in part on the gross and net income thresholds to be used in Puerto Rico, and the benefit levels depend on the value of the Thrifty Food Plan. Neither of these have been determined for Puerto Rico.

Within these caveats, FNS estimates annual benefit costs in 2031 would range between $4.0 billion and $5.1 billion in Puerto Rico. Both estimates assume the average monthly number of participating households would be 861,000. The lower estimate—$4.0 billion—is derived using average household benefits for the 48 States and the District of Columbia. The higher estimate assumes the average household benefits in Puerto Rico would be the same as in the U.S. Virgin Islands. To estimate total annual ongoing costs, FNS assumed the benefit costs would be equal to $4.5 billion (the midpoint in the range).

5. Estimated Total Annual Costs of SNAP in Puerto Rico

Once implemented, total annual SNAP costs would be approximately $4.7–$4.9 billion per year, depending on Puerto Rico's salary scale (table 8.13). Of these costs, approximately $115–$192 million are administrative costs that would be borne by Puerto Rico; the remainder of the administrative costs (54 percent) and all the benefit costs would be funded by the Federal Government. As stated previously, these costs would be sensitive to several factors that could change in the 10-year period it would take to implement SNAP. Factors such as economic conditions, policy changes, demographic shifts, and other factors could lead the actual annual costs to be significantly higher or lower than these estimates.

Table 8.13. Estimated Annual Costs for Ongoing SNAP Administration and Benefits (in 2031 Dollars)

Cost Category	Puerto Rico	Federal Government	Total
Assuming FY 2021 Puerto Rico Salaries Plus Inflation			
Administrative costs for Puerto Rico	114,566,606	128,647,457	243,214,063
Administrative costs for FNS	0	5,837,356	5,837,356
Subtotal SNAP administrative costs	114,566,606	134,484,812	249,051,418

Cost Category	Puerto Rico	Federal Government	Total
Benefit costs	0	4,500,000,000	4,500,000,000
Total SNAP Administration and Benefits Annual Costs	**114,566,606**	**4,634,484,812**	**4,749,051,418**
Assuming 75 Percent Increase in Puerto Rico Salaries			
Administrative costs for Puerto Rico	192,143,342	215,661,267	407,804,609
Administrative costs for FNS	0	5,837,356	5,837,356
Subtotal SNAP administrative costs	192,143,342	221,498,623	413,641,965
Benefit costs	0	4,500,000,000	4,500,000,000
Total SNAP Administration and Benefits Annual Costs	**192,143,342**	**4,721,498,623**	**4,913,641,965**

D. NAP and SNAP Cost Comparisons

Implementing SNAP in Puerto Rico would require a significant increase in Federal funds over the $2.0 billion block grant in place for NAP in FY 2021 (table 8.14).[41] The Federal Government's portion of potential SNAP funding in Puerto Rico is estimated to be $3.8 billion in 2021 dollars, or $4.6 billion in 2031 dollars, assuming Puerto Rico salaries are only adjusted for inflation. Although Puerto Rico would not be expected to contribute funds to cover benefit costs, Puerto Rico's costs for program administration for SNAP would more than double, from $40 million in FY 2021 for NAP to $95 million in 2021 dollars, or $115 million in 2031 dollars.

Table 8.14. Comparison of Administrative and Benefit Costs for NAP and SNAP in Puerto Rico

Funding Entity	Administrative Costs for Puerto Rico[a]	Benefit Costs	Total Administrative and Benefits Annual Costs
Budgeted NAP Costs (FY 2021)			
Puerto Rico	40,059,544	-	40,059,544
Federal Government	40,059,544	1,997,991,956	2,038,051,500
Total	**80,119,088**	**1,997,991,956**	**2,078,111,044**
Estimated SNAP Costs (2021 Dollars)			
Puerto Rico	94,673,253	-	94,673,253
Federal Government	112,286,280	3,716,997,523	3,829,283,802
Total	**206,959,533**	**3,716,997,523**	**3,923,957,055**
Estimated SNAP Costs (2031 Dollars)			
Puerto Rico	114,566,606	-	114,566,606
Federal Government	128,647,457	4,500,000,000	4,628,647,457
Total	**243,214,063**	**4,500,000,000**	**4,743,214,063**

[a] – Note that administrative costs for the FNS National Office and MARO are not included in this table. The Federal Government rows of this table represent the Federal share of the administrative costs incurred in Puerto Rico.

[41] The Puerto Rico NAP block was increased by 23 percent in FY 2022 to match similar increases in SNAP benefit amounts that went into effect for FY 2022 driven by the new Thrifty Food Plan.

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Appendix A. FNS and ADSEF Organizational Charts

Figure A.1. FNS Organizational Chart

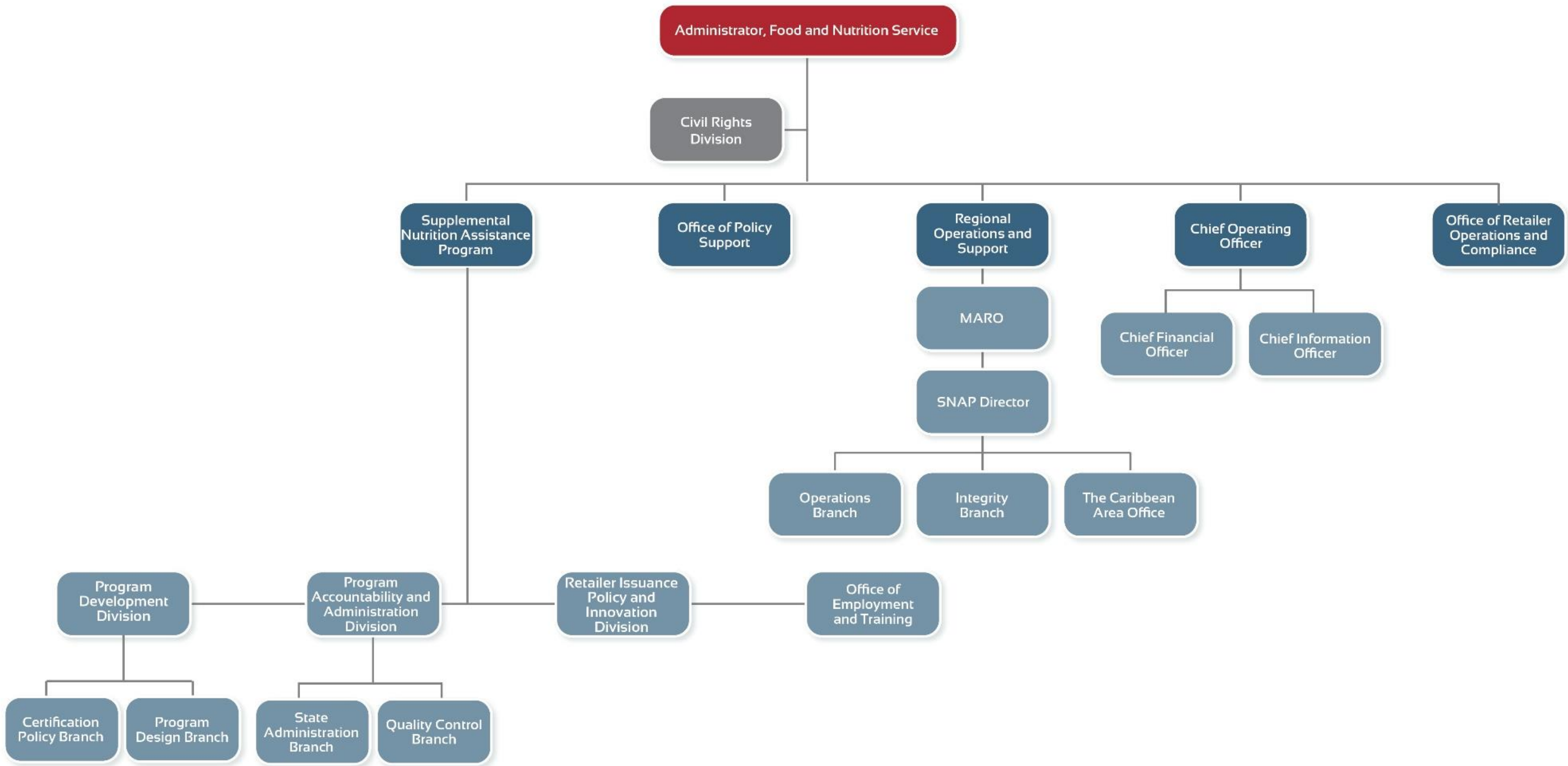
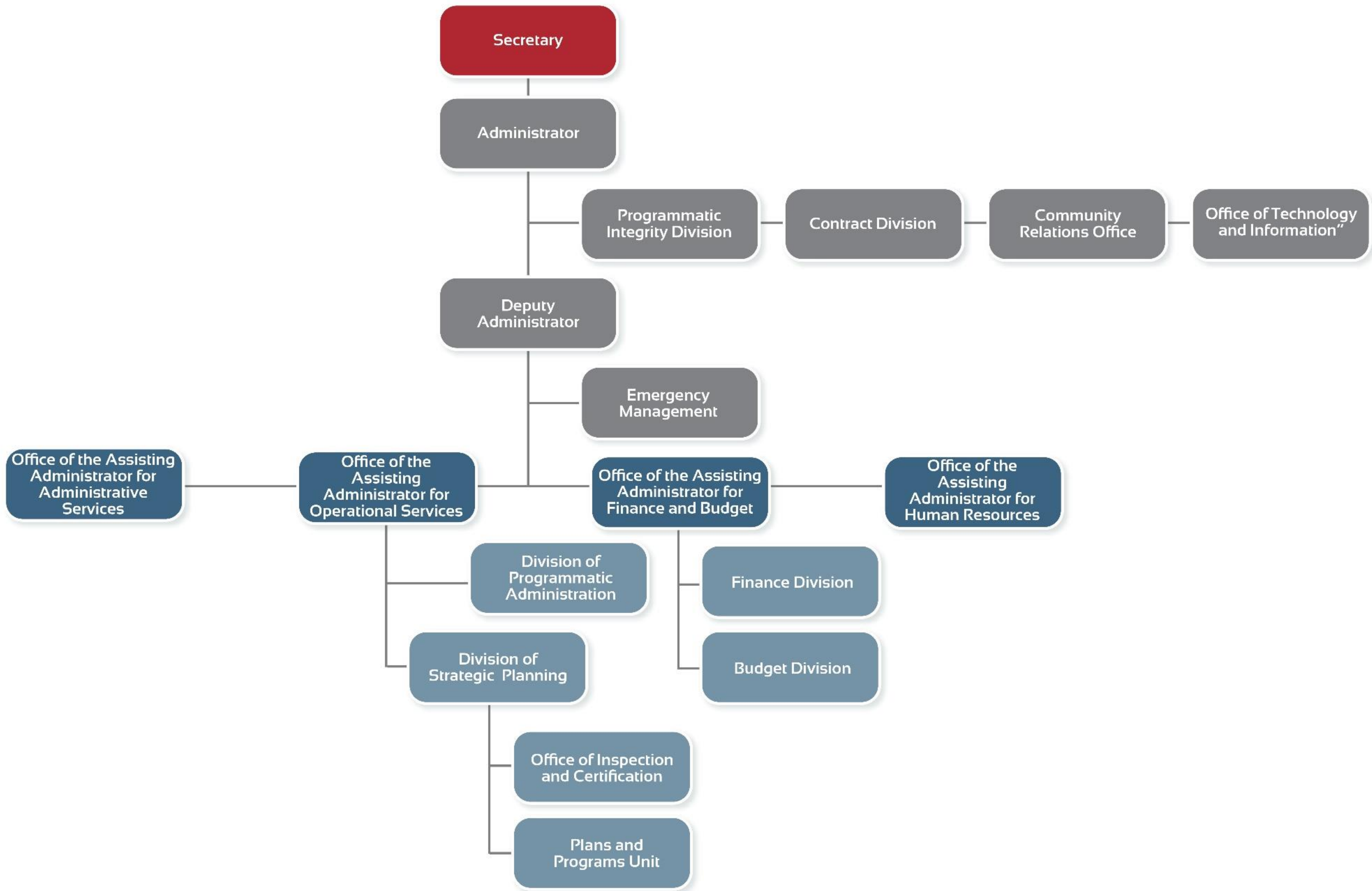


Figure A.2. ADSEF Organizational Chart



Appendix B. Detailed Description of Microsimulation Methodology

This appendix describes the technical approach used to estimate the Supplemental Nutrition Assistance Program (SNAP) participation under a transition from the Nutrition Assistance Program (NAP) to SNAP in Puerto Rico. The approach involved modeling a simplified version of SNAP eligibility rules using demographic, income, and shelter expense data from the 2019 Puerto Rico Community Survey (PRCS) and assumptions for the likely participation rate among eligible households. The SNAP participation estimates were used as an input to the administrative cost model.

To estimate SNAP eligibility, the study team developed a microsimulation model composed of a database and coded rules of SNAP to simulate what a caseworker does—that is, the model forms assistance units from households and applies the eligibility rules to determine whether each household unit in the database is eligible for the program (Newman & Scherpf, 2013). This appendix describes the database, the approach used to model SNAP eligibility rules, and assumptions for the participation rate. It also includes tables illustrating the distribution of SNAP-eligible household units by their characteristics (tables B.1 and B.2) and tables showing SNAP eligibility parameter values used in the model (tables B.3, B.4, B.5, and B.6).

A. Database

The study team used the 2019 PRCS 1-year Public Use Microdata Sample (PUMS) as the underlying database for the microsimulation model. The 2019 PRCS includes detailed income, shelter expense, and demographic information on 1,206,348 Puerto Rico households (and the individuals within those households).[42] However, the PRCS does not contain information necessary to simulate all aspects of SNAP eligibility. For example, it does not contain information on which individuals purchase and prepare food together or how individuals unrelated to the household head are related to each other. The PRCS does not contain information on every type of expense allowed for deductions or asset balances. The disability indicators on the PRCS are generally less restrictive than the definition of disability under SNAP. Finally, income measures on the PRCS are annual rather than monthly. The assumptions or proxy measures used to account for missing information to determine SNAP eligibility are discussed in the next section. Note that changes in the methods or criteria used to determine SNAP eligibility could result in different outcomes.

B. Modeling SNAP Eligibility Rules

To estimate a range in SNAP participation, SNAP eligibility was modeled under two scenarios:

1. **Scenario 1: Federal SNAP rules.** This version uses standard Federal SNAP eligibility rules used in the continental United States. The gross income limit is 130 percent of the Federal Poverty Guidelines, and the net income limit is 100 percent of the poverty guidelines. Households with elderly members or individuals with disabilities are not subject to the gross income limit. Federal SNAP rules also include a limit on assets such as the value of cash in bank accounts and vehicles. The model uses the gross and net income limits for the 48 States, District of Columbia (DC), Guam, and the U.S. Virgin Islands, and deduction parameters are used for the 48 States and DC.

[42] The 2019 PRCS data are the most recent PRCS PUMS data available from the U.S. Census Bureau. The 2020 PRCS PUMS data will not be released as a result of the COVID-19 pandemic (U.S. Census Bureau, 2021).

2. **Scenario 2: Broad-based categorical eligibility (BBCE) rules.** This version uses BBCE rules under the option adopted by most States. While BBCE rules vary by State, the model uses a gross income limit of 200 percent of the Federal Poverty Guidelines and no asset test. However, eligible households must qualify for a positive benefit based on net income.

Eligibility workers must determine gross and net income under the Federal and BBCE rules (net income is required under BBCE to determine whether a household qualifies for a positive benefit amount and the amount of the benefit). Thus, except for the asset test and income thresholds used, the modeling process and assumptions were similar under both scenarios. The following text discusses how SNAP eligibility was modeled given the limitations of the PRCS data and identifies differences in assumptions or parameters used under the Federal and BBCE rules.

1. SNAP Unit Formation

A SNAP unit is defined as an individual living alone or individuals who live together and customarily purchase and prepare food together. Generally, a group of individuals who live together in a residential unit but do not purchase and prepare food together may apply as separate household units; their income and countable resources are considered separately in eligibility and benefit determinations. However, spouses living together must apply together, and parents must apply with their children younger than 22 if they live in the same household (even if the children have spouses or children of their own).

Modeling approach. The PRCS does not provide information on which individuals purchased and prepared food together or how individuals unrelated to the household head were related to one another. To estimate SNAP unit formation in the model, families and subfamilies were assumed to form separate units in most cases while adhering to the mandatory rules for unit formation in SNAP. For example, children younger than 22 always formed a unit with their parent(s), if present. Individuals aged 22 or older who were living with their parent(s) or adult sibling and in a subfamily[43] were assumed to form their own separate SNAP unit.[44] Unrelated adults also formed their own units.

For this analysis, the study team assumed Puerto Rico would seek a waiver of time limits on eligibility for able-bodied adults without dependents (ABAWDs) between ages 18 and 49; therefore, ABAWDs were not excluded from SNAP units.

[43] The PRCS defines subfamilies as a married couple living in the same household with or without children under 18 or a single parent with children under 18. A subfamily does not maintain its own household but lives in a household where the household head or household head's spouse is a relative. Some subfamilies are identified during processing of the data by the Census Bureau using available information such as family names. For modeling purposes, additional subfamilies were built by attempting to pair children under 18 with adults at least 15 years older. For example, the model placed nieces and nephews of the household head into subfamilies with an adult brother or sister of the head, grandchildren of the head with a child of the head, other related children with another related adult, and unrelated children with an unrelated adult.

[44] Individuals aged 22 or older who live with their parent(s) or adult sibling *but not in a subfamily* are randomly assigned to form their own SNAP unit 50 percent of the time. If all members of a subfamily are under 18 and a parent is not present, the subfamily members would be combined with the household head. If the oldest subfamily member is aged 18–21 and a parent is not present, the subfamily remains its own unit.

2. Identification of Eligible Noncitizens

Key groups of permanent resident noncitizens who are eligible for SNAP benefits include the following (Cronquist, 2021):[45]

- Individuals who have lived in the United States as a qualified alien for 5 years or more from the date of entry
- Qualified alien children younger than 18
- Blind or disabled individuals receiving government benefits for their condition
- Noncitizens who are members of the U.S. Armed Forces, veterans, or their dependents
- Lawful permanent residents with 40 qualifying quarters of work history
- Individuals aged 65 or older and lawfully residing in the United States on August 22, 1996
- Individuals admitted as refugees or granted asylum or a stay of deportation

Modeling approach. The PRCS identifies noncitizens but does not identify if noncitizens are permanent residents, nor does it identify those who entered as refugees or asylees. For modeling purposes, the study team included the following groups of noncitizens as eligible: (1) noncitizens who had lived in the United States for 5 years or more; (2) noncitizens under age 18; (3) noncitizens identified as disabled; and (4) noncitizens with a military connection (veteran or on active duty and family members).[46] All remaining noncitizens were identified as ineligible noncitizens. All ineligible noncitizens were removed from the unit, and their income was prorated across the remaining members.

3. Identification of Individuals With Disabilities

For SNAP eligibility purposes, an individual is generally considered disabled based on receipt of Federal disability benefits, including SSI and other disability payments.[47] Individuals who are disabled or elderly are often treated differently than others when determining SNAP eligibility. For example, under Federal SNAP rules, individuals who are disabled (or elderly) are not subject to the gross income test, have a higher asset limit, and are allowed a higher amount of shelter expenses that can be deducted. Under BBCE rules, individuals who are disabled or elderly are allowed a higher amount of shelter expenses that can be deducted.

Modeling approach. Because most SNAP households with disabled members receive SSI, receipt of SSI is often used as a proxy for receipt of disability benefits for SNAP eligibility. However, because Puerto Rico does not have an SSI program, the study team could not use receipt of SSI as a proxy. The PRCS has a general disability indicator based on difficulties with six specific functions (self-care, hearing, vision, cognition, ambulation, and independent living). SNAP disability, which is based on receipt of Federal disability benefits, is more restrictive than the general disability indicator in the PRCS. To better approximate the definition of disability used in SNAP, the study team created a new indicator of SNAP

[45] For a comprehensive list of all SNAP-eligible noncitizen categories, see 7 CFR § 273.4 Citizenship and alien status: https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-C/part-273#273.4.

[46] Lawful permanent residents with 40 qualifying quarters of work history and individuals aged 65 or older and lawfully residing in the United States on August 22, 1996, are assumed to be captured under the category of noncitizens who have lived in the United States for 5 years or more.

[47] A person is considered to be disabled for SNAP eligibility purposes if they receive Federal or State disability or blindness payments or other disability retirement benefits from a government agency under the Social Security Act, including Supplemental Security Income (SSI) or Social Security disability or blindness payments; receive an annuity under the Railroad Retirement Act and are (1) eligible for Medicare or (2) considered to be disabled based on SSI rules; are a veteran who is totally disabled, permanently housebound, or in need of regular aid and attendance; or are permanently disabled and receiving veterans' benefits as a surviving spouse or child of a veteran (Cronquist, 2021).

disability using PRCS data. Specifically, individuals were counted as disabled if they (1) had Social Security, SSI, or Veteran's disability income or participated in Medicare;[48] (2) were between the ages of 18 and 61; and (3) had difficulty with at least one of the six functions included in the general PRCS disability indicator. This indicator more closely identifies a population that would be considered disabled for SNAP eligibility purposes.

4. Determination of Categorical Eligibility

Under SNAP, household units in which all members receive cash benefits from SSI, TANF, or General Assistance are categorically eligible for SNAP. Known as pure public assistance (PA) households, these household units are not subject to SNAP income and asset limits.[49]

Modeling approach. The study team assigned categorical eligibility to units in which members received cash benefits from TANF or General Assistance. Because Puerto Rico does not have an SSI program, SSI was not included in the definition of public assistance income. This pure PA categorical eligibility was used in both versions of the model.

5. Definition of Gross and Net Income

Income is the most important determinant of a household's SNAP eligibility. The PRCS reports annual income from the 12 months prior to the interview, resulting in income amounts that largely represent 2 calendar years. The PRCS then includes an average income adjustment factor to compensate for the different reference periods. On average, the adjusted annual incomes reflect December 2018. The PRCS also includes an adjustment factor to adjust annualized shelter and utility expenses to reflect December 2018. As a result, fiscal year (FY) 2019 SNAP eligibility parameters are appropriate for the reference periods used in the data.

- **Gross income.** Annual gross income was defined as the sum of seven types of personal income reported in the PRCS: wage or salary income; net self-employment income; interest, dividends, or net rental income; Social Security or Railroad Retirement income; public assistance cash income; retirement, survivor, or disability pensions; and any other sources of income, including unemployment compensation, Veteran's payments, and alimony and child support.[50] A prorated share of the income of SNAP unit members who were ineligible because of their noncitizenship status was included in the total income for the unit.
- **Net income.** Annual net income was defined as gross income minus the standard deduction, the earned income deduction (20 percent of earnings), and excess shelter expense deduction (shelter costs that exceed 50 percent of income after all other potential deductions are subtracted from gross income). The shelter deduction has a limit for units without elderly or disabled members, but units with elderly or disabled members can take the full value of shelter costs that exceed 50 percent of adjusted income. Because the PRCS provides no data on dependent care expenses, medical expenses, or child support payments, deductions for these expenses were not included in the estimates.

[48] Although Puerto Rico does not have an SSI program, the model used reported SSI income as an indicator of disability (it would have been SSI received from the States) because the SSI would not have been received unless the individual was disabled, likely long term.
[49] This categorical eligibility for pure PA household units does not include BBCE policies under which States may choose to confer categorical eligibility for SNAP on households that receive a noncash TANF-funded benefit or a Maintenance of Effort-funded benefit. The BBCE policies are used only in the BBCE scenario.
[50] Gross income includes all reported income on the PRCS, except for SSI because Puerto Rico does not have an SSI program.

Modeling approach. The study team adjusted all FY 2019 monthly income threshold values to be in annual dollars for comparison with annual income reported in the PRCS. The team made similar adjustments to ensure all deductible expenses and thresholds were in annual values to be consistent with the reference periods used in the PRCS data.

- To meet Federal SNAP income limits, eligible SNAP units without an elderly or disabled member must have gross countable income no greater than 130 percent of the Federal Poverty Guidelines, and all eligible units must have net countable income no greater than 100 percent of the Federal Poverty Guidelines. The study team used the FY 2019 SNAP gross monthly income limits (times 12) and the FY 2019 SNAP net monthly income limits (times 12) used for the continental United States, DC, Guam, and the U.S. Virgin Islands (see section F). For the deduction amounts, the study team used the FY 2019 standard deductions and maximum shelter deduction (times 12) used for the continental United States and DC (see section F).[51] Households that are categorically eligible are not subject to income or asset limits.
- To meet BBCE SNAP income limits, eligible SNAP units must have gross countable income no greater than 200 percent of the Federal Poverty Guidelines.[52] The study team used 200 percent of the FY 2019 monthly poverty guidelines (times 12) used for the continental United States, DC, Guam, and the U.S. Virgin Islands (see section F). Eligible household units must also qualify for a positive benefit, as determined by net income.[53] For the deduction amounts, the study team used the FY 2019 standard deduction and maximum shelter deduction (times 12) used for the continental United States and DC (see section F). Households that are categorically eligible are not subject to income limits.

6. Determination of Asset Balances

The PRCS does not contain information on the financial assets of household members nor the value of vehicles available to the household. The Federal SNAP asset limit in FY 2019 for eligible SNAP units without an elderly or disabled member was $2,250; for eligible SNAP units with an elderly or disabled member, the asset limit was $3,500. There is no asset limit under BBCE rules used in the model.

Simulation approach. Although the PRCS provides no information on financial asset balances, it does have information on reported income from interest and dividends received from savings, bonds, or stocks. The study team used interest and dividend income to estimate the value of asset balances that produced the income. The team used the average interest rate on U.S. Treasury securities, which was 2.455 percent in December 2018 (U.S. Treasury, 2021). Reported annual income from assets among all household unit members was divided by 0.02455 to calculate asset balances on which the interest income was based. The results were compared with the appropriate asset limit to determine asset

[51] Although it is anticipated Puerto Rico would use standard utility allowances for determining shelter expenses, the study team used reported utility costs for modeling purposes because the PRCS uses a gross rent variable that combines rent and utilities into a single amount. The Census Bureau created the combined gross rent variable to reduce the complexities associated with differing practices on how utilities and fuels are included in the rental payment.

[52] Under BBCE rules, eligible SNAP units must have gross countable income no greater than the gross income limit of the noncash TANF program or Maintenance of Effort-funded benefit used to confer categorical eligibility. While BBCE rules vary by State, the assumption used for BBCE in the model is a gross income limit of 200 percent of the Federal Poverty Guidelines.

[53] The study team used the net income test as a proxy for receiving a positive benefit because there is no benefit algorithm in the model. If a household's net income is too high to qualify for a SNAP benefit, the household is considered ineligible.

eligibility under the Federal rules. Because most States exclude all vehicles from the asset test, the model assumed all vehicles were excluded from the asset test under SNAP in Puerto Rico.[54]

C. Applying SNAP Rules to Determine Eligibility

Based on the approach and assumptions outlined above, the study team identified household units in the PRCS as eligible for SNAP if—

- Under Federal SNAP rules—
  - Unit is identified as categorically eligible, or
  - Gross income is ≤ 130 percent of the FY 2019 Federal Poverty Guidelines by unit size used for the continental United States, Guam, and the U.S. Virgin Islands (for units with no elderly or disabled members), and
  - Net income is ≤ 100 percent of the FY 2019 Federal Poverty Guidelines by unit size used for the continental United States, Guam, and the U.S. Virgin Islands (for all units), and
  - Estimated asset balance is ≤ $2,250 for units with no elderly or disabled members or ≤ $3,500 for units with at least one elderly or disabled member
- Under BBCE rules—
  - Unit is identified as categorically eligible, or
  - Gross income is ≤ 200 percent of the FY 2019 Federal Poverty Guidelines by unit size used for the continental United States, Guam, and the U.S. Virgin Islands, and
  - Unit would be eligible for a positive SNAP benefit as determined by net income

D. Estimating Percentage of Eligible Units That Would Participate in SNAP

To estimate the percentage of eligible household units likely to participate in SNAP, the study team used assumed participation rates. The team considered several assumptions for the participation rate to derive a low, medium, and high estimate of the percentage of eligible units that would participate under SNAP:

- **Low estimate** assumes a participation rate equal to the overall rate in the United States in FY 2019 (83.4 percent for eligible units, 82.0 percent for individuals in eligible units) (Lauffer & Vigil, 2021).
- **Midlevel estimate** assumes all eligible units with no income or with only unearned income, such as Social Security, would participate in SNAP; assumes 71.0 percent of units with income from earnings (and 73.5 percent of individuals) would participate, based on the participation rate among households and individuals with earnings in the United States (Lauffer & Vigil, 2021).
- **High estimate** assumes all eligible units would participate.

[54] In FY 2019, more than half of all States and territories had adopted rules that exclude all vehicles from the resource test, and most others adopted rules that exclude the value of additional vehicles (Cronquist, 2021). Although the team considered using the number of vehicles per household as a proxy for assets (e.g., households with three or more vehicles would be considered asset ineligible), this proxy seemed overly restrictive given the high level of poverty in Puerto Rico.

The study team selected the midlevel participation rate estimate, resulting in an overall net participation rate of 89.6 percent among all household units under Federal SNAP rules and 89.2 percent under BBCE rules. The participation rate estimates were applied to the aggregate number of eligible households identified by the model by relevant subgroup (i.e., eligible units with no income or only unearned income and eligible units with income from earnings).

E. Results for SNAP-Eligible Household Units

The body of the implementation plan presents the results for estimated SNAP participation. This appendix section provides the results for estimated SNAP eligibility. The counts and distribution of SNAP-eligible household units reflect what the population would look like if all the eligible units chose to participate.[55] Results are shown for both Federal SNAP rules (table B.1) and BBCE rules (table B.2). For example, under BBCE rules, considered the most likely approach for determining SNAP eligibility in Puerto Rico, 23.5 percent of all eligible household units were estimated to have zero income, 37.4 percent had income from earnings, 38.0 percent included elderly members, and 84.1 percent had income at or below the Federal Poverty Guidelines.

Table B.1. Microsimulation Results for SNAP-Eligible Units in Puerto Rico, 2019 Based on Federal SNAP Rules

Household Characteristics	SNAP-Eligible Units	Percent of Total
Total SNAP-eligible units	935,817	100.0
Unit of size 1	529,576	56.6
Unit of size 2	218,758	23.4
Unit of size 3	99,828	10.7
Unit of size 4	64,502	6.9
Unit of size 5	18,865	2.0
Unit of size 6 or more	4,288	0.5
Average unit size	1.76	N/A
SNAP-eligible units with—		
Zero income	226,736	24.2
Income from earnings	335,859	35.9
No income from earnings	599,958	64.1
Elderly	363,032	38.8
Individuals with disabilities	77,436	8.3
Children	211,644	22.6
SNAP-eligible units by income as a percentage of poverty guidelines		
≤ 100 percent of poverty guideline	805,300	86.1
> 100 percent of poverty guideline	130,517	13.9

Note: The 2019 PRCS-based microsimulation model provides estimates of the number of household units that would be eligible for SNAP on average in 2019.
N/A = not applicable; PRCS = Puerto Rico Community Survey
Source: 2019 PRCS-based microsimulation model and assumed participation rates

[55] Because participation rates are applied to aggregate totals of SNAP-eligible household units (outside of the model), the distribution of SNAP participating households by subgroup characteristics cannot be tabulated.

Table B.2. Microsimulation Results for SNAP-Eligible Units in Puerto Rico, 2019 Based on BBCE Rules

Household Characteristics	SNAP-Eligible Units	Percent of Total
Total SNAP-eligible units	965,456	100.0
Unit of size 1	547,920	56.8
Unit of size 2	224,410	23.2
Unit of size 3	102,738	10.6
Unit of size 4	66.515	6.9
Unit of size 5	19,466	2.0
Unit of size 6 or more	4,407	0.5
Average unit size	1.76	NA
SNAP-eligible units with—		
Zero income	226,736	23.5
Income from earnings	360,656	37.4
No income from earnings	604,800	62.6
Elderly	367,090	38.0
Individuals with disabilities	78,254	8.1
Children	217,593	22.5
SNAP-eligible units by income as a percentage of Federal poverty Guidelines		
≤ 100 percent of poverty guideline	811,559	84.1
> 100 percent of poverty guideline	153,897	15.9

Note: The 2019 PRCS-based microsimulation model provides estimates of the number of household units that would be eligible for SNAP on average during 2019.
BBCE = broad-based categorical eligibility; N/A = not applicable; PRCS = Puerto Rico Community Survey
Source: 2019 PRCS-based microsimulation model and assumed participation rates

F. Income Eligibility Standards, Standard Deductions, and Maximum Excess Shelter Deductions for FY 2019

This section includes tables of gross and net income eligibility standards (tables B.3 and B.4), standard deductions (table B.5), and maximum excess shelter deductions (table B.6) used for Federal SNAP rules and BBCE rules in FY 2019. Note that because the PRCS provides annual income amounts, monthly income eligibility standards and deductions were multiplied by 12 to annualize the values for the microsimulation model.

Table B.3. Fiscal Year 2019 Gross and Net Monthly Income Eligibility Standards (SNAP Federal Rules)

Unit Size	48 States; Washington, DC; Guam; U.S. Virgin Islands	
	Gross Monthly Limits (130 Percent of Federal Poverty Guidelines, $)	Net Monthly Limits (100 Percent of Federal Poverty Guidelines, $)
1	1,316	1,012
2	1,784	1,372
3	2,252	1,732
4	2,720	2,092
5	3,188	2,452

Unit Size	48 States; Washington, DC; Guam; U.S. Virgin Islands	
	Gross Monthly Limits (130 Percent of Federal Poverty Guidelines, $)	Net Monthly Limits (100 Percent of Federal Poverty Guidelines, $)
6	3,656	2,812
7	4,124	3,172
8	4,592	3,532
Each additional member	468	360

Source: USDA FNS, 2021a

Table B.4. Fiscal Year 2019 Gross Monthly Income Eligibility Standards (BBCE Rules)

Unit Size	48 States; Washington, DC; Guam; U.S. Virgin Islands
	Gross Monthly Limits (200 Percent of Federal Poverty Guidelines, $)
1	2,024
2	2,744
3	3,464
4	4,184
5	4,904
6	5,624
7	6,344
8	7,064
Each additional member	720

Note: BBCE = broad-based categorical eligibility
Source: USDA FNS, 2021a

Table B.5. Fiscal Year 2019 Monthly Standard Deductions

Area	Standard Deductions Unit Size ($)			
	1–3	4	5	6+
48 States and DC	164	174	204	234

Source: USDA FNS, 2021a

Table B.6. Fiscal Year 2019 Monthly Maximum Excess Shelter Deduction

Area	Shelter Deduction ($)
48 States and DC	552

Source: USDA FNS, 2021a

Appendix C. Detailed Cost Model Data

This appendix presents key assumptions and calculations used in generating the cost estimates presented in chapter 8.

Table C.1 presents the roles key staff are expected to play during the 10-year implementation period for SNAP.

Table C.1. Implementation Roles for ADSEF Staff, ADSEF Consultants, and FNS Staff

Staff Position	Year 1–6	Year 7–9	Year 10
ADSEF			
ADSEF administrator*	Provide high-level oversight for SNAP implementation	Provide high-level oversight for SNAP implementation	Provide general oversight for SNAP implementation and participate in communications campaign on SNAP rollout
Assistant administrator*	Provide general oversight on revising NAP regulations to comply with SNAP requirements and lead all aspects of design process	Provide leadership on all aspects of planning process, including oversight of steering committee and consultants and development of SNAP State Plan of Operations	Provide general oversight on all aspects of rollout process, including training and piloting systems
NAP directors, executive directors (6)*	Work closely with consultants on implementation design and coordinate with ADSEF operations staff for input on policy and program decisions; participate in State Exchanges	Work closely with consultants on implementation design and coordinate with ADSEF operations staff for input on planning and drafting policies, procedures, and other required materials; create a hiring plan and make decisions on need for additional office space	Work closely on coordinating testing of new systems and training staff on SNAP, all aspects of eligibility determination and benefit issuance process, and changes to systems throughout ADSEF
Administrative support (office assistant)	Provide administrative support to steering committee and leadership	Provide administrative support to steering committee and leadership	Provide administrative support to steering committee and leadership
Associate director, social and family assistance (10, one from each region)	Provide perspective on regional/local office operations during SNAP design	Serve as liaison to steering committee, provide perspective on regional/local office operations	Instrumental in rolling out SNAP to regional and local offices, including transitioning all NAP participants to SNAP and certifying the first wave of NAP nonparticipants in SNAP; work with training consultant on trainings throughout the region; participant communications campaign

Staff Position	Year 1–6	Year 7–9	Year 10
HR specialist	None	Develop a detailed plan for recruitment and onboarding of new staff	Recruitment and hiring of new staff
HR analyst	None	None	Recruitment and hiring of new staff
Legal affairs director	Provide legal expertise on revisions to regulations, policies, contracts, procurements, as needed	Provide legal expertise on revisions to regulations, policies, contracts, procurements, as needed	Provide legal expertise on revisions to regulations, policies, contracts, procurements, as needed
Procurement	Support procurement for IT and contractors	Support procurement for IT and contractors	Support procurement for IT, contractors, space, technology, etc.
Finance director	Work with steering committee and consultants as needed to provide guidance on financial implications of policy changes	Work with steering committee and consultants as needed to provide financial guidance on planning for SNAP implementation, including procurements; conduct a gap analysis to identify changes needed to meet SNAP reporting requirements	Oversee changes needed to current NAP financial reports to comply with SNAP reporting requirements
Budget director	Budget planning	Prepare a budget for SNAP as part of State Plan of Operations	Transition to SNAP
Fiscal assistant	Financial planning	Financial planning	Make changes needed to current NAP financial reports to comply with SNAP reporting requirements
SNAP data systems and policy expert (2)	As part of the steering committee, provide guidance on State agency-level data systems and operations and workflows	Provide guidance on the APD process and the procurement and development of data systems	Provide guidance on completing the APD process
Data systems project coordinator (7)	Manage the development of data systems	Manage the development of data systems	Manage the development of data systems
Eligibility supervisors	Serve on steering committee to provide knowledge of local office staff, procedures, client interactions, and resources	Serve on steering committee to provide frontline knowledge	Serve on steering committee
Consultants			
SNAP policy consultant (full time)*	Provide SNAP administration subject matter expertise as committee makes program design decisions and drafts program materials	Provide SNAP administration subject matter expertise on decisions related to implementation planning, including communications campaign, staffing needs, detailed workplan	Provide SNAP administration subject matter expertise on decisions related to rollout, including development of trainings on SNAP and materials required for communication to staff, retailers, participants

Staff Position	Year		
	1 2 3 4 5 6	7 8 9	10
SNAP policy consultant (ad hoc)	None	Provide specific consulting services as needed (QC, initial issuance of benefits to new and existing participants, SNAP-Ed)	Provide specific consulting services as needed
IT data systems manager*	Develop business requirements and technical specifications to guide systems development	Oversee systems changes/systems development; complete APD process	Finalize systems and systems training plans
IT consultant*	Work with IT data systems manager to develop plan for ensuring all necessary systems would be in place for SNAP operation	Work with IT data systems manager on the implementation of plan for ensuring all necessary systems would be in place for SNAP operation	Work with IT data systems manager on systems testing and coordinating with NAP operations
Statistician	Update caseload projections	Update caseload projections	Develop and test QC sampling plan
FNS			
SNAP associate administrator	Provide high-level oversight for SNAP implementation in Puerto Rico	Provide high-level oversight for SNAP implementation in Puerto Rico	Provide high-level oversight for SNAP implementation in Puerto Rico
National Office project manager	Coordinate all aspects of SNAP implementation	Coordinate all aspects of SNAP implementation	Coordinate all aspects of SNAP implementation
National Office SNAP policy and Puerto Rico expert	Serve as general subject matter expert on SNAP policy and operations issues to the FNS task force and Puerto Rico steering committee, as needed	Serve as general subject matter expert on SNAP policy and operations issues to the FNS task force and Puerto Rico steering committee, as needed	Serve as general subject matter expert on SNAP policy and operations issues to the FNS task force and Puerto Rico steering committee, as needed
MARO lead	Oversee and coordinate technical assistance provided to ADSEF and Federal regulations development	Oversee and coordinate technical assistance provided to ADSEF and approval of planning documents such as State Plan of Operations	Oversee and coordinate technical assistance provided to ADSEF and Federal regulations development
MARO CAO Lead	Serve as primary liaison between FNS and ADSEF throughout planning process	Serve as primary liaison between FNS and ADSEF throughout the planning process	Serve as primary liaison between FNS and ADSEF throughout rollout process
MARO QC team: MARO QC branch chief MARO Puerto Rico team lead* MARO QC reviewer MARO QC trainer	Provide technical assistance that prepares ADSEF for program integrity planning and operations	Provide continued support in the implementation of QC system	Review QC plans and initial QC reviews; train Puerto Rico QC reviewers and supervisors on rules and procedures for SNAP investigations

Staff Position	Year		
	1 2 3 4 5 6	7 8 9	10
ROC branch chief (2)	Work with ADSEF to produce initial communications materials to NAP-authorized vendors and other retailers to alert them to the change and provide timelines for applying for SNAP authorization and obtaining SNAP EBT equipment	Prepare to authorize and manage retailers in Puerto Rico	Work with ADSEF to test procedures for receiving information about SNAP households and benefit issuance to support investigations into retailer program violations
ROC programmatic analyst (6; 2 per branch)	Provide guidance for retailer management policies	Support planning for authorizing and managing retailers	Support communications and technical assistance to retailers; authorize retailers
RIPID programmatic analyst	Provide guidance for retailer management policies	Support planning for authorizing and managing retailers	Support communications and technical assistance to retailers
SNAP subject matter experts (8)*	Provide technical assistance and guidance to Puerto Rico and update FNS policies and procedures to prepare for ongoing oversight of SNAP in Puerto Rico	Provide technical assistance and guidance to Puerto Rico and update FNS policies and procedures to prepare for ongoing oversight of SNAP in Puerto Rico	Provide technical assistance and guidance to Puerto Rico and update FNS policies and procedures to prepare for ongoing oversight of SNAP in Puerto Rico
SSO	Provide support and guidance to ADSEF throughout SNAP data systems development	Provide technical assistance on completing APD process	Provide technical assistance on completing APD process
RIPID branch chief	Oversee transition of retailer management from ADSEF to FNS	Oversee transition of retailer management from ADSEF to FNS	Oversee transition of retailer management from ADSEF to FNS
Financial manager	Provide technical assistance on SNAP financial reporting requirements and changes needed for compliance	Provide technical assistance to ADSEF to update reporting processes and work to prepare to receive SNAP reports from Puerto Rico	Update the National Data Bank to accommodate Puerto Rico's data; work with ADSEF to ensure correct reports can be submitted correctly and on time

Note: * steering committee member
APD = Advance Planning Document; ADSEF = Administración de Desarrollo Socioeconómico de la Familia (Administration for the Socioeconomic Development of the Family); CAO = Caribbean Area Office; HR = human resources; EBT = electronic benefit transfer; IT = information technology; MARO = Mid-Atlantic Regional Office; QC = Quality Control; RIPID = Retailer and Issuance Policy and Innovation Division; ROC = Retailer Operations and Compliance; SNAP-Ed = SNAP Nutrition Education and Obesity Prevention Services grant program; SSO = State Systems Office

Table C.2 presents the FTE time each staff level is estimated to spend each year of the implementation period.

Table C.2. FTE Assumptions for Staff and Consultants by Implementation Year

Staff	Year									
	1	2	3	4	5	6	7	8	9	10
ADSEF										
ADSEF administrator	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.15	0.20	0.25
Assistant administrator	0.20	0.20	0.20	0.25	0.25	0.25	0.25	0.25	0.25	0.50
NAP directors, executive directors (6)	3.00	3.00	3.00	3.00	3.00	3.00	3.00	4.00	6.00	6.00
Administrative support (office assistant)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Associate directors, social and family assistance (10)	0.00	1.00	0.00	0.00	0.00	0.00	1.00	1.00	2.00	2.50
HR specialist	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.15	2.00	2.00
HR analyst	0.00	0.00	0.00	0.00	0.00	0.00	0.10	0.15	2.00	2.00
Legal affairs director	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.15	0.20	0.15
Procurement	0.10	0.10	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15
Finance director	0.10	0.10	0.00	0.00	0.00	0.00	0.00	0.15	0.15	0.15
Budget director	0.10	0.10	0.00	0.00	0.00	0.00	0.00	0.15	0.15	0.15
Fiscal assistant	0.50	0.50	0.10	0.10	0.10	0.10	0.50	0.75	1.00	1.00
Eligibility supervisors	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
Data systems project coordinators (7)	7.00	7.00	7.00	7.00	7.00	7.00	7.00	7.00	7.00	7.00
SNAP data systems and policy expert (2)	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00
Consultants										
SNAP policy consultant (full time)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
SNAP policy consultant (ad hoc)	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15
IT data systems manager	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
IT consultant	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25
Statistician	0.00	0.00	0.25	0.25	0.00	0.00	0.00	0.00	0.25	0.25

Staff	Year									
	1	2	3	4	5	6	7	8	9	10
FNS										
MARO lead	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MARO QC branch chief	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.25	0.25	0.25
MARO QC trainer	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.25	0.25	0.25
ROC programmatic analyst (6)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.00	6.00
RIPID programmatic analyst	0.00	0.00	0.00	0.20	0.20	0.20	0.20	1.00	1.00	2.00
NO SNAP policy specialists	0.25	0.25	0.25	0.25	0.25	0.25	0.25	1.00	1.00	1.00
SSO (1 full time)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
ROC branch chief (2)	0.20	0.20	0.00	0.00	0.10	0.10	0.10	0.10	0.20	0.20
RIPID branch chief	0.20	0.20	0.00	0.00	0.10	0.10	0.10	0.10	0.20	0.20
MARO CAO	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MARO QC reviewer	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.50
MARO QC PR team lead	0.00	0.00	1.00	1.00	1.00	0.00	0.00	1.00	1.00	1.00
NO project manager	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
NO SNAP policy and PR expert	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
SNAP SMEs (8)	4.00	4.00	2.00	2.00	2.00	2.00	2.00	4.00	4.00	6.00
SNAP associate administrator	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05
Financial manager	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05

Note: ADSEF = Administración de Desarrollo Socioeconómico de la Familia (Administration for the Socioeconomic Development of the Family); CAO = Caribbean Area Office; HR = human resources; IT = information technology; MARO = Mid-Atlantic Regional Office; NO = National Office; PR = Puerto Rico; QC = Quality Control; RIPID = Retailer and Issuance Policy and Innovation Division; ROC = Retailer Operations and Compliance; SME = subject matter expert

Table C.3 presents the FTE time each staff level is estimated to spend for training on SNAP policies and procedures.

Table C.3. Full-Time Equivalent for ADSEF Staff, Consultants, and FNS Staff for SNAP Training

Staff	Number of Staff Trained	Hours of Training (Year 10)	Full-Time Equivalent
ADSEF			
ADSEF administrator	1	80	0.04
Assistant administrator	1	80	0.04
NAP director, executive directors (3)	10	80	0.38
Administrative support (office assistant)	1	80	0.04
Associate directors, social and family assistance (10)	10	160	0.77
HR specialist	1	80	0.04
HR analyst	1	80	0.04
Legal affairs director	1	80	0.04
Procurement	1	80	0.04
Finance director	1	80	0.04
Budget director	1	80	0.04
Fiscal assistant	1	80	0.04
Eligibility supervisors	204	160	15.67
Eligibility workers	1500	160	115.38
QC managers	1	160	0.08
QC supervisors	2	160	0.15
QC reviewers	10	160	0.77
Fraud manager	1	160	0.08
Fraud supervisors	3	160	0.23
Fraud investigators	15	160	1.15
Administrative staff (HR, legal, finance, etc.)	435	60	12.55
Consultants			
Eligibility worker trainers	N/A	N/A	6.00
FNS			
MARO QC trainer	N/A	N/A	0.50

Note: ADSEF = Administración de Desarrollo Socioeconómico de la Familia (Administration for the Socioeconomic Development of the Family); HR = human resources; MARO = Mid-Atlantic Regional Office; QC = Quality Control

Table C.4 presents the salary assumptions used for all staff each year of implementation. Salary estimates are "fully loaded" with fringe benefit, overhead, and inflation costs.

Table C.4. Fully Loaded Salary Estimates by Implementation Year and Position (in Dollars)

Staff	Base Salary	Year									
		1	2	3	4	5	6	7	8	9	10
ADSEF											
ADSEF administrator	90,996	117,189	119,451	121,756	124,106	126,502	128,943	131,432	133,968	136,554	139,189
Assistant administrator	60,572	79,976	81,519	83,093	84,696	86,331	87,997	89,696	91,427	93,191	94,990
NAP director, executive directors (6)	44,472	60,283	61,446	62,632	63,841	65,073	66,329	67,609	68,914	70,244	71,600
Administrative support (office assistant)	16,020	25,482	25,973	26,475	26,986	27,506	28,037	28,578	29,130	29,692	30,265
Associate director, social and family assistance (10) (RO)	43,464	59,050	60,190	61,351	62,535	63,742	64,973	66,227	67,505	68,808	70,136
HR specialist	51,120	68,415	69,735	71,081	72,453	73,851	75,276	76,729	78,210	79,719	81,258
HR analyst	26,430	38,215	38,952	39,704	40,470	41,251	42,048	42,859	43,686	44,529	45,389
Legal affairs director	66,000	86,615	88,287	89,991	91,728	93,498	95,302	97,142	99,017	100,928	102,876
Procurement	30,325	42,979	43,808	44,654	45,516	46,394	47,290	48,202	49,133	50,081	51,047
Finance director	39,252	53,898	54,938	55,999	57,079	58,181	59,304	60,448	61,615	62,804	64,016
Budget director	36,648	50,713	51,692	52,689	53,706	54,743	55,799	56,876	57,974	59,093	60,233
Fiscal assistant	23,868	35,081	35,758	36,448	37,152	37,869	38,600	39,344	40,104	40,878	41,667
Eligibility supervisors	31,920	44,930	45,797	46,681	47,582	48,500	49,436	50,390	51,363	52,354	53,365
Eligibility workers	20,316	30,736	31,330	31,934	32,551	33,179	33,819	34,472	35,137	35,815	36,506
QC managers	48,131	64,759	66,009	67,283	68,581	69,905	71,254	72,629	74,031	75,460	76,916
QC supervisors	38,505	52,984	54,007	55,049	56,112	57,195	58,299	59,424	60,571	61,740	62,931
QC reviewers	30,804	43,565	44,406	45,263	46,136	47,027	47,934	48,859	49,802	50,764	51,743
Fraud manager	48,131	64,759	66,009	67,283	68,581	69,905	71,254	72,629	74,031	75,460	76,916
Fraud supervisors	38,505	52,984	54,007	55,049	56,112	57,195	58,299	59,424	60,571	61,740	62,931
Fraud investigators	30,804	43,565	44,406	45,263	46,136	47,027	47,934	48,859	49,802	50,764	51,743
Administrative staff (HR, legal, finance, etc.)	25,586	37,183	37,901	38,632	39,378	40,138	40,912	41,702	42,507	43,327	44,163
Data systems project coordinators (7)	36,648	50,713	51,692	52,689	53,706	54,743	55,799	56,876	57,974	59,093	60,233
SNAP data systems and policy expert (2)	43,464	59,050	60,190	61,351	62,535	63,742	64,973	66,227	67,505	68,808	70,136

Staff	Base Salary	Year									
		1	2	3	4	5	6	7	8	9	10
Consultants											
SNAP policy consultant (full time)	260,000	270,905	276,133	281,462	286,895	292,432	298,076	303,828	309,692	315,669	321,762
SNAP policy consultant (ad hoc)	208,000	217,901	222,106	226,393	230,763	235,216	239,756	244,383	249,100	253,907	258,808
IT data systems manager	260,000	270,905	276,133	281,462	286,895	292,432	298,076	303,828	309,692	315,669	321,762
IT consultant	100,000	107,817	109,897	112,018	114,180	116,384	118,630	120,920	123,254	125,632	128,057
Statistician	156,000	164,897	168,080	171,324	174,630	178,001	181,436	184,938	188,507	192,145	195,854
Eligibility worker trainers	208,000	217,901	222,106	226,393	230,763	235,216	239,756	244,383	249,100	253,907	258,808
FNS											
MARO lead	134,141	183,635	187,180	190,792	194,475	198,228	202,054	205,953	209,928	213,980	218,110
MARO QC branch chief	134,141	183,635	187,180	190,792	194,475	198,228	202,054	205,953	209,928	213,980	218,110
MARO QC trainer	113,517	156,307	159,324	162,398	165,533	168,728	171,984	175,303	178,687	182,135	185,651
ROC programmatic analyst	120,972	166,185	169,393	172,662	175,994	179,391	182,853	186,382	189,980	193,646	197,384
RIPID programmatic analyst	120,972	166,185	169,393	172,662	175,994	179,391	182,853	186,382	189,980	193,646	197,384
NO SNAP policy specialists	120,972	166,185	169,393	172,662	175,994	179,391	182,853	186,382	189,980	193,646	197,384
SSO	114,498	157,607	160,649	163,749	166,909	170,131	173,414	176,761	180,173	183,650	187,194
ROC branch chief (2)	163,345	222,333	226,624	230,998	235,457	240,001	244,633	249,354	254,167	259,072	264,072
RIPID branch chief	163,345	222,333	226,624	230,998	235,457	240,001	244,633	249,354	254,167	259,072	264,072
MARO CAO	123,402	169,405	172,675	176,007	179,404	182,867	186,396	189,994	193,661	197,398	201,208
MARO QC reviewer	113,517	156,307	159,324	162,398	165,533	168,728	171,984	175,303	178,687	182,135	185,651
MARO QC PR team lead	117,516	161,606	164,725	167,904	171,145	174,448	177,815	181,246	184,744	188,310	191,944
NO project manager	117,516	161,606	164,725	167,904	171,145	174,448	177,815	181,246	184,744	188,310	191,944
NO SNAP policy and PR expert	138,866	189,897	193,562	197,297	201,105	204,986	208,943	212,975	217,086	221,275	225,546
SNAP SMEs (8)	138,866	189,897	193,562	197,297	201,105	204,986	208,943	212,975	217,086	221,275	225,546
SNAP associate administrator	170,800	232,212	236,694	241,262	245,918	250,664	255,502	260,433	265,460	270,583	275,805
Financial manager	138,866	189,897	193,562	197,297	201,105	204,986	208,943	212,975	217,086	221,275	225,546
Retailer authorization contract (per store)	150	153	156	159	162	165	168	171	175	178	182
Retailer investigation contract (per pass)	207	211	215	219	223	228	232	237	241	246	251

Note: ADSEF = Administración de Desarrollo Socioeconómico de la Familia (Administration for the Socioeconomic Development of the Family); CAO = Caribbean Area Office; IT = information technology; MARO = Mid-Atlantic Regional Office; NO = National Office; PR = Puerto Rico; QC = Quality Control; RIPID = Retailer and Issuance Policy and Innovation Division; RO = Regional Office; SME = subject matter expert; SSO = State Systems Office

Table C.5 presents the estimated implementation costs by staff and by year for the 10-year implementation period. Implementation costs include FTE staff and consultant assumptions for implementing SNAP in Puerto Rico and estimated costs for each staff level for training on SNAP policies and procedures.

Table C.5. Implementation Costs by Staff and by Year (in Dollars)

Staff	Year										Total
	1	2	3	4	5	6	7	8	9	10	
ADSEF											
ADSEF administrator	11,719	11,945	12,176	12,411	12,650	12,894	13,143	20,095	27,311	40,151	174,495
Assistant administrator	15,995	16,304	16,619	21,174	21,583	21,999	22,424	22,857	23,298	51,148	233,400
NAP director, executive directors (6)	180,849	184,339	187,897	191,523	195,220	198,988	202,828	275,657	421,465	457,138	2,495,904
Administrative support (office assistant)	25,482	25,973	26,475	26,986	27,506	28,037	28,578	29,130	29,692	31,429	279,289
Associate directors, social and family assistance (10)	-	60,190	-	-	-	-	66,227	67,505	137,615	229,289	560,825
HR specialist	6,841	6,973	7,108	7,245	7,385	7,528	7,673	11,732	159,439	165,641	387,566
HR analyst	-	-	-	-	-	-	4,286	6,553	89,059	92,523	192,421
Legal affairs director	8,662	8,829	8,999	9,173	9,350	9,530	9,714	14,852	20,186	19,388	118,682
Procurement	4,298	4,381	6,698	6,827	6,959	7,093	7,230	7,370	7,512	9,620	67,990
Finance director	5,390	5,494	-	-	-	-	-	9,242	9,421	12,065	41,611
Budget director	5,071	5,169	-	-	-	-	-	8,696	8,864	11,352	39,152
Fiscal assistant	17,540	17,879	3,645	3,715	3,787	3,860	19,672	30,078	40,878	43,269	184,324
Eligibility supervisors	4,493	4,580	4,668	4,758	4,850	4,944	5,039	5,136	5,235	841,534	885,237
Eligibility workers	-	-	-	-	-	-	-	-	-	4,212,285	4,212,285
QC managers	-	-	-	-	-	-	-	-	-	5,917	5,917
QC supervisors	-	-	-	-	-	-	-	-	-	9,682	9,682
QC reviewers	-	-	-	-	-	-	-	-	-	39,803	39,803

Staff	Year										Total
	1	2	3	4	5	6	7	8	9	10	
Fraud manager	-	-	-	-	-	-	-	-	-	5,917	5,917
Fraud supervisors	-	-	-	-	-	-	-	-	-	14,523	14,523
Fraud investigators	-	-	-	-	-	-	-	-	-	59,704	59,704
Administrative staff (HR, legal, finance, etc.)	-	-	-	-	-	-	-	-	-	554,165	554,165
Data systems project coordinators (7)	354,991	361,842	368,826	375,944	383,200	390,595	398,134	405,818	413,650	421,634	3,874,632
SNAP data systems and policy experts (2)	118,100	120,379	122,703	125,071	127,485	129,945	132,453	135,009	137,615	140,271	1,289,032
Subtotal	**759,431**	**834,277**	**765,812**	**784,827**	**799,974**	**815,414**	**917,402**	**1,049,730**	**1,531,240**	**7,468,447**	**15,726,554**
Consultants											
SNAP policy consultant (full time)	270,905	276,133	281,462	286,895	292,432	298,076	303,828	309,692	315,669	321,762	2,956,854
SNAP policy consultant (ad hoc)	32,685	33,316	33,959	34,614	35,282	35,963	36,657	37,365	38,086	38,821	356,750
IT data systems manager	270,905	276,133	281,462	286,895	292,432	298,076	303,828	309,692	315,669	321,762	2,956,854
IT consultant	26,954	27,474	28,005	28,545	29,096	29,658	30,230	30,813	31,408	32,014	294,198
Statistician	-	-	42,831	43,658	-	-	-	-	48,036	48,963	183,488
Eligibility worker trainers	-	-	-	-	-	-	-	-	-	1,552,847	1,552,847
Subtotal	**601,448**	**613,056**	**667,719**	**680,606**	**649,242**	**661,772**	**674,544**	**687,563**	**748,869**	**2,316,170**	**8,300,991**
FNS											
MARO lead	183,635	187,180	190,792	194,475	198,228	202,054	205,953	209,928	213,980	218,110	2,004,334
MARO QC branch chief	-	-	-	-	-	-	-	52,482	53,495	54,527	160,504
MARO QC trainer	-	-	-	-	-	-	-	44,672	45,534	139,238	229,443
ROC programmatic analyst (6)	-	-	-	-	-	-	-	-	193,646	1,184,301	1,377,948

Staff	Year										Total
	1	2	3	4	5	6	7	8	9	10	
RIPID programmatic analyst	-	-	-	35,199	35,878	36,571	37,276	189,980	193,646	394,767	923,317
NO SNAP policy specialists	41,546	42,348	43,166	43,999	44,848	45,713	46,596	189,980	193,646	197,384	889,225
SSO	157,607	160,649	163,749	166,909	170,131	173,414	176,761	180,173	183,650	187,194	1,720,237
ROC branch chief (2)	44,467	45,325	-	-	24,000	24,463	24,935	25,417	51,814	52,814	293,236
RIPID branch chief	44,467	45,325	-	-	24,000	24,463	24,935	25,417	51,814	52,814	293,236
MARO CAO	169,405	172,675	176,007	179,404	182,867	186,396	189,994	193,661	197,398	201,208	1,849,016
MARO QC reviewer	-	-	-	-	-	-	-	-	-	92,825	92,825
MARO QC PR team lead	-	-	167,904	171,145	174,448	-	-	184,744	188,310	191,944	1,078,495
NO project manager	161,606	164,725	167,904	171,145	174,448	177,815	181,246	184,744	188,310	191,944	1,763,887
NO SNAP policy and PR expert	189,897	193,562	197,297	201,105	204,986	208,943	212,975	217,086	221,275	225,546	2,072,672
SNAP SMEs (8)	759,586	774,246	394,595	402,210	409,973	417,885	425,951	868,343	885,102	1,353,276	6,691,167
SNAP associate administrator	11,611	11,835	12,063	12,296	12,533	12,775	13,022	13,273	13,529	13,790	126,727
Financial manager	9,495	9,678	9,865	10,055	10,249	10,447	10,649	10,854	11,064	11,277	103,634
Subtotal	**1,773,321**	**1,807,546**	**1,523,342**	**1,587,942**	**1,666,589**	**1,520,940**	**1,550,294**	**2,590,752**	**2,886,214**	**4,762,963**	**21,669,903**
Other Direct Costs											
Travel	5,000	5,000	20,000	5,000	5,000	5,000	5,000	20,000	20,000	20,000	110,000
Translation	75,000	-	-	-	-	-	-	75,000	75,000	75,000	300,000
Communications campaign	-	-	-	-	-	100,000	250,000	400,000	400,000	13,500,000	14,650,000
Retailer authorization	-	-	-	-	-	-	-	-	-	853,511	853,511
Subtotal	**80,000**	**5,000**	**20,000**	**5,000**	**5,000**	**105,000**	**255,000**	**495,000**	**495,000**	**14,448,511**	**15,913,511**
Total	**3,214,200**	**3,259,880**	**2,976,874**	**3,058,375**	**3,120,805**	**3,103,126**	**3,397,240**	**4,823,045**	**5,661,324**	**28,996,091**	**61,610,960**

Note: ADSEF = Administración de Desarrollo Socioeconómico de la Familia (Administration for the Socioeconomic Development of the Family); CAO = Caribbean Area Office; HR = human resources; IT = information technology; MARO = Mid-Atlantic Regional Office; NO = National Office; PR = Puerto Rico; QC = Quality Control; RO = Regional Office; SME = subject matter expert; SSO = State Systems Office

Table C.6. Estimating Ongoing Issuance Costs

State	2017	2018	2019	Average
Actual Cost Data ($)				
Georgia	4,510,580	4,371,824	4,025,338	4,302,581
Illinois	7,681,776	8,214,862	9,076,946	8,324,528
Massachusetts	2,537,308	2,662,138	2,231,776	2,477,074
Michigan	1,936,606	2,683,300	1,885,740	2,168,549
Pennsylvania	19,722,410	19,489,620	17,953,056	19,055,029
Washington	6,748,852	6,445,440	5,915,848	6,370,047
Average	**7,189,589**	**7,311,197**	**6,848,117**	**7,116,301**
Cost per Household ($)				
Georgia	6	6	7	6
Illinois	8	9	11	9
Massachusetts	6	6	5	6
Michigan	3	4	3	3
Pennsylvania	21	20	21	21
Washington	13	13	12	13
Average	**9**	**10**	**10**	**10**
Adjust Costs for Percent Driven by Labor (Cost per Household, $) *Assume the following percentage of costs in each State are labor costs: 90 percent* *Prorate labor portion by ratio of State 2021 salary to Puerto Rico 2021 salary*				
Georgia	4	4	4	4
Illinois	5	6	7	6
Massachusetts	4	4	4	4
Michigan	2	3	2	2
Pennsylvania	14	14	14	14
Washington	9	9	8	8
Average	**6**	**6**	**7**	**6**
Project Puerto Rico Costs ($)				
Georgia	3,414,824	3,468,808	3,748,455	3,544,029
Illinois	4,502,580	5,110,143	6,367,584	5,326,769
Massachusetts	3,257,937	3,378,572	3,070,239	3,235,583
Michigan	1,521,755	2,245,748	1,708,914	1,825,472
Pennsylvania	11,866,984	11,665,314	11,775,009	11,769,102
Washington	7,422,657	7,352,103	7,025,803	7,266,854
Average	**5,331,123**	**5,536,782**	**5,616,001**	**5,494,635**
Puerto Rico Costs if Staff Get Low Raise (35 Percent, $)				
Georgia	4,490,494	4,561,483	4,929,219	4,660,399
Illinois	5,920,893	6,719,838	8,373,373	7,004,701
Massachusetts	4,284,187	4,442,823	4,037,364	4,254,791
Michigan	2,001,108	2,953,159	2,247,222	2,400,496
Pennsylvania	15,605,084	15,339,888	15,484,136	15,476,369
Washington	9,760,794	9,668,016	9,238,931	9,555,914
Average	**7,010,427**	**7,280,868**	**7,385,041**	**7,225,445**

State	2017	2018	2019	Average
Puerto Rico Costs if Staff Get High Raise (75 Percent, $)				
Georgia	5,719,831	5,810,254	6,278,663	5,936,249
Illinois	7,541,821	8,559,490	10,665,704	8,922,338
Massachusetts	5,457,045	5,659,109	5,142,650	5,419,601
Michigan	2,548,940	3,761,628	2,862,431	3,057,666
Pennsylvania	19,877,198	19,539,402	19,723,140	19,713,246
Washington	12,432,950	12,314,773	11,768,220	12,171,981
Average	**8,929,631**	**9,274,109**	**9,406,801**	**9,203,514**

Table C.7. Estimating Ongoing Fraud Control Costs

State	2017	2018	2019	Average
Actual Cost Data ($)				
Georgia	6,847,634	6,757,876	6,519,808	6,708,439
Illinois	2,182,078	1,892,778	4,845,986	2,973,614
Massachusetts	3,702,278	3,108,804	2,912,108	3,241,063
Michigan	14,500,280	12,707,284	13,111,556	13,439,707
Pennsylvania	9,804,264	9,588,354	8,832,360	9,408,326
Washington	3,609,716	3,668,578	3,499,414	3,592,569
Average	**6,774,375**	**6,287,279**	**6,620,205**	**6,560,620**
Costs per Household ($)				
Georgia	9	9	11	10
Illinois	2	2	6	3
Massachusetts	8	7	7	7
Michigan	20	19	21	20
Pennsylvania	10	10	10	10
Washington	7	7	7	7
Average	**9**	**9**	**10**	**10**
Adjust Costs for Percent Driven by Labor (Cost per Household, $) *Assume the following percentage of costs in each State are labor costs: 90 percent* *Prorate labor portion by ratio of State 2021 salary to Puerto Rico 2021 salary*				
Georgia	6	6	7	6
Illinois	1	1	4	2
Massachusetts	6	5	5	5
Michigan	13	12	14	13
Pennsylvania	7	7	7	7
Washington	5	5	5	5
Average	**6**	**6**	**7**	**6**

State	2017	2018	2019	Average
Project Puerto Rico Costs ($)				
Georgia	5,184,138	5,362,013	6,071,343	5,539,165
Illinois	1,278,999	1,177,423	3,399,516	1,951,979
Massachusetts	4,753,774	3,945,445	4,006,167	4,235,129
Michigan	11,394,096	10,635,172	11,882,083	11,303,784
Pennsylvania	5,899,230	5,739,012	5,792,948	5,810,397
Washington	3,970,110	4,184,627	4,155,988	4,103,575
Average	**5,413,391**	**5,173,949**	**5,884,674**	**5,490,671**
Puerto Rico Costs if Staff Get Low Raise (35 Percent, $)				
Georgia	6,817,141	7,051,047	7,983,817	7,284,001
Illinois	1,681,883	1,548,311	4,470,364	2,566,853
Massachusetts	6,251,213	5,188,260	5,268,110	5,569,194
Michigan	14,983,236	13,985,252	15,624,939	14,864,476
Pennsylvania	7,757,488	7,546,801	7,617,726	7,640,672
Washington	5,220,694	5,502,785	5,465,124	5,396,201
Average	**7,118,609**	**6,803,743**	**7,738,347**	**7,220,233**
Puerto Rico Costs if Staff Get High Raise (75 percent, $)				
Georgia	8,683,431	8,981,371	10,169,500	9,278,101
Illinois	2,142,323	1,972,183	5,694,190	3,269,565
Massachusetts	7,962,571	6,608,621	6,710,330	7,093,841
Michigan	19,085,111	17,813,914	19,902,489	18,933,838
Pennsylvania	9,881,211	9,612,845	9,703,188	9,732,415
Washington	6,649,934	7,009,251	6,961,280	6,873,488
Average	**9,067,430**	**8,666,364**	**9,856,829**	**9,196,875**

Table C.8. Estimating Ongoing Automated Data Processing Development Costs

State	2017	2018	2019	Average
Actual Cost Data ($)				
Georgia	-	-	-	-
Illinois	945,190	1,251,834	870,422	1,022,482
Massachusetts	-	-	-	-
Michigan	-	-	-	-
Pennsylvania	738,520	415,486	-	577,003
Washington	-	-	2,042,520	2,042,520
Average	**841,855**	**833,660**	**1,456,471**	**1,043,995**
Costs per Household ($)				
Georgia	-	-	-	-
Illinois	1	1	1	1
Massachusetts	-	-	-	-
Michigan	-	-	-	-
Pennsylvania	1	0		1
Washington	-	-	4	4
Average	**1**	**1**	**3**	**1**

State	2017	2018	2019	Average
Adjust Costs for Percent Driven by Labor (Costs per Household, $) *Assume the following percentage of costs in each State are labor costs: 90 percent* *Prorate labor portion by ratio of State 2021 salary to Puerto Rico 2021 salary*				
Georgia	-	-	-	-
Illinois	1	1	1	1
Massachusetts	-	-	-	-
Michigan	-	-	-	-
Pennsylvania	1	0	-	0
Washington	-	-	3	3
Average	**1**	**1**	**2**	**1**
Project Puerto Rico Costs ($)				
Georgia	-	-	-	-
Illinois	554,012	778,717	610,611	647,780
Massachusetts	-	-	-	-
Michigan	-	-	-	-
Pennsylvania	444,368	248,685	-	346,526
Washington	-	-	2,425,746	2,425,746
Average	**499,190**	**513,701**	**1,518,179**	**843,690**
Puerto Rico Costs if Staff Get Low Raise (35 Percent, $)				
Georgia	-	-	-	-
Illinois	728,525	1,024,013	802,954	851,831
Massachusetts	-	-	-	-
Michigan	-	-	-	-
Pennsylvania	584,344	327,021	-	455,682
Washington	-	-	3,189,856	3,189,856
Average	**656,435**	**675,517**	**1,996,405**	**1,499,123**
Puerto Rico costs if Staff Get High Raise (75 Percent, $)				
Georgia	-	-	-	-
Illinois	927,970	1,304,351	1,022,774	1,085,031
Massachusetts	-	-	-	-
Michigan	-	-	-	-
Pennsylvania	744,316	416,547	-	580,432
Washington	-	-	4,063,124	4,063,124
Average	836,143	860,449	2,542,949	1,909,529

Table C.9. Estimating Ongoing Automated Data Processing Operations Costs

State	2017	2018	2019	Average
Actual Cost Data ($)				
Georgia	24,292,964	24,035,160	25,031,576	24,453,233
Illinois	-	-	-	-
Massachusetts	-	-	-	-
Michigan	31,096,980	24,168,726	36,678,064	30,647,923
Pennsylvania	28,708,330	35,308,376	40,974,206	34,996,971
Washington	16,391,896	15,591,366	19,575,662	17,186,308
Average	**25,122,543**	**24,775,907**	**30,564,877**	**26,821,109**
Costs per Household ($)				
Georgia	32	33	41	35
Illinois	-	-	-	-
Massachusetts	-	-	-	-
Michigan	43	35	58	45
Pennsylvania	30	37	47	38
Washington	31	31	41	34
Average	**3**	**34**	**47**	**38**
Adjust Costs for Percentage Driven by Labor (Costs per Household, $) *Assume the following percentage of costs in each State are labor costs: 90 percent* *Prorate labor portion by ratio of State 2021 salary to Puerto Rico 2021 salary*				
Georgia	21	22	27	24
Illinois	-	-	-	-
Massachusetts	-	-	-	-
Michigan	28	24	39	30
Pennsylvania	20	25	31	25
Washington	21	21	27	23
Average	**23**	**23**	**31**	**25**
Project Puerto Rico Costs ($)				
Georgia	18,391,472	19,070,612	23,309,781	20,257,288
Illinois	-	-	-	-
Massachusetts	-	-	-	-
Michigan	24,435,526	20,227,656	33,238,755	25,967,312
Pennsylvania	17,273,816	21,133,470	26,874,067	21,760,451
Washington	18,028,461	17,784,563	23,248,526	19,687,183
Average	**19,532,319**	**19,554,075**	**26,667,782**	**21,918,059**
Puerto Rico Costs if Staff Get Low Raise (35 Percent, $)				
Georgia	24,184,786	25,077,855	30,652,362	26,638,334
Illinois	-	-	-	-
Massachusetts	-	-	-	-
Michigan	32,132,717	26,599,367	43,708,963	34,147,016
Pennsylvania	22,715,068	27,790,513	35,339,398	28,614,993
Washington	23,707,426	23,386,700	30,571,812	25,888,646
Average	**25,684,999**	**25,713,609**	**35,068,134**	**28,822,247**

State	2017	2018	2019	Average
Puerto Rico Costs if Staff Get High Raise (75 Percent, $)				
Georgia	30,805,716	31,943,275	39,043,883	33,930,958
Illinois	-	-	-	-
Massachusetts	-	-	-	-
Michigan	40,929,506	33,881,324	55,674,915	43,495,248
Pennsylvania	28,933,642	35,398,563	45,014,062	36,448,756
Washington	30,197,673	29,789,143	38,941,282	32,976,032
Average	**32,716,634**	**32,753,076**	**44,668,535**	**36,712,749**

Table C.10. Estimating Ongoing SNAP Employment and Training Costs

State	2017	2018	2019	Average
Actual Cost Data ($)				
Georgia	2,808,674	3,924,378	3,166,420	3,299,824
Illinois	11,410,890	10,031,768	13,152,056	11,531,571
Massachusetts	4,204,220	5,023,206	4,353,812	4,527,079
Michigan	5,701,864	5,520,726	5,238,426	5,487,005
Pennsylvania	6,378,408	7,035,838	9,350,002	7,588,083
Washington	7,708,148	6,634,724	5,572,014	6,638,295
Average	**6,368,701**	**6,361,773**	**6,805,455**	**6,511,976**
Costs per Household ($)				
Georgia	4	5	5	5
Illinois	12	11	16	13
Massachusetts	9	11	10	10
Michigan	8	8	8	8
Pennsylvania	7	7	11	8
Washington	15	13	12	13
Average	**9**	**9**	**10**	**10**
Adjust Costs for Percent Driven by Labor (Costs per Household, $) *Assume the following percentage of costs in each State are labor costs: 90 percent* *Prorate labor portion by ratio of State 2021 salary to Puerto Rico 2021 salary*				
Georgia	2	4	3	3
Illinois	8	7	11	9
Massachusetts	6	7	7	7
Michigan	5	5	6	5
Pennsylvania	4	5	7	5
Washington	10	9	8	9
Average	**6**	**6**	**7**	**6**
Project Puerto Rico Costs ($)				
Georgia	2,126,363	3,113,784	2,948,618	2,729,588
Illinois	6,688,355	6,240,369	9,226,322	7,385,015
Massachusetts	5,398,274	6,375,051	5,989,510	5,920,945
Michigan	4,480,437	4,620,490	4,747,218	4,616,048
Pennsylvania	3,837,891	4,211,229	6,132,458	4,727,193
Washington	8,477,729	7,568,013	6,617,458	7,554,400
Average	**5,168,175**	**5,354,823**	**5,943,597**	**5,488,865**

State	2017	2018	2019	Average
Puerto Rico Costs if Staff Get Low Raise (35 Percent, $)				
Georgia	2,796,167	4,094,626	3,877,433	3,589,408
Illinois	8,795,187	8,206,085	12,132,613	9,711,295
Massachusetts	7,098,731	8,383,192	7,876,205	7,786,043
Michigan	5,891,774	6,075,944	6,242,591	6,070,103
Pennsylvania	5,046,827	5,537,767	8,064,182	6,216,258
Washington	11,148,213	9,951,938	8,701,957	9,934,036
Average	**6,796,150**	**7,041,592**	**7,815,830**	**7,217,857**
Puerto Rico Costs if Staff Get High Raise (75 Percent, $)				
Georgia	3,561,657	5,215,588	4,938,935	4,572,060
Illinois	11,202,995	10,452,618	15,454,089	12,369,901
Massachusetts	9,042,109	10,678,210	10,032,429	9,917,583
Michigan	7,504,731	7,739,320	7,951,590	7,731,880
Pennsylvania	6,428,468	7,053,809	10,271,866	7,918,048
Washington	14,200,196	12,676,422	11,084,242	12,653,620
Average	**8,656,693**	**8,969,328**	**9,955,525**	**9,193,849**

Table C.11. Estimating Ongoing Quality Control Costs (Estimated Based on Quality Control Sample)

State	2017	2018	2019	Average
Actual Cost Data ($)				
Georgia	2,378,406	2,463,660	2,367,530	2,403,199
Illinois	5,228,886	5,272,684	5,243,706	5,248,425
Massachusetts	2,450,126	2,585,620	2,548,028	2,527,925
Michigan	1,917,782	2,641,494	2,697,468	2,418,915
Pennsylvania	3,004,082	3,039,096	2,926,398	2,989,859
Washington	4,788,042	4,717,878	5,183,786	4,896,569
Average	**3,294,554**	**3,453,405**	**3,494,486**	**3,414,148**
Costs per Household (Costs per Sample ($)				
Georgia	2,407	2,464	2,527	2,466
Illinois	5,023	6,769	6,828	6,206
Massachusetts	2,531	2,663	2,688	2,627
Michigan	2,098	3,126	3,097	2,774
Pennsylvania	3,598	3,766	3,613	3,659
Washington	5,040	5,577	5,965	5,527
Average	**3,450**	**4,061**	**4,120**	**3,877**
Adjust Costs for Percent Driven by Labor (Costs per Sample, $) *Assume the following percentage of costs in each State are labor costs: 90 percent* *Prorate labor portion by ratio of State 2021 salary to Puerto Rico 2021 salary*				
Georgia	1,601	1,639	1,681	1,640
Illinois	3,341	4,502	4,541	4,128
Massachusetts	1,684	1,771	1,788	1,747
Michigan	1,396	2,079	2,060	1,845
Pennsylvania	2,393	2,505	2,403	2,434
Washington	3,352	3,709	3,968	3,676
Average	**2,294**	**2,701**	**2,740**	**2,578**

State	2017	2018	2019	Average
Project Puerto Rico Costs ($)				
Georgia	1,601,190	1,638,682	1,680,621	1,640,164
Illinois	3,340,968	4,502,028	4,541,413	4,128,136
Massachusetts	1,683,554	1,771,166	1,787,762	1,747,494
Michigan	1,395,619	2,079,250	2,059,928	1,844,933
Pennsylvania	2,392,981	2,504,868	2,403,047	2,433,632
Washington	3,352,341	3,709,285	3,967,721	3,676,449
Average	**2,294,442**	**2,700,880**	**2,740,082**	**2,578,468**
Project Puerto Costs if Staff Get Low Raise (35 Percent, $)				
Georgia	2,105,565	2,154,867	2,210,017	2,156,816
Illinois	4,393,373	5,920,167	5,971,958	5,428,499
Massachusetts	2,213,873	2,329,084	2,350,907	2,297,955
Michigan	1,835,239	2,734,214	2,708,805	2,426,086
Pennsylvania	3,146,770	3,293,901	3,160,007	3,200,226
Washington	4,408,329	4,877,710	5,217,554	4,834,531
Average	**3,017,191**	**3,551,657**	**3,603,208**	**3,390,686**
Project Puerto Costs if Staff Get High Raise (75 Percent, $)				
Georgia	2,681,994	2,744,792	2,815,040	2,747,275
Illinois	5,596,122	7,540,897	7,606,867	6,914,628
Massachusetts	2,819,952	2,966,704	2,994,502	2,927,053
Michigan	2,337,662	3,482,745	3,450,379	3,090,262
Pennsylvania	4,008,243	4,195,653	4,025,104	4,076,333
Washington	5,615,172	6,213,053	6,645,933	6,158,053
Average	**3,843,191**	**4,523,974**	**4,589,638**	**4,318,934**

C.12. Estimating Ongoing Fair Hearings Costs

State	2017	2018	2019	Average
Actual Cost Data ($)				
Georgia	341,083	1,201,308	550,916	697,769
Illinois	356,604	408,348	389,848	384,933
Massachusetts	1,563,354	3,079,144	2,837,348	2,493,282
Michigan	1,017,168	-	-	1,017,168
Pennsylvania	-	-	-	-
Washington	495,295	1,020,832	1,021,994	846,040
Average	**754,701**	**1,427,408**	**1,200,027**	**1,127,378**
Costs per Household ($)				
Georgia	0	2	1	1
Illinois	0	0	0	0
Massachusetts	4	7	7	6
Michigan	1	-	-	1
Pennsylvania	-	-	-	-
Washington	1	2	2	2
Average	**1**	**3**	**3**	**2**

State	2017	2018	2019	Average
Adjust Costs for Percentage Driven by Labor (Costs per Household, $) *Assume the following percentage of costs in each State are labor costs: 90 percent* *Prorate labor portion by ratio of State 2021 salary to Puerto Rico 2021 salary*				
Georgia	0	1	1	1
Illinois	0	0	0	0
Massachusetts	2	5	5	4
Michigan	1	-	-	1
Pennsylvania	-	-	-	-
Washington	1	1	1	1
Average	**1**	**2**	**2**	**1**
Project Puerto Rico Costs ($)				
Georgia	258,224	953,174	513,021	574,806
Illinois	209,019	254,017	273,483	245,506
Massachusetts	2,007,367	3,907,803	3,903,320	3,272,830
Michigan	799,275	-	-	799,275
Pennsylvania	-	-	-	-
Washington	544,745	1,164,430	1,213,745	974,307
Average	**763,726**	**1,569,856**	**1,475,892**	**1,269,825**
Puerto Rico Costs if Staff Get Low Raise (35 Percent, $)				
Georgia	339,564	1,253,423	674,623	755,870
Illinois	274,860	334,033	359,630	322,841
Massachusetts	2,639,688	5,138,761	5,132,866	4,303,772
Michigan	1,051,046	-	-	1,051,046
Pennsylvania	-	-	-	-
Washington	716,340	1,531,225	1,596,074	1,281,213
Average	**1,004,300**	**2,064,361**	**1,940,798**	**1,542,948**
Puerto Rico costs if Staff Get High Raise (75 Percent, $)				
Georgia	432,525	1,596,566	859,311	962,800
Illinois	350,107	425,479	458,084	411,223
Massachusetts	3,362,340	6,545,570	6,538,062	5,481,991
Michigan	1,338,785	-	-	1,338,785
Pennsylvania	-	-	-	-
Washington	912,448	1,950,420	2,033,022	1,631,963
Average	**1,279,241**	**2,629,509**	**2,472,120**	**1,965,353**

Table C.13. Estimating Ongoing Management Evaluations Costs

State	2017	2018	2019	Average
Actual Cost Data ($)				
Georgia	1,317,224	1,538,294	1,552,496	1,469,338
Illinois	-	-	-	-
Massachusetts	-	-	-	-
Michigan	1,506,244	977,820	848,594	1,110,886
Pennsylvania	14,693,876	1,389,886	1,256,762	5,780,175
Washington	3,665,324	5,976,338	3,373,686	4,338,449
Average	**5,295,667**	**2,470,585**	**1,757,885**	**3,174,712**

State	2017	2018	2019	Average
Costs per Household ($)				
Georgia	2	2	3	2
Illinois	-	-	-	-
Massachusetts	-	-	-	-
Michigan	2	1	1	2
Pennsylvania	15	1	1	6
Washington	7	12	7	9
Average	**7**	**4**	**3**	**5**
Adjust Costs for Percentage Driven by Labor (Costs per Household, $) *Assume the following percentage of costs in each State are labor costs: 90 percent* *Prorate labor portion by ratio of State 2021 salary to Puerto Rico 2021 salary*				
Georgia	1	1	2	1
Illinois	-	-	-	-
Massachusetts	-	-	-	-
Michigan	1	1	1	1
Pennsylvania	10	1	1	4
Washington	5	8	5	6
Average	**4**	**3**	**2**	**3**
Project Puerto Rico Costs ($)				
Georgia	997,231	1,220,554	1,445,708	1,221,164
Illinois	-	-	-	-
Massachusetts	-	-	-	-
Michigan	1,183,583	818,372	769,021	923,659
Pennsylvania	8,841,312	831,902	824,282	3,499,166
Washington	4,031,270	6,817,014	4,006,671	4,951,651
Average	**3,763,349**	**2,421,960**	**1,761,420**	**2,648,910**
Puerto Rico Costs if Staff Get Low Raise (35 Percent, $)				
Georgia	1,311,358	1,605,028	1,901,106	1,605,831
Illinois	-	-	-	-
Massachusetts	-	-	-	-
Michigan	1,556,412	1,076,159	1,011,263	1,214,611
Pennsylvania	11,626,326	1,093,951	1,083,931	4,601,403
Washington	5,301,119	8,964,373	5,268,772	6,511,422
Average	**4,948,804**	**3,184,878**	**2,316,268**	**3,483,317**
Puerto Rico costs if Staff Get High Raise (75 Percent, $)				
Georgia	1,670,361	2,044,428	2,421,560	2,045,450
Illinois	-	-	-	-
Massachusetts	-	-	-	-
Michigan	1,982,502	1,370,773	1,288,110	1,547,128
Pennsylvania	14,809,198	1,393,436	1,380,673	5,861,102
Washington	6,752,377	11,418,498	6,711,173	8,294,016
Average	**6,303,610**	**4,056,784**	**2,950,379**	**4,436,924**

Table C.14. Estimating Ongoing Nutrition Education Costs

State	2017	2018	2019	Average
Actual Cost Data ($)				
Georgia	7,456,467	9,011,261	9,252,999	8,573,576
Illinois	13,789,585	14,703,710	15,270,480	14,587,925
Massachusetts	4,706,690	5,345,129	5,597,861	5,216,560
Michigan	22,300,326	21,261,195	21,544,670	21,702,064
Pennsylvania	22,605,922	22,579,522	23,458,110	22,881,18
Washington	9,509,276	9,623,986	9,605,733	9,579,665
Average	**13,394,711**	**13,754,134**	**14,121,642**	**13,756,829**
Costs per Household ($)				
Georgia	10	12	15	12
Illinois	14	16	19	16
Massachusetts	11	12	13	12
Michigan	31	31	34	32
Pennsylvania	24	24	27	25
Washington	18	1	20	19
Average	**18**	**19**	**21**	**19**
Adjust Costs for Percentage Driven by Labor (Costs per Household, $) *Assume the following percentage of costs in each State are labor costs: 90 percent* *Prorate labor portion by ratio of State 2021 salary to Puerto Rico 2021 salary*				
Georgia	7	8	10	8
Illinois	9	11	12	11
Massachusetts	7	8	9	8
Michigan	20	21	23	21
Pennsylvania	16	16	18	16
Washington	12	13	13	13
Average	**12**	**13**	**14**	**13**
Project Puerto Rico Costs ($)				
Georgia	5,645,067	7,149,953	8,616,532	7,137,184
Illinois	8,082,598	9,146,601	10,712,421	9,313,873
Massachusetts	6,043,452	6,783,610	7,700,939	6,842,667
Michigan	17,523,251	17,794,241	19,524,422	18,280,638
Pennsylvania	13,601,994	13,514,744	15,385,651	14,167,463
Washington	10,458,681	10,977,767	11,407,999	10,948,149
Average	**10,225,841**	**10,894,486**	**12,224,661**	**11,114,996**
Puerto Rico Costs if Staff Get Low Raise (35 Percent, $)				
Georgia	7,423,263	9,402,188	11,330,740	9,385,397
Illinois	10,628,617	12,027,780	14,086,834	12,247,744
Massachusetts	7,947,140	8,920,447	10,126,735	8,998,107
Michigan	23,043,076	23,399,427	25,674,615	24,039,039
Pennsylvania	17,886,623	17,771,888	20,232,131	18,630,214
Washington	13,753,166	14,435,764	15,001,519	14,396,816
Average	**13,446,981**	**14,326,249**	**16,075,429**	**14,616,220**

State	2017	2018	2019	Average
Puerto Rico Costs if Staff Get High Raise (75 Percent, $)				
Georgia	9,455,487	11,976,171	14,432,691	11,954,783
Illinois	13,538,352	15,320,556	17,943,306	15,600,738
Massachusetts	10,122,783	11,362,546	12,899,073	11,461,467
Michigan	29,351,446	29,805,354	32,703,407	30,620,069
Pennsylvania	22,783,341	22,637,196	25,770,965	23,730,500
Washington	17,518,291	18,387,760	19,108,399	18,338,150
Average	**17,128,283**	**18,248,264**	**20,476,307**	**18,617,618**