

August 1, 2025

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

**EXECUTIVE SUMMARY**

**ALL COUNTY LETTER NO. 25-56**

The purpose of this All County Letter is to provide information about California's upcoming implementation of the federally required National Accuracy Clearinghouse and provide County Welfare Departments initial guidance on the use of the match for CalFresh.



JENNIFER TROIA  
DIRECTOR

CALIFORNIA HEALTH & HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
744 P Street • Sacramento, CA 95814 • [www.cdss.ca.gov](http://www.cdss.ca.gov)



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August 1, 2025

ALL COUNTY LETTER NO. 25-56

TO: ALL COUNTY WELFARE DIRECTORS  
ALL CALWORKS PROGRAM SPECIALISTS  
ALL CALFRESH PROGRAM SPECIALISTS  
ALL QUALITY CONTROL COORDINATORS  
ALL COUNTY INCOME AND ELIGIBILITY VERIFICATION  
SYSTEM COORDINATORS  
ALL COUNTY SPECIAL INVESTIGATIVE UNIT CHIEFS

SUBJECT: THE UNITED STATES DEPARTMENT OF AGRICULTURE, FOOD  
AND NUTRITION SERVICE NATIONAL ACCURACY  
CLEARINGHOUSE IMPLEMENTATION

REFERENCE: [PUBLIC LAW 115 - 334 - AGRICULTURE IMPROVEMENT ACT OF 2018; 7 CODE OF FEDERAL REGULATIONS \(CFR\) SECTION 272.1\(C\)\(4\), 7 CFR SECTION 272.4\(E\), 7 CFR SECTION 272.18, AND 7 CFR SECTION 273.12\(C\)\(3\)\(IV\); FNS NAC QUESTIONS AND ANSWERS](#)

The purpose of this All County Letter (ACL) is to provide information about California's implementation of the federally required National Accuracy Clearinghouse (NAC) and provide County Welfare Departments (CWD) with an overview of the use of this match for CalFresh. Automation of the NAC in the California Statewide Automated Welfare System (CalSAWS) is expected November 2026. More details regarding automation, implementation, and use of the NAC match for CalFresh will be released under separate cover in the coming months.

## **BACKGROUND**

The NAC is a federally required interstate data matching system designed to prevent Supplemental Nutrition Assistance Program (SNAP) participants from receiving benefits in multiple states. The NAC interim final rule (IFR) establishes the requirements of the NAC, as required by the Agriculture Improvement Act of 2018 (2018 Farm Bill). Under the IFR, and by the October 2027 regulatory deadline, State agencies are required to

share information about SNAP participants with the NAC, conduct matches against the NAC to discover and prevent interstate duplicate participation, and take appropriate actions when matches are found.

The [2018 Farm Bill](#) requires the United States Department of Agriculture, Food and Nutrition Service (FNS) to implement two sections related to the NAC:

- Section 4011 amended Section 11 of the Food and Nutrition Act of 2008 by creating a new subsection (x). This subsection requires FNS to establish an interstate data system called the NAC, promulgate regulations, and protect the identity and location of SNAP applicants and participants who are considered vulnerable individuals (including victims of domestic violence).
- Section 4009 amended Section 11(e) of the Food and Nutrition Act of 2008 to require State agencies to act on NAC matches, consistent with requirements for the Prisoner Verification System and Deceased Matching System data matches.

These requirements are codified at [7 CFR 272.18](#) and [7 CFR 273.12\(c\)\(3\)\(iv\)](#).

Per FNS, the NAC's primary goal is to enhance program integrity, ensure fair and accurate distribution of SNAP benefits to eligible recipients across state lines, and establish safeguards to ensure households receive benefits for which they are eligible and are not incorrectly removed from the program.

## **USE OF NAC INFORMATION FOR CALFRESH ELIGIBILITY**

Section 11(x)(2)(C) of the 2018 Farm Bill states that information provided to the NAC may only be used for the purposes of preventing duplicate participation in SNAP. The NAC IFR further clarifies that information from the NAC must only be disclosed to persons directly connected with the administration or enforcement of the provisions of SNAP regulations. Information obtained from the NAC may only be used for the purpose of preventing multiple issuances of SNAP benefits to an individual by more than one State agency in a given month. (7 CFR 272.1(c)(4)).

Per federal regulations, NAC must be queried for all household members at application, recertification, and when adding a new household member. Whenever a NAC match occurs, CWDs must take action to resolve the NAC match, per [7 CFR 272.18\(c\)](#). The NAC will conduct daily matches and a monthly bulk match. The monthly bulk match will not result in duplicate match records being created for open daily matches the CWDs have not resolved. A match record will remain open in the NAC until both State agencies have recorded final disposition of the NAC match in the system.

Identity, residency, and Social Security Number (SSN) must be verified for the head of household and the SSNs verified for all other household members prior to conducting a query in NAC. Only individuals who have a verified SSN will be included in NAC matches. Regulations at [7 CFR 272.4\(e\)](#) stipulate that State agencies use names and

SSNs, at a minimum, to identify individuals who may be considered duplicate participants.

Regulations at 7 CFR 273.6 require that a household applying for or receiving SNAP benefits provide the CWD with the SSN of each household member or verify that each household member has applied for one before certification. If an individual has applied for an SSN and can provide proof of application, the CWD will continue with the eligibility determination process as appropriate. Once the individual receives an SSN and reports it to the CWD, the individual will be added to the NAC daily active participant upload, per [7 CFR 272.18\(b\)\(2\)](#).

### **NAC MATCH RETRIEVAL**

The NAC will be automated into CalSAWS providing CWDs with potential duplicate aid information for all active CalFresh program applicants and recipients.

When a CWD receives a positive match from a NAC, they will resolve the match and the other State agency will be notified of the initiated action. This process will occur outside the CalSAWS system. Auto-journals will be triggered upon receiving response from NAC on match or no match. An additional auto-journal will be triggered upon worker action, confirming no impact.

While NAC is a requirement in the CalFresh program, CWDs must follow relevant program rules for households also receiving CalWORKs benefits. If the assistance unit is found to be receiving duplicate benefits, the CWDs must take action according to the CalWORKs program rules.

### **NAC NOTICING AND TIMEFRAMES**

When a NAC match is received, indicating potential duplicate aid, the CWD must resolve the match to determine appropriate actions to take on the case and provide written notice to the household. To resolve the match, the CWD may use information known to the county and must verify any questionable information. The CWD must adequately document in the case file all actions taken related to the NAC.

For matches received at application, recertification, or the addition of a household member that requires additional information to resolve the match, CWDs must provide households at least 10 days from the date the verification notice is mailed to respond with the information requested. For households that fail to respond to a verification letter by the due date, the CWD must issue a notice of denial or discontinuance for the person in question.

Similarly, for matches received during a household's certification period that require additional information to resolve the match, CWDs must provide households at least 10 days from the date a client verification letter is mailed. For clients that fail to respond by the due date, the CWD will remove the individual indicated in the NAC match from the household and adjust benefits accordingly.

## **NAC IMPLEMENTATION TIMEFRAME**

FNS is requiring implementation of the NAC using a phased approach and anticipates all state agencies will be onboarded to the NAC no later than October 2027. FNS anticipates releasing additional question and answer documents in the future, as NAC implementation progresses. As part of FNS' implementation plan, state agencies will receive training, tools, and technical assistance to implement the rule successfully and effectively implement the NAC system.

The California Department of Social Services will provide more details regarding automation, implementation, and use of the NAC match for CalFresh in the coming months.

For any questions or additional guidance regarding the automation of the NAC, contact the Data Stewardship and Integrity Bureau at [PIBPolicyUnit@dss.ca.gov](mailto:PIBPolicyUnit@dss.ca.gov).

For any questions or additional guidance on CalFresh Policy changes due to the NAC, contact the CalFresh Policy Bureau at [CalFreshPolicy@dss.ca.gov](mailto:CalFreshPolicy@dss.ca.gov).

Sincerely,

### ***Original Document Signed By***

ALEXIS FERNÁNDEZ GARCIA  
Deputy Director  
Family Engagement and Empowerment  
Division

RYAN GILLETTE  
Chief Data Officer  
Research, Automation, and Data  
Division