



General Information System (GIS) Message

Section 1

Transmittal:	25DC061 Upstate and New York City
Date:	September 15, 2025
To:	Subscribers
Suggested Distribution:	Commissioners, SNAP Directors, TA Directors, HEAP Coordinators, Fraud Directors, CAP Coordinators, Staff Development Coordinators, Fair Hearing Staff, WMS Coordinators
From:	Valerie Figueroa, Deputy Commissioner, Employment and Income Support Programs
Subject:	Implementing Changes to SNAP Standard Utility Allowance (SUA) Policy for Households in Receipt of HEAP – Preliminary Guidance
Effective Date:	7/4/25
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Attachments:	N/A

Section 2

As described in [25DC055](#), on July 4, 2025, the President signed into law the One Big Beautiful Bill Act (H.R. 1) which included several Supplemental Nutrition Assistance Program (SNAP) policy changes. The purpose of this GIS is to provide initial guidance for implementing the changes to SNAP Standard Utility Allowance (SUA) policy, as required by the new federal law. More detailed guidance is forthcoming.

Section 3

Background

In lieu of demonstrating actual utility costs, it has been longstanding federal SNAP policy that households in receipt of a qualifying Low Income Home Energy Assistance Program (LIHEAP) payment are deemed to have incurred out-of-pocket heating/cooling expenses and therefore entitled to and required to be provided with the Heating and Cooling SUA (HCSUA).

Note: To be considered qualifying for the HCSUA, a LIHEAP payment must be greater than \$20 and received in the current month or immediately preceding twelve months.

The new federal law partially unwinds this association between LIHEAP and the HCSUA. Going forward, the receipt of a qualifying LIHEAP payment only confers HCSUA eligibility to households containing an aged and/or disabled member. All other households must establish that they have a separate heating or cooling utility expense.

Required Action

Effective immediately and retroactive to July 4, 2025, whenever a district is determining SNAP benefit eligibility, they must apply this new policy provision to the SUA level determination. When assigning the SUA status, the district *must not use* LIHEAP receipt as a basis for granting the HCSUA *unless* the household has at least one member who qualifies as Aged or Disabled.

Although LIHEAP-conferred HCSUA households without an aged/disabled member or separate heating/cooling expenses may no longer be eligible for the HCSUA, they may instead be entitled to the Utility SUA if they have a separate expense for a non-heating/cooling utility. Such utility expenses include electricity, cooking fuel, sewage, trash collection, water fees, fuel for heating hot water, and rental fee for a propane tank. Please note, before removing the full HCSUA from a household responsible only for non-heating utility expenses without an aged or disabled household member, districts should confirm whether the household incurs cooling costs. This would include window unit air conditioners that run using electricity.

Note: Most households do, at a minimum, incur some expense for telephone use and are therefore eligible for at least the Telephone SUA.

Implementing Timeline for Initial Applications

The provisions of H.R. 1 became effective immediately upon passage. Therefore, effective immediately, all new SNAP applications filed on or after July 4, 2025 for which ongoing eligibility has not yet been determined must be evaluated for HCSUA eligibility using this new policy.

Expedited Screening and Case Processing

Due to this change, it is possible that some pending applications may have screened eligible for expedited processing because of a LIHEAP-conferred HCSUA status to which they no longer may be entitled. For any such pending applications, prior to completing the expedited processing and authorizing the initial expedited SNAP issuance, districts should re-evaluate the appropriateness of the HCSUA designation and if necessary complete an updated [LDSS-3938 – Supplemental Nutrition Assistance Program \(SNAP\) Application Expedited Processing Summary Sheet](#).

Similarly, some households may have received an initial expedited SNAP benefit based on a LIHEAP-conferred HCSUA status and are currently only conditionally eligible based upon expedited processing rules. For any such households who have not yet had their ongoing eligibility established beyond the initial expedited issuance, the district must reconsider the appropriateness of the HCSUA designation prior to issuing ongoing benefits.

As a reminder, there is generally no overpayment for cases processed under expedited rules in situations where ongoing SNAP benefits are adjusted downward from the initial expedited issuance.

Continuing Participation

Districts must not proactively remove an ongoing household's eligibility for the HCSUA during the certification period based solely on information that the household does not contain an aged or disabled member. This information alone is not enough to determine the impact of the rule change on the household's eligibility. In many cases, the earliest interval where it may be possible to take action to remove HCSUA status will be at recertification.

For example, although the [LDSS-4310 Periodic Report](#) asks households to report whether they have new utility expenses, there may not be adequate information in the case record to remove a LIHEAP-conferred HCSUA status when processing the periodic report. The HCSUA should only be removed during the Periodic Reporting interval if the household reports and verifies a change in shelter arrangement with no separate heating or cooling expenses. Consider the following examples for a non-aged disabled household, renting an apartment with LIHEAP-conferred HCSUA status:

Example 1) At initial eligibility determination, it was established that the heat was included in the rent, but the household paid separately for electricity. At periodic report, the household reports no change in shelter arrangement and does not indicate any new utility expenses. However, although it is known that the LIHEAP benefit is no longer a sufficient basis for establishing HCSUA eligibility, it is not known whether the household incurs a cooling cost as part of their electricity payment responsibility. They should therefore continue to receive the HCSUA until the utility expenses can be explored in more detail with the household at recertification.

Example 2) At periodic report, the household reports and verifies that they have moved to a new apartment with all utility expenses included in the rent. The household would no longer be entitled to the HCSUA.

Recertification

All outstanding recertification applications for cases with a certification end date of July 31, 2025, or later must be evaluated for HCSUA eligibility using this new policy.

Sourcebook Section 6, page 6, reads in part as follows, "3) A household's eligibility to claim the standard utility allowance may be reverified, if not questionable, only if the household has moved or changed utilities." Due to this legislative change, the LIHEAP-conferred HCSUA status for non-aged/disabled households would be considered questionable. For these households, districts must explore and verify continued entitlement for the HCSUA at the time of recertification, even if the household's living situation is unchanged.

Changes During the Certification Period, Moves and Household Composition Changes

Apart from the above required contact points, the only times it may be appropriate to remove the HCSUA status for one of these impacted households would be in the instance where a

household voluntarily reports and verifies a move to a new shelter with no separate heating/cooling expenses, or in the event of a split household.

If a household with an aged or disabled member that received a qualifying HEAP payment subsequently splits into multiple SNAP households, districts must consider whether each of the separate households contain an aged or disabled member. If each of the separate households contain an aged or disabled member, the district must confer the HCSUA to each of the households based on the qualifying HEAP payment. If one of the separate households resulting from the split does not contain an aged or disabled member, that household is no longer entitled to receive the HCSUA unless they incur separate heating or cooling expenses, as described above.

Verification

Consistent with 12-INF-06, in addition to identifying the appropriate SUA status at the eligibility intervals described above, districts must request and receive verification of separate utility expenses prior to granting the SUA deduction.

Please note, in situations where a household has no heating expense responsibility but claims a cooling expense and provides verification of their electricity bill, there is no need to further verify that a portion of the electricity expense is used for air conditioning. Verification of the electricity utility bill combined with the attested cooling expense would be sufficient to grant the HCSUA status.

Advance \$21 Nominal Home Energy Assistance Program (HEAP) Benefit Payment

Districts should continue to authorize an advance \$21 Nominal HEAP benefit to newly eligible SNAP households living in a HEAP eligible living arrangement; however, only households that contain an Aged or Disabled household member are eligible to receive the full HCSUA due to the receipt of a HEAP benefit greater than \$20. The policies and requirements described in [GIS 18 TA/DC012 \\$21 Nominal HEAP Benefit Advance Payment](#) will be updated to reflect that the \$21 Nominal HEAP Benefit Advance Payment only confers HCSUA eligibility for households that include someone Aged or Disabled.

Systems Implications

WMS Edit 1257 requiring the full HTAC SUA = X on FS Budgets with Fuel Type 0 and WMS Edit 1261 requiring an NX payment have been disabled. More detailed information about systems implications will be provided separately.