

**Can States Contract for Services?
Opportunities to Align Federal-State Health and Human Services Programs**

	Greater State Flexibility		Restriction on State Flexibility		
Are contractors allowed to perform the following program functions?	TANF	CHIP	Medicaid	Unemployment Insurance	SNAP
Information Technology (includes software/hardware, EBT)	Yes	Yes	Yes	Yes	Yes
Answer General Program Q's	Yes	Yes	Yes	Yes	Yes
Employment and Training	Yes	NA	Presumed yes, under new waiver authority	Yes	Yes
Program Integrity / Fraud, Waste, Abuse – Act on Findings	Yes	Yes	Initiate, but not finalize	No	No
Intake and Application Processing	Yes	Yes	Yes	No	No
Interviews	Yes	Yes	Yes	No	No
Verification	Yes	Yes	Yes	No	Limitations
Eligibility Determination	Yes	Yes	Initiate, but not finalize	No	No
Redeterminations	Yes	Yes	Initiate, but not finalize	No	No
Entering/Changing Information in System (status change, or info from recipient or third party)	Yes	Yes	Limitations	Yes	No
Answer Simple Case-Specific Questions	Yes	Yes	Generally yes	Generally yes	Generally no; 12/19/17 USDA memo allows limited narrow exceptions & requires USDA approval
Answer Complex Case-Specific Questions	Yes	Yes	Generally yes	Generally yes	No
Statutory Provision and Cite Relating to Merit-Based Personnel Standards	Title IV-D/AFDC language eliminated by PRWORA 1996; state discretion under TANF	No requirement or limitation	Section 1902(4)(a) of the Social Security Act	Section 303(a) of Social Security Act	Section 11(e)(6)(B) of the Food and Nutrition Act of 2008