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United States
Department of
Agriculture

Food and
Nutrition
Service

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SUBJECT: Questions and Answers on Measuring for the Timeliness of Supplemental Nutrition Assistance Program (SNAP) Applications for Recertification

TO: All Regional Directors
Supplemental Nutrition Assistance Program

The attached document provides answers to inquiries from State agencies on measuring for the timeliness of Supplemental Nutrition Assistance Program (SNAP) applications for recertification (Item 70). As you are aware, States are required to measure for recertification timeliness beginning in Fiscal Year 2013. The attached questions and answers should help State agencies implement the new measure as smoothly as possible.

As you are aware, we developed several tools to help States become more familiar with the recertification timeliness measure. We have posted the most current versions on PartnerWeb under "Timeliness of Recertification" in the SNAP Policy folder. We were alerted to an inconsistency in Step 1 of Tool 1 and have revised and reposted the tool accordingly. We also want to make sure all State agencies are using the most current recertification timeliness tools available. Several of the questions we received were related to outdated tools. The tools may be updated again if any changes are needed, and we will let you know if we make any major changes.

Should you have additional questions, please contact Sasha Gersten-Paal at (703) 305-2507 or sasha.gersten-paal@fns.usda.gov or Moira Johnston at (703) 305-2515 or moira.johnston@fns.usda.gov.

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Attachment

The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

ATTACHMENT

QUESTIONS AND ANSWERS ON RECERTIFICATION TIMELINESS MEASURE

Application Processing and Recertification Timeliness Measures

Question 1: The application processing timeliness measure (Item 68) only looks at applications processed within the current fiscal year (FY) under review. The guidance for the recertification timeliness measure (Item 70) appears to be asking reviewers to review recertification actions that occurred during the past 12 months, regardless of FY. Is this correct?

Answer 1: Yes. Reviewers will review active cases in which the most recent action was a recertification up to 12 months prior to the sample month. If there is no recertification processed within the last 12 months prior to the sample month, the case will not be used in the timeliness of recertification, but could be coded as code "30" or code "40".

Question 2: Does the recertification timeliness measure (Item 70) affect the way reviewers review cases for application processing timeliness (Item 68)?

Answer 2: No. Reviewers will continue to review for application processing timeliness (Item 68) as they did previously.

Question 3: If the household submitted its recertification application late and the application is now considered a new application, should the reviewer look back 12 months through the case history to review the most recent recertification action under recertification timeliness (Item 70)?

Answer 3: No. The reviewer should only review for recertification timeliness if the most recent action was a recertification. In this case, the most recent action was an initial application, so the reviewer should code the case under application processing timeliness (Item 68).

Question 4: If a case is included in the application processing timeliness measure (Item 68), can it also be included in the recertification timeliness measure (Item 70)?

Answer 4: Yes, some cases will be included in both the application processing (Item 68) and the recertification timeliness (Item 70) measures. If the household initially applied within the fiscal year under review and the most recent action in the case is a recertification, the reviewer would include the case in

both the application processing and recertification timeliness measures. See below.

Example 1: The Brown household applies in January, is certified initially for 6-months, and is recertified in June. If the Brown case is pulled in September, the Brown household will be counted in both measures.

Example 2: The Green household is recertified in January for 6-months, but does not reapply until October. This case is pulled in November, but the Green household would only be counted in the application processing timeliness measure because the most recent action was an application.

Question 5: How would a reviewer treat a case that a State has recently terminated and reinstated (under a reinstatement waiver)?

Answer 5: Reinstatement waivers allow States to reinstates SNAP eligibility to households that are recently ineligible due to failure to provide information or verification. Cases that fall under these waivers are neither initial applications nor recertifications. Therefore, reviewers should code such cases as 3 under application processing timeliness measure (Item 68) and coded as 40 under the recertification timeliness measure (Item 70).

Questions Related to Specific Recertification Timeliness Codes

Question 6: How does a reviewer code a case that is a new application? Does the reviewer use code “40” or code “50”?

Answer 6: If the most recent action on a case is a new application, code “40” (Not yet Due for Recertification).

Reviewers should use code “50” if the most recent action is a recertification, but the State did not recertify the household within the 12 months prior to the sample month.

Question 7: How do reviewers use code “40”? Please provide more of an explanation.

Answer 7: Reviewers should use code “40” for any case that is not due for recertification.

Example: A household applied in May, was certified for 12 months, and was pulled for QC in September. The reviewer would use code “40” because it was not yet due for recertification.

Question 8: What month does the QC reviewer use to determine if a household receives benefits outside the certification period (code “30”)? Please describe code “30” in more detail.

Answer 8: QC reviewers should look at the sample month and the 12 months prior to the sample month to determine if a household received benefits outside the certification period.

Reviewers should use code “30” in cases in which households receive benefits even though they are no longer certified to receive benefits. Ideally, this code will be used rarely, if ever.

Example: A household is certified to receive benefits until January. The household applies for recertification, but the State agency does not act on the recertification. The household continues receiving benefits in February and March even though it is not under a certification period. In April, the State agency recertifies the household. If the sample month is March or May, The reviewer would code this case as code “30”—outside of the certification period.

Question 9: When should reviewers code a case as code “50”? Please provide an example.

Answer 9: Reviewers should use code “50” if the most recent action on the case was a recertification, but the household has not been recertified within 12 months prior to the sample month.

Example: A State agency certifies an elderly household for 24 months in June of 2011. The case is pulled in March of 2013. The reviewer would code the case as code “50” because the most recent action is a recertification, but the recertification was not within 12 months prior to the sample month.

Question 10: Is there a timeframe for the State agency’s failure to act in code “13” (State agency failed to act on completed recertification application)?

Answer 10: No. There is no timeframe for the State agency’s failure to act. QC reviewers should use code “13” if the State agency caused the delay, but the case does not meet the qualifications for code “11” code “12.”

Question 11: How does a reviewer code if the date of issuance was not maintained because the client rescheduled an interview? The client didn’t miss a scheduled interview, he rescheduled it with the agency.

Answer 11: Reviewer should code the case as code “27,” or untimely – other client caused delay.

Questions Specific to the Recertification Timeliness Tools

Question 12: Step 3 asks, “Was the client recertified within the 12 months prior to the QC sample month?” Is the reviewer supposed to use the first month of the certification period after the recertification action or the date of the actual recertification action (which may be about one month earlier)?

Answer 12: When responding to Step 3, reviewers should use the first month of the certification period after the recertification action.

Question 13: FNS provided five separate tools on the Partner Web related to recertification timeliness. Are these tools just provided as guidance to code these cases correctly and collect the required documentation or are we required to use these tools and keep some of them in each case record?

Answer 13: The tools were developed as guidance and training materials. They are not required but we suggest you use them for accuracy and consistency among reviewers.

Question 14: The flow chart asks, “Was the household recertified and was the date of issuance maintained?” (Step 4). Is this step asking if the issuance is timely for the first month of the new certification period following the recertification?

Answer 14: Yes, timely recertifications occur when the household has the opportunity to participate by the household’s normal issuance cycle in the month following the end of its current certification period.

Miscellaneous Questions

Question 15: Several of the tools provided use the term “normal issuance cycle.” Please define that term—is it defined by EBT accounts, date of issuance, or something else?

Answer 15: Normal issuance cycle means that households should receive their benefits on or about the same time each month, but State agencies may stagger benefits. State agencies shall not allow more than 40 days to elapse between the issuance between any two allotments to a household participating for longer than two consecutive months (for more information see 7 CFR 274.2(d)).

Question 16: How does a reviewer code a case if the reviewer cannot tell the cause for delay? For example, how should reviewers handle cases in which the application is not date stamped, it is difficult to determine if the interview was scheduled timely, it is unclear when the interview occurred or when the information was requested?

Answer 16: On individual cases where the reviewer cannot tell the cause for delay, sound judgment will need to be used. The tools are created to guide reviewers in making determinations and in most cases reviewers should be able to get to a conclusion. Remember, each case may not need to have all necessary documentation in order to make the coding decision.

However, if the reason for the delay is still unclear, but the reviewer can make a reasonable assumption it was caused by the State agency, the reviewer may code the case as code "13." If the reviewer can safely assume the reason for the delay was caused by the client, the reviewer can code the case as code "27."

As always, FNS can review specific cases if you have coding questions.