



Food and
Nutrition
Service

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DATE: August 2, 2023 (Updated August 1, 2024)

SUBJECT: Supplemental Nutrition Assistance Program (SNAP) – Updated
Guidance for Improving State Agency Application Processing
Timeliness Rates: Standardizing the Escalation Process

TO: All SNAP State Agencies
All Regions

The purpose of this memorandum is to advise State agencies on the steps the Food and Nutrition Service (FNS) will take to monitor and engage State agencies with poor Supplemental Nutrition Assistance Program (SNAP) initial application processing timeliness (APT) rates. This memo replaces guidance from the memorandum dated March 18, 2016, Guidance for Improving State Timeliness Rates and Standardizing the Escalation Process.

Low APT rates have a real and significant impact on eligible households who struggle to put food on the table while their SNAP applications are stalled. Delays in receiving benefits are especially detrimental to households entitled to expedited service, who are most in need of immediate food assistance. While households may turn to food banks or other resources in times of hardship, SNAP remains one of our country's strongest defenses against hunger. State agencies are required to operate the program in a manner that ensures all eligible applicants are certified to receive benefits in a timely fashion. Timely application processing an essential element of good customer service and ensures households have access to essential nutrition assistance.

The Food and Nutrition Act of 2008 (the FNA), requires that households have the opportunity to participate in SNAP within 7 days for expedited cases and 30 days for regular cases. While States agencies are required to process all SNAP applications within the timelines provided in the statute, FNS considers an APT rate of 95 percent and above acceptable performance.

FNS has long monitored APT rates as part of its oversight responsibility to ensure State agency compliance with SNAP program requirements under 7 CFR 275.3. FNS has also required corrective action when State agencies or FNS have identified deficiencies in APT. In 2014 and again in 2016, FNS streamlined and formalized its escalation process to identify poor performing State agencies and promote significant improvements in State agencies with APT rates falling below 90 percent on the upper bound of the 95 percent confidence interval.

For many reasons, including the suspension of certain Quality Control (QC) requirements in response to the COVID-19 public health emergency (PHE), FNS has lacked available data to follow the escalation process over recent years. FNS recognizes that the PHE presented unique circumstances for our State agency

partners, which resulted in poor timeliness across the nation. While FNS' previous escalation procedures provided a standardized process to address poor timeliness, they did not provide for or envision circumstances regarding the technical assistance and flexibility required as State agencies exit from the unprecedented COVID-19 pandemic and continue to face staffing and technology issues. Accordingly, FNS is revising its escalation procedures to better reflect the current realities on the ground.

The updated escalation procedures, effective October 1, 2023, build in some flexibility for FNS to engage State agencies when APT rates fall below acceptable performance while maintaining a standardized process. Updates to the escalation procedures include engaging in technical assistance earlier, setting State agency-specific benchmarks for improvement, and data validation of State agency-generated APT data.

While the process outlined in this memo serves to standardize escalation procedures, FNS may deviate from this process when a State agency's APT rate is particularly egregious, or because of other circumstances in the State agency, such as a large backlog or major systems issues. In these cases, FNS may proceed directly to the process under [7 CFR 276.4\(d\)](#). In addition, the suggested actions or requirements at each step of the escalation procedures are only examples; individual State agencies may be directed to follow alternative processes.

In order to appropriately target State agencies with chronic timeliness issues, FNS will deviate from the escalation procedures and immediately proceed to an APT CAP when a State agency has a FNS QC APT rate below 85 percent for the two most recent consecutive quarters available as of October 1, 2023.

State agencies with questions should contact their Regional Office representatives.

Signature on file

Moira Johnston
Acting Director, Program Development Division
Supplemental Nutrition Assistance Program

Attachment

Guidance for Improving State Agency Application Processing Timeliness Rates: Standardizing the Escalation Process

The purpose of this memorandum is to update the guidance provided to State agencies on the steps the Food and Nutrition Service (FNS) will take to improve Supplemental Nutrition Assistance Program (SNAP) initial application processing timeliness (APT) rates. This memo replaces guidance from the memorandum dated March 18, 2016, Guidance for Improving State Timeliness Rates and Standardizing the Escalation Process.

While the process outlined in this memo serves to standardize escalation procedures, note that FNS may deviate from this process when a State agency's APT rate is particularly egregious, or because of other circumstances in the State agency such as a large backlog or major systems issues. In these cases, FNS may proceed directly to the process under [7 CFR 276.4\(d\)](#). In addition, the suggested actions or requirements at each step of the escalation procedures are only examples; individual State agencies may be directed to follow alternative processes.

What is Application Processing Timeliness?

The Food and Nutrition Act of 2008 (the FNA), as amended, requires that households have the opportunity to participate in SNAP, defined as having been certified with access to their benefit allotment, within 7 days for expedited cases and within 30 days for regular cases. Per Federal regulations at [7 CFR 274.2\(b\)](#), an opportunity to participate consists of two parts. First, households must have an active Electronic Benefits Transfer (EBT) card and personal identification number (PIN). Second, benefits must be posted to the household's EBT account and are available for use.

How is Application Processing Timeliness Measured?

FNS measures timeliness of initial SNAP application processing three ways: 1) the FNS Application Processing Timeliness (APT) rate, ("FNS APT Rate") 2) the State agency timeliness rate ("State APT rate"), and 3) the Certification Section of the FNS Program and Budget Summary Statement, Part B-Program Activity Statement (FNS-366B). In addition to these measures, FNS also regularly monitors State agency timeliness through management evaluation reviews, advocate and client complaints, and other modes of information gathering.

The FNS APT rate is calculated from the Quality Control (QC) active case sample and derived by dividing the number of initial SNAP applications approved within the 7- or 30-day processing requirement for a given period of time by the total number of applications approved within that same time period and multiplying by 100 percent.

$$\text{FNS APT Rate} = \frac{\# \text{ Applications Approved Timely of QC Sample}}{\text{Total Applications Approved of QC Sample}} \times 100$$

FNS calculates a 95 percent confidence interval surrounding the FNS APT rate point estimate to account for differences in the size of the QC samples. The upper bound of the confidence interval, rather than the point estimate, is used to identify and monitor timeliness¹. **If the upper bound of the confidence interval is below 90 percent, the State agency is required to take corrective action.**

FNS publishes quarterly timeliness data for each State agency. Quarterly data represents a rolling 6-month average and has a lag of approximately 4 months between the time the data is collected and its publication. Nonetheless, the data can be effective in flagging timeliness problems, particularly because in many cases timeliness issues develop and persist over time. FNS combines the reviewed cases and publishes an annual FNS APT rate for each State agency in July of each year. This annual FNS APT rate reflects the State agency's timeliness from the previous fiscal year.

For more information on the FNS APT rate, please reference the memorandum dated June 2, 2017, [Clarification on the Three Ways Initial SNAP Application Processing Timeliness is Measured](#).

In addition to the FNS APT rate from the QC sample, State agencies may also generate their own APT rate. State APT rates provide a reasonable approximation to the FNS APT rate and are often more readily available than the FNS APT rate. If the entirety of the sampling universe is utilized for the State APT rates, the direct estimate will be used in place of the upper bound of the confidence interval. The [State Agency Timeliness Data Protocol](#) outlines how to calculate the State APT rate.

Poor Timeliness Escalation Procedure: The 5-Step Approach

The FNA requires State agencies to provide all eligible applicants with timely benefits. FNS considers an APT rate of 95 percent and above acceptable performance. State agencies are subject to the escalation procedures, described below, when their FNS APT rates fall below 90 percent.

[Step 1: Pre-escalation and Identification](#)

[Step 2: APT CAP](#)

[Step 3: Advance Warning Letter](#)

[Step 4: Formal Warning Letter](#)

[Step 5: Sanction Administrative Funding](#)

¹ The FNS APT rate in the context of corrective action throughout this document refers to the upper bound of the 95 percent confidence interval of the estimated sample APT rate calculated from available State agency data.

Escalation Procedures Rollout

In order to appropriately target State agencies with chronic timeliness issues, State agencies with an FNS APT rate below 85 percent for the two most recent consecutive quarters available as of October 1, 2023, will immediately proceed to Step 2. State agencies where the most recent quarter of APT data is between 85-90 percent, as of October 1, 2023, will follow Step 1.

Step 1: Pre-escalation and Identification

FNS may use the FNS annual or quarterly APT rate to initiate the escalation process. The first time a State agency has a FNS APT rate below 90 percent on a QC quarterly or annual report, FNS will inform the State agency and offer technical assistance to identify the root cause(s) of poor timeliness and methods to improve timeliness. If the State agency's FNS APT rate falls below 90 percent for a second consecutive quarter, FNS will request an initial timeliness-specific corrective action plan (APT CAP).

While two consecutive quarters below 90 percent indicates a trend of poor performance, FNS also recognizes that large drops in timeliness between quarters warrants immediate attention. FNS reserves the right to immediately engage in the escalation procedures and request an APT CAP for any State agency whose timeliness falls below 80 percent in a single quarter. FNS will not use State agency-generated timeliness data to initiate the APT escalation process. However, the State agency can use their own timeliness data to demonstrate progress towards the achievement of benchmarks throughout the escalation process.

In addition to FNS and State APT data, FNS may also rely on other valid sources of information to capture the most current picture of timeliness. This additional information, such as backlog data, findings from an EBT management evaluation (ME) or other ME, and advocate or media reports will assist FNS in providing technical assistance to the State agency.

Step 2: APT CAP

When a State agency has a FNS APT rate below 90 percent for two consecutive quarterly reports (or, as of October 1, 2023, the two most recent quarterly reports show a rate below 85 percent), FNS will require the State agency to create or update an APT CAP. The request will outline the minimum requirements that the State agency must include in its APT CAP. FNS expects to see continuous improvement in timeliness rates. If a State agency fails to make sufficient progress towards benchmarks within the APT CAP, State agencies may be escalated.

Benchmarks

FNS will set the benchmark(s) and associated timeframes through review of current and historical APT data including the State agency's history of APT CAPs. The benchmarks will require a State agency to improve its APT rate by a certain percentage every set number of months.

Benchmarks may include:

- Achieving an intermediary APT rate (e.g., 90 percent),
- Improving an APT rate by a certain percentage, or
- Clearing a backlog in new applications or expedited applications by a specified date.

The minimum benchmark for improvement shall be at least 5 percentage points every 6 months. When setting benchmarks, FNS will consider realistic progress that a State agency can make within a specified timeframe taking into consideration current State agency initiatives.

Corrective Action Plan

State agencies must follow the processes described in [7 CFR 275.16](#) and [7 CFR 275.17](#) when planning for and creating an APT CAP. FNS can provide technical assistance to the State agency in identifying the root cause(s) of the timeliness problem and in identifying steps the State agency can take to address the root cause(s). For example, FNS can facilitate calls with the State agency's systems, policy, and integrity personnel. These calls can be used to share information and best practices from State agencies with recent improvements or sustained high timeliness performance; discuss waivers and State options that may assist timeliness; and provide consultation on business process reengineering (BPR).

FNS will review the APT CAP and provide feedback on any necessary improvements. As part of the CAP, FNS will require monthly submission of State calculated APT rates. Once the APT CAP is acceptable, FNS will inform the State agency in writing.

With the submission of its initial APT CAP, the State agency may present FNS with State agency-calculated timeliness data following the [State Agency Timeliness Data Protocol](#) for the preceding 6 months to demonstrate how recent actions may have improved timeliness. The State agency-calculated data may help to support activities that the State agency will include in the APT CAP and may guide FNS in its review of the APT CAP. FNS will review this data to ensure the State agency collects it in accordance with the State Agency Timeliness Data Protocol and other applicable standards.

State agencies must submit ongoing updates to their APT CAP to FNS by May 1 and November 1 of each year. These updates should include specific progress made with each activity outlined in the State agency's APT CAP and any effect on its APT rate that the activity has made. FNS will review each State agency's update and may adjust milestones to encourage progress towards an APT rate of 95 percent. FNS will communicate any new or adjusted benchmarks in its response to each APT CAP update.

Release from APT CAP

FNS will release the State agency from the APT CAP when the State agency has a FNS APT rate of 95 percent for two consecutive quarterly reports or State agency data following the [State Timeliness Agency Data Protocol](#) validated by FNS shows an APT rate of 95 percent for 6 consecutive months. If there is a significant discrepancy between the FNS and State APT rates where one rate falls below 95 percent, FNS will investigate further prior to

releasing the State agency. FNS will send the State agency a letter releasing the State agency from the APT CAP.

Step 3: Advance Warning Letter

When a State agency fails to meet benchmarks set by FNS through the [APT CAP](#) process, or refuses to engage in the APT CAP process, FNS will send an Advance Warning Letter in accordance with [7 CFR 276.4\(d\)\(1\)](#). This letter will alert the State agency it is at risk of receiving a [Formal Warning Letter](#) if it does not meet the benchmarks outlined in the Advance Warning Letter by the specified timeframe. FNS expects to see continuous improvement in timeliness rates. If a State agency fails to progress to the satisfaction of FNS, FNS may escalate to Formal Warning. FNS may also issue a Formal Warning Letter without first issuing an Advance Warning Letter to expedite the escalation procedure after noncompliance or lack of progress during the APT CAP stage.

Benchmarks

FNS will set the benchmark(s) and associated timeframes through review of APT data and current circumstances. Refer to [Benchmarks](#) under Step 2 for details.

State agencies that previously refused to engage in the APT CAP process must submit an APT CAP to FNS within 30 calendar days of receipt of the Advance Warning Letter.

Revised Corrective Action Plan

State agencies that failed to meet benchmarks of their APT CAP must revise their APT CAP and submit it to FNS within 30 calendar days of receipt of the Advance Warning Letter. The revised APT CAP must specifically indicate which previous activities were ineffective and why. It must also specify which activities will continue (and how the State agency will adjust the activity to be effective) and any new activities that the State agency plans to implement. FNS will review the revised APT CAP and provide feedback and guidance to the State agency. FNS will accept the APT CAP when it is to FNS's satisfaction. FNS can provide technical assistance to the State agency to refine and help identify new activities targeting the timeliness problem. For example, FNS can send "call for action" letters to State agency leadership or provide State agency exchange funds to support sharing of best practices between State agencies.

For details on initial APT CAPs including the use of State agency-calculated timeliness data, please refer to [Corrective Action Plan](#) under Step 2.

During this stage, FNS will work closely with the State agency and will require progress reports towards the specified benchmarks. These progress reports will include monthly updates, at a minimum, on the State calculated APT rate. FNS will also meet with State agencies monthly, at a minimum, to review data and progress reports and discuss any additional action or technical assistance needed.

Release from the APT CAP and Escalation

FNS will release the State agency from the APT CAP and escalation procedures when the State agency has a FNS APT rate of 95 percent for two consecutive quarterly reports or State agency data following the [State Agency Timeliness Data Protocol](#) validated by FNS shows an APT rate of 95 percent for 6 consecutive months. FNS will send the State agency a letter closing the Advance Warning and releasing the State agency from the APT CAP and escalation procedures.

Step 4: Formal Warning Letter

When a State agency fails to progress to the satisfaction of FNS through the [Advance Warning](#) process, FNS will send a Formal Warning Letter in accordance with [7 CFR 276.4\(d\)\(2\)](#). FNS may also issue a Formal Warning Letter without first issuing an Advance Warning Letter to expedite the escalation procedure after noncompliance with the APT CAP. FNS will alert the State agency that it is at risk of having Federal funds suspended, disallowed, or both if it does not meet the benchmarks outlined in the Formal Warning Letter by the specified timeframe. The letter will document the amount of Federal funds that will be suspended or disallowed (or an estimate if the actual amount is not available) if the APT issue is escalated further.

Benchmarks

FNS will set the benchmark(s) and associated timeframes through review of APT data and current circumstances. Refer to [Revised Corrective Action Plan](#) under Step 2 for details on revising the APT CAP. Refer to [Benchmarks](#) under Step 2 for details.

Revised Corrective Action Plan

The State agency must revise its APT CAP and submit it to FNS within 30 calendar days of receiving the Formal Warning Letter. FNS can provide technical assistance to the State agency, such as holding meetings between FNS leadership and State agency leadership.

During this stage, FNS will work closely with the State agency and will determine the frequency of communication (e.g. monthly or weekly) with State agencies to review State calculated APT rates, metrics and progress towards meeting APT CAP benchmarks, and tailor any additional action or TA provided to State agencies' needs.

Release from APT CAP and Escalation

FNS will release the State agency from the APT CAP and escalation procedures when the State agency has a FNS APT rate of 95 percent for two consecutive quarterly reports or State agency data following the [State Agency Timeliness Data Protocol](#) validated by FNS shows an APT rate of 95 percent for 6 consecutive months. FNS will send the State agency a letter closing the Formal Warning and releasing the State agency from the APT CAP and escalation procedures.

Step 5: Sanction Administrative Funding

If a State agency fails to submit a satisfactory APT CAP within 30 calendar days of receiving the Formal Warning letter, or fails to achieve the commitments in its APT CAP by the dates specified in the APT CAP, FNS will take action to suspend or disallow Federal funds afforded to the State agency ([7 CFR 276.4\(e\)](#)).

Policy Implementation Date

This policy will be effective October 1, 2023. FNS will use the most recent FNS quarterly APT data with a rolling 6-month average APT rate to begin escalation procedures. See [Escalation Procedures Rollout](#) for more information.

State Agency Timeliness Data Protocol

This data protocol provides State agencies guidance on how to gather certification data to generate their own APT rate. State APT rates can often be calculated and made available more readily than the FNS APT rate.

This protocol uses the entire universe of State agency SNAP cases for a given period of time instead of a sample of case files like the FNS APT rate. If the entirety of sampling universe is utilized for the State APT rates, the direct estimate will be used in place of the upper bound of the confidence interval. The State APT rate also includes applications pended due to missing verifications, whereas such cases are excluded from the FNS APT rate. Lastly, the APT rate includes an estimation of the length of time it takes to load benefits on an EBT card once the household is approved, whereas the FNS APT rate directly measures this amount of time and includes it in the number of processing days.

Using certification data instead of reviewing sampled cases during a case file review allows the State agency to generate a timely APT rate that can be used by the State agency and FNS to track progress and determine if corrective action strategies have the intended impact on the State agency's APT performance. FNS will validate State agency-generated APT rates by following the procedures outlined in the [Data Validation](#) section of this Protocol.

State APT Rate Formula

A State agency calculates the State APT rate by dividing the number of SNAP applications approved within the 7 or 30-day processing requirement by the total number of applications approved within a specified timeframe.

$$\text{State APT Rate} = \frac{\text{\# Applications Approved Timely}}{\text{Total Applications Approved}} \times 100$$

Definitions

\# of Applications Approved Timely: Within a specified timeframe, the number of SNAP initial applications subject to the 7-day processing requirements that were certified to receive benefits by the 7th day from the date of application plus the number of SNAP initial applications subject to the 30-day processing requirements that were certified to receive benefits by the 30th day from the date of application.

Date of Application: The date the State agency receives a SNAP initial application with the minimum requirement of a name, address and signature of the applicant or authorized representative.

Date of Certification: The date the State agency certifies a SNAP initial application for SNAP.

Date of Issuance: The date that SNAP benefits are available for a certified SNAP initial applicant to use.

Opportunity to Participate: An applicant certified for SNAP must receive an active EBT card, EBT PIN and have their benefits posted to their EBT card for use by the 30th day or 7th day for applicants that meet expedited service criteria. While actual case files are used to accurately determine opportunity to participate for QC purposes, this protocol uses a universe of certification data pulled from an eligibility system where all factors needed to determine Opportunity to Participate may not be readily available. For this reason, *the Date of Issuance will be used as a reasonable proxy for Opportunity to Participate in this data protocol.*

Properly Pended for Missing Verification (Properly Pended): A SNAP initial application that is pended on the 30th day from the date of application because the applicant has not submitted required verification requested by the State agency and the State agency has assisted, notified, and provided sufficient time for the actions outlined in [7 CFR 273.2\(h\)\(1\)\(i\)](#). SNAP initial applications properly pended (for applicant delay in providing verification) are excluded from the FNS APT Rate. An approved SNAP initial application that is pended for any other reason is **not** excluded from the FNS APT rate and therefore considered untimely. While actual case files are used to accurately determine if an application was properly pended due to a client's delay in providing verification for QC purposes, this protocol uses a universe of certification data pulled from an eligibility system where all factors needed to determine properly pended are unlikely to be available. For this reason, this protocol will **not** adjust for properly pended applications.

SNAP Initial Application: An application to receive benefits from SNAP, including multi-program applications where the applicant has identified SNAP, from an applicant not currently receiving SNAP from the State agency. Applications submitted within 30 days after the end of the certification period should be treated as an application for recertification and is not included in the APT rate.

SNAP Recertification Application: An application to continue receiving benefits from SNAP from an applicant currently receiving SNAP from the State agency or from an applicant whose certification period expired within the last 30 days from date of application.

State APT Rate: Application Processing Timeliness (APT) rate is the percent of a State agency's certified initial SNAP applications approved within 7 or 30-day SNAP statutory processing requirements.

Total Applications Approved: Within a specified timeframe, the total number of SNAP initial applications, including those applications that make up the "# of Applications Approved Timely."

Gathering and Analyzing the Data

Data Pull: Send with first submission of State APT data and when requested by FNS

- Collect the following data elements for any SNAP initial application with a *Date of Certification* within [month] [year] from the eligibility system:
 - Case Number

- Date of Application
- Expedite Indicator
- Date of Certification
- Date of Issuance
- Number of Days (from Date of Application to Date of Issuance)
- Timeliness Determination

Data Analysis

- Determine Expedited Timeliness:
 - For records with an expedited indicator, determine the number of days from the Date of Application to the Date of Issuance. If the number of days is less than or equal to 7, flag as timely. If not, flag as untimely.
- Determine Regular Timeliness:
 - For records without an expedited indicator, determine the number of days from the Date of Application to the Date of Issuance. If the number of days is less than or equal to 30, flag as timely. If not, flag as untimely.
- Determine # of Applications Approved Timely:
 - Count the number of records flagged as timely.
- Determine Total Applications Approved:
 - Count the number of records flagged as both timely and untimely.

Calculate APT Rate

- Divide the # of Applications Approved Timely by the Total Applications Approved. Multiply this number by 100 to get that month's APT rate.

Example State Agency Data Pull

All applications with a certification date within the month of April 2023.

Determine Timeliness (columns in red)

Case Number	Date of Application	Expedite Indicator	Date of Certification	Date of Issuance	# of Days	Timely?
2345678	4/3/2023		4/28/2023	5/1/2023	28	Yes
3456789	3/24/2023		4/10/2023	4/11/2023	18	Yes
4567890	4/5/2023	x	4/7/2023	4/10/2023	5	Yes
5678901	3/3/2023		4/3/2023	4/4/2023	32	No
7890123	2/17/2023		4/14/2023	4/17/2023	59	No
8901234	4/3/2023	x	4/10/2023	4/11/2023	8	No

Determine Numerator and Denominator

Number of applications approved timely = 3 (Numerator)

Total number of applications approved = 6 (Denominator)

Calculate APT Rate

APT Rate = $3/6 \times 100 = 50\%$

Monthly Timeliness Rate

For a monthly timeliness rate, the data for the numerator and denominator will be those applications approved within a month regardless of the date of application.

For example, if the State agency approved 10,000 applications in May and 9,000 of those approved applications were approved by the 7 or 30-day processing requirement, the State agency's APT rate would be 90 percent (9,000 divided by 10,000 = 0.90 x 100 = 90.00 percent).

6-Month Timeliness Rate

For a 6-month timeliness rate, the data for the numerator and denominator will be those applications approved over the 6-month period regardless of the date of application.

For example, if the State agency approved 150,000 applications between January and June and 100,000 of those approved applications were approved by the 7 or 30-day processing requirement, the State agency's APT rate would be 67 percent (100,000 divided by 150,000 = .6667 x 100 = 66.67 percent).

Data Provided to FNS

The State agency should provide FNS with the numerator and denominator for each month along with the calculated rate in Excel format.

For example: For a monthly timeliness rate, the State agency would submit the following report:

	March
Approved Timely	13,456
Total Approved	25,678
Rate	52.40%

For a 6-month timeliness rate, the State agency would submit the following report:

	March	April	May	June	July	August	Total
Approved Timely	13,546	12,980	15,691	15,908	16,023	14,307	88,455
Total Approved	25,678	26,871	25,487	25,558	24,601	25,866	154,061
6-month rate:							57.42%

When applicable, the State agency should submit reports that are broken down by county, region, or district/local office in order to better pinpoint areas of concern within the State agency.

Data Validation

The protocol below outlines how FNS will take steps to validate State agency data pulled under the [State Agency Timeliness Data Protocol](#).

Tier one data validation

After a State agency's first data submission using the State Agency Timeliness Data Protocol, FNS must assess the methodology the State agency is using to pull the timeliness data to make sure the State agency is using the protocol correctly. Some examples of questions to ask include:

- Does the data pull contain the entire caseload?
- Are all data elements present?
 - Case Number
 - Date of Application
 - Expedited Indicator
 - Date of Certification
 - Date of Issuance
 - Number of Days (from Date of Application to Date of Issuance)
 - Timeliness Determination
- What field is the State agency using to determine the application date?
- What indicator is the State agency using to determine expedited?
- What field is the State agency using to determine the certification date?
- Is the issuance date from the EBT system or eligibility system?
- Can FNS replicate the State APT rate from the data provided?

FNS must work with the State agency to clear any discrepancies noted during tier one data validation until FNS can consistently replicate the State APT rate.

Tier two data validation

FNS must complete this tier of validation before releasing a State agency from an APT CAP and the escalation procedures if using the State APT rate as the data source for release *and*

the data is inconsistent (+/- more than five percent) with the FNS APT for the same timeframe.

FNS should review enough cases (20-30) to confirm the State agency system is coding timeliness correctly. These cases need to be representative of each action type (e.g., timely expedited, untimely expedited, timely regular, untimely regular). FNS should select cases in an unbiased way, such as using a systematic random sample. The review consists of confirming the case record data for the sampled cases matches the information in the [State Agency Data Pull](#) for the following items:

- Case Number
- Date of Application
- Expedited Indicator
- Date of Certification
- Date of Issuance

FNS should address any errors identified with the State agency to resolve the State agency reported APT discrepancy for the sampled cases and similar cases. Once identified errors are resolved FNS should review an additional sample to confirm resolution.

Error Analysis (optional)

FNS may choose to conduct an error analysis at any time to help identify root causes of a State agency's poor APT rate. This will allow FNS to provide informed technical assistance and to confirm State agency corrective action initiatives are appropriate. Error analysis is not to validate the State agency QC decision for timeliness, or the State agency system timeliness coding, but to identify the reason the actions are untimely. While not all-inclusive, some common reasons include:

- File date entered incorrectly,
- Failed to identify eligibility for expedited benefits,
- Failed to properly pend for missing verification,
- Untimely issuance (processed timely but client does not have access to benefits), or
- Started action too late to process timely. Note: This is a good indicator of workload management and/or staffing issues.

Error Analysis of QC "Untimely"

This review is most beneficial just before, or when first requesting a corrective action plan from the State agency. Additional information from the State agency is unnecessary when using QC cases for the review. FNS should review QC cases with Item 68. Timeliness of Application Processing (Expedited and 30-Day Requirement) coded "Not timely" to identify the reason the actions are untimely and common error trends the State should address in their corrective action plan.

Error Analysis of State Agency Data Pull “Untimely”

This review is beneficial when the State agency has made little or no timeliness improvement for six or more months after implementation of their corrective action plan. FNS should review enough untimely cases from the [State Agency Data Pull](#) to identify the reason the actions are untimely and common error trends the State agency still needs to address. The sample should only include untimely cases with expedited and regular actions represented proportionally. FNS should select cases in an unbiased way, such as using a systematic random sample. The size of the sample can vary based on historical knowledge of State agency timeliness trends and the scope of the current timeliness issues. For example, FNS may select and review an initial sample of 30-50 untimely actions which clearly identify error trends. However, if no trends emerge from the initial sample, an additional sample may help identify the common error trends the State agency needs to address.