



Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE

DATE: August 8, 2024

SUBJECT: Supplemental Nutrition Assistance Program (SNAP) - Guidance for Improving State Agency Recertification 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) recertification application processing timeliness (RPT) rates. This policy is effective January 1, 2025.

Low RPT rates have a real and significant impact on eligible households who struggle to put food on the table while their SNAP recertification applications are stalled. For households who depend on monthly SNAP issuance to make ends meet, an untimely recertification can affect their food budget as strongly as an untimely action on an initial application. State agencies must operate SNAP in a manner that ensures all eligible applicants receive benefits in a timely fashion. Timely recertification application processing is an essential element of good customer service and ensures households have access to essential nutrition assistance.

The Food and Nutrition Act of 2008 requires that households who file an application for recertification by the 15th day of the last month of the expiring certification period and complete all required actions are entitled to a decision by the end of their certification period. If eligible, the State agency must issue benefits to maintain the household's normal date of issuance. While States agencies are required to process all SNAP applications within the timelines provided in the statute, FNS considers a FNS RPT rate of 95 percent and above acceptable performance.

The RPT measure, collected through the Quality Control process, historically captured both agency-caused and client-caused delays that result in untimely benefit issuance. FNS will continue to collect, disaggregate, and report RPT data broken down by agency and client-caused delays to provide State agencies with technical assistance in reviewing potential root causes for delays. However, to trigger the escalation procedures, FNS will remove client-caused delays when calculating the RPT rate and use only agency-caused delays to monitor State agency compliance with statutory requirements.

These recertification escalation procedures utilize the same 5-Step Approach as the [Initial Escalation Procedures](#), issued August 3, 2023. While the process (See Attachment 1) serves to standardize escalation procedures, FNS may deviate from this process when a State agency's FNS RPT rate is particularly egregious, or because of other circumstances in the State agency, such as large backlog or major systems issues.

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There is built in flexibility for FNS to engage State agencies when FNS RPT rates fall below acceptable performance, while maintaining a standardized process. To appropriately target State agencies with chronic recertification timeliness issues evident at the time of this policy's effective date, FNS will immediately proceed to a RPT corrective action plan when a State agency has a FNS RPT rate below 90 percent for the two most recent consecutive quarters of data available as of the February 2025 quarterly report.

FNS will use the FNS RPT rate to initiate escalation procedures, as this measure reflects how well the State is meeting statutory requirements for recertification timeliness for households who have completed all required actions. However, FNS may use data from either the State RPT rate or FNS RPT rate to release the State from escalation. The State RPT rate aligns with how States report recertification timeliness on the FNS 366-B, Program Activity Statement. The State RPT rate will consider whether a recertification application was submitted timely or untimely, and how well the State met the appropriate regulatory timeframe for processing that application. (See Attachment 2)

The recertification escalation procedures include engaging in technical assistance, setting State agency-specific benchmarks for improvement, guidance on calculating a [State RPT rate](#), and data validation of State agency-generated RPT data. 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.

State agencies with questions should contact their Regional Office representatives.

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Attachments

Attachment 1: Guidance for Improving State Agency Recertification Application Processing Timeliness Rates: Understanding the Measure and Standardizing the Escalation Process

This document provides State agencies with guidance on the steps the Food and Nutrition Service (FNS) will take to improve Supplemental Nutrition Assistance Program (SNAP) recertification application processing timeliness (RPT) rates.

While the process serves to standardize escalation procedures, FNS may deviate from this process when a State agency's FNS RPT 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 Recertification Application Processing Timeliness?

The Food and Nutrition Act of 2008 requires that eligible households have the opportunity to participate in SNAP, defined as having been certified with access to their benefit allotment by their normal issuance date, if they file the recertification application by the 15th day of the last month of their expiring certification period and complete all required actions. Per Federal regulations at [7 CFR 273.14\(a\)](#), no household may participate beyond the expiration of its assigned certification period without a determination of eligibility for a new period.

How is Recertification Application Processing Timeliness Measured?

The FNS RPT measure has historically included both agency-caused and client-caused delays that result in untimely benefit issuance. FNS will continue to collect, disaggregate, and report FNS RPT data broken down by agency and client-caused delays to provide State agencies with technical assistance in reviewing potential root causes for delays. However, to trigger the escalation procedures, FNS will remove client-caused delays when calculating the FNS RPT rate and use only agency-caused delays to monitor State agency compliance with statutory requirements.

Using data from the Quality Control (QC) sample, the FNS RPT rate is derived by dividing the number of SNAP recertification applications approved timely for a given period of time (i.e., day, month, year, etc.) by the total number of recertifications approved within that same time period.

$$\text{FNS RPT Rate} = \frac{\text{\# Recertifications Approved Timely}}{\text{Total Recertifications Approved}} \times 100$$

FNS shares quarterly FNS RPT data for each State agency via the PartnerWeb. 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.

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Nonetheless, the data can be effective in flagging timeliness problems, particularly because in many cases timeliness issues develop and persist over time.

FNS will publish an annual FNS RPT rate for each State agency in July of each year. This annual FNS RPT rate reflects the State agency's RPT from the previous fiscal year. **If the annual FNS RPT rate is below 90 percent, the State agency will be required to take corrective action¹.**

In addition to the FNS RPT rate, State agencies may also generate their own State RPT rate. State RPT rates are often more readily available than the FNS RPT rate. The [State Agency Recertification Timeliness Data Protocol](#) outlines how to calculate the State RPT rate.

Poor Recertification Timeliness Escalation Procedure: The 5-Step Approach

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

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

[Step 2: RPT Corrective Action Plan \(CAP\)](#)

[Step 3: Advance Warning Letter \(AWL\)](#)

[Step 4: Formal Warning Letter \(FWL\)](#)

[Step 5: Sanction Administrative Funding](#)

Escalation Procedures Rollout

To appropriately target State agencies with chronic timeliness issues as of this policy's effective date, State agencies with an FNS RPT rate below 90 percent for the two most recent consecutive quarters available as of the February 2025 quarterly report, will immediately proceed to Step 2. State agencies where only the most recent quarter of RPT data is below 90 percent, as of the February 2025 quarterly report, will follow Step 1.

Step 1: Pre-escalation and Identification

FNS will use either the annual or quarterly FNS RPT rate to initiate the escalation process. The first time a State agency has a FNS RPT rate below 90 percent on a QC quarterly report, FNS will inform the State agency and offer technical assistance to identify the root cause(s) of poor recertification timeliness and methods to improve timeliness.

¹ FNS calculates a 95 percent confidence interval surrounding FNS Timeliness rates point estimates to account for differences in the size of the QC samples. Unlike the FNS Application Processing Timeliness rate, the point estimate, rather than the upper bound of the confidence interval, is used to identify and monitor timeliness for the FNS RPT rate.

If the State agency's FNS RPT rate falls below 90 percent for a second consecutive quarter, FNS will request a recertification timeliness-specific corrective action plan (RPT CAP).

While two consecutive quarters below 90 percent indicates a trend of poor performance, FNS also recognizes that large drops in recertification timeliness between quarters warrants immediate attention. FNS reserves the right to immediately engage in the escalation procedures and request a RPT CAP for any State agency whose FNS RPT falls below 80 percent in a single quarter.

FNS will not use State agency-generated recertification timeliness data to initiate the RPT escalation process.

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

Step 2: RPT CAP

When a State agency has a FNS RPT rate below 90 percent for two consecutive quarterly reports, FNS will require the State agency to create or update a RPT CAP. State agencies may combine the RPT CAP with their Application Processing Timeliness (APT) CAP when the root cause of errors can be addressed with the same corrective actions. FNS expects to see continuous improvement in RPT rates. If a State agency fails to make sufficient progress towards benchmarks within the RPT CAP, State agencies may be escalated.

Benchmarks

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

Benchmarks may include:

- Achieving an intermediary RPT rate (e.g., 90 percent),
- Improving a RPT rate by a certain percentage, or
- Clearing a backlog in recertification 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 a RPT CAP. FNS can provide technical assistance to the State agency in identifying the root cause(s) of the RPT 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 RPT performance; discuss waivers and State options that may assist timeliness; and provide consultation on business process reengineering (BPR).

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

With the submission of its initial RPT CAP, the State agency may present FNS with State agency calculated RPT data following the [State Agency Recertification Timeliness Data Protocol](#) (Attachment 2) 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 RPT CAP and may guide FNS in its review of the RPT CAP. FNS will review this data to ensure the State agency collects it in accordance with the State Agency Recertification Timeliness Data Protocol and other applicable standards.

State agencies must submit ongoing updates to their RPT 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 RPT CAP and any effect the activity has made on its RPT rate. FNS will review each State agency's update and may adjust milestones to encourage progress towards a RPT rate of 95 percent. FNS will communicate any new or adjusted benchmarks in its response to each RPT CAP update.

Release from RPT CAP

FNS will release the State agency from the RPT CAP when the State agency has an FNS RPT rate of 95 percent for two consecutive quarterly reports or State agency data following the [State Agency Recertification Timeliness Data Protocol](#) (Attachment 2) validated by FNS shows a State RPT rate of 95 percent for 6 consecutive months. If there is a significant discrepancy between the FNS and State RPT 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 RPT CAP.

Step 3: Advance Warning Letter (AWL)

When a State fails to meet benchmarks set by FNS through the [RPT CAP](#) process, or refuses to engage in the RPT CAP process, FNS will send an AWL 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 (FWL) if it does not meet the benchmarks outlined in the AWL by the specified timeframe. FNS expects

to see continuous improvement in RPT rates. If a State agency fails to progress to the satisfaction of FNS, FNS may escalate to an FWL. FNS may also issue a FWL without first issuing an AWL to expedite the escalation procedure after noncompliance or lack of progress during the RPT CAP stage.

Benchmarks

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

State agencies that previously refused to engage in the RPT CAP process must submit a RPT CAP to FNS within 30 calendar days of receipt of the AWL.

Revised Corrective Action Plan

State agencies that failed to meet benchmarks of their RPT CAP must revise their RPT CAP and submit it to FNS within 30 calendar days of receipt of the AWL. The revised RPT 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 RPT CAP and provide feedback and guidance to the State agency. FNS will accept the RPT 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 RPT 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 RPT CAPs including the use of State agency-calculated recertification 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 RPT rate. FNS will 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 RPT CAP and Escalation

FNS will release the State agency from the RPT CAP and escalation procedures when the State agency has a FNS RPT rate of 95 percent for two consecutive quarterly reports or State agency data following the [State Agency Recertification Timeliness Data Protocol](#) (Attachment 2) validated by FNS shows a State RPT 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 RPT CAP and escalation procedures.

Step 4: Formal Warning Letter (FWL)

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

Benchmarks

FNS will set the benchmark(s) and associated timeframes through review of RPT data and current circumstances. Refer to [Revised Corrective Action Plan](#) under Step 3 for details on revising the RPT CAP. Refer to [Benchmarks](#) under Step 2 for details.

Revised Corrective Action Plan

The State agency must revise its RPT 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 the State agency to review State calculated RPT rates, metrics, and progress towards meeting RPT CAP benchmarks, and tailor any additional action or technical assistance provided to the State agency's needs.

Release from RPT CAP and Escalation

FNS will release the State agency from the RPT CAP and escalation procedures when the State agency has an FNS RPT rate of 95 percent for two consecutive quarterly reports or State agency data following the [State Agency Recertification Timeliness Data Protocol](#) (Attachment 2) validated by FNS shows a State RPT 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 RPT CAP and escalation procedures.

Step 5: Sanction Administrative Funding

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

Attachment 2: State Agency Recertification Timeliness Data Protocol

This data protocol provides State agencies guidance on how to gather certification data to generate their own State Recertification Application Processing Timeliness (RPT) rate. State RPT rates can often be calculated and made available more readily than the FNS RPT rate.

The State RPT rate differs from the FNS RPT rate in several ways.

- This protocol uses the entire universe of State agency SNAP cases recertified in a given period of time instead of a sample of active case files like the FNS RPT rate.
- The FNS RPT rate excludes untimely cases with client-caused delays (e.g. applications filed after the 15th day of the last month of the expiring certification period, missed interview), while the State RPT rate accounts for these untimely applications.
- Lastly, similar to FNS-366B reporting, the State RPT rate will be based on the decision to approve benefits in relation to the date of application without regard for the availability of benefits, as measured by the FNS RPT rate.

Using certification data instead of reviewing a sample of cases during a case file review allows the State agency to generate a State RPT 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 RPT performance. FNS will validate State RPT rates by following the procedures outlined in the [Data Validation](#) section of this Protocol.

State RPT Rate Formula

A State agency calculates the State RPT rate by dividing the number of SNAP recertification applications approved timely for a selected period of time (i.e., day, month, year, etc.) by the total number of recertification applications approved within that same time period.

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

Definitions

\# of Recertification Applications Approved Timely: Within a specified timeframe, the number of SNAP recertification applications certified:

- By the end of the expiring certification period, for recertification applications received by the 15th of the last month of the expiring certification,
- By the State policy due date, for recertification applications received between the 16th and the end of the expiring certification period, and

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- By the 30th day from the date of application, or the 7th day for applicants that meet expedited service criteria, for recertification applications received after the end of the certification period but within 30 days after the certification period expires.

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

Date of Certification: The date the State agency certifies a SNAP Recertification Application for SNAP.

FNS RPT Rate: FNS Recertification Processing Timeliness (RPT) rate is the percent of a State's certified SNAP recertification applications approved within SNAP statutory processing requirements (minus client-caused delays).

State RPT Rate: State Recertification Processing Timeliness (RPT) rate is the percent of a State's certified SNAP recertification applications approved within SNAP regulatory processing requirements.

SNAP Recertification: Recertification is the process by which a State agency determines eligibility for active SNAP households prior to the end of households' current certification period. The recertification process mirrors the certification process and shares a similar objective of eligibility determination and accurate allotment determinations for eligible households.

Timely Recertification Application: An application for recertification received by the State agency by the 15th day of the last month of the certification period.

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

Untimely Recertification Application: An application for recertification received by the State agency after the 15th day of the last month of the expiring certification period, but no more than 30 days after the certification period expires.

Gathering and Analyzing the Data

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

Collect the following data elements for any SNAP recertification application with a Date of Certification within [month] [year] from the eligibility system:

- Case Number

- Last Month of (the Expiring) Certification Period
- Date of Application
- Timely Filed Determination (Y/N)
- Expedite Indicator (Y/N)
- Date of Certification
- Number of Days (from Date of Application to Date of Certification)
- Timeliness Determination (Timely/Untimely)

Data Analysis

Timely Filed Determination

- For records with Date of Application less than or equal to the 15th day of the Last Month of the Expiring Certification Period: Timely Filed = Y
- For records with Date of Application after the 15th day of the Last Month of the Expiring Certification Period, but within 30 days after the certification period expires: Timely Filed = N

Recertification Timeliness Determination

- For records with Date of Application less than or equal to the 15th day of the Last Month of the Expiring Certification Period (Timely Filed = Y), if the Date of Certification is less than or equal to the last day of the expiring certification period, flag as timely. If not, flag as untimely.
- For records with Date of Application after the 15th day of the Last Month of the Expiring Certification Period (Timely Filed = N), but less than or equal to the last day of the expiring certification period, if the Date of Certification is less than or equal to the State policy due date, flag as timely. If not, flag as untimely.
- For records with Date of Application after the last day of the expiring certification period but within 30 days after the certification period expires:
 - Determine Recertification Expedite Timeliness: For records with an expedite indicator, determine the number of days from the Date of Application to the Date of Certification. If the number of days is less than or equal to 7, flag as timely. If not, flag as untimely.
 - Determine Regular Recertification Timeliness: For records without an expedite indicator, determine the number of days from the Date of Application to the Date of Certification. If the number of days is less than or equal to 30, flag as timely. If not, flag as untimely.

- Determine # of Recertification Applications Approved Timely:
 - Count the number of records flagged as timely.
- Determine Total Recertification Applications Approved:
 - Count the number of records flagged as both timely and untimely.

Calculate State RPT Rate

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

Example State Agency Data Pull

All recertification applications with a certification date within the month of April 2024.

Determine Timeliness (columns in red)

Case Number	Last Month of Certification	Date of Application	Timely Filed?	Expedite Indicator	Date of Certification	# of Days	Timely?
6783478	4/2024	4/1/2024	Y		4/30/2024	29	Yes
3454922	3/2024	3/15/2024	Y		4/9/2024	25	No
8789350	3/2024	4/5/2024	N	x	4/9/2024	4	Yes
9056781	2/2024	3/5/2024	N		4/4/2024	30	Yes
7128903	2/2024	2/20/2024	N		4/16/2024	57	No
8123904	3/2024	4/3/2024	N	x	4/11/2024	8	No

Determine Numerator and Denominator

Number of recertification applications approved timely = 3 (Numerator)

Total number of recertification applications approved = 6 (Denominator)

Calculate State RPT Rate

State RPT Rate = $3/6 \times 100 = 50\%$

Monthly State RPT Rate

For a monthly State RPT rate, the data for the numerator and denominator will be those recertification applications approved (Date of Certification) within the report month regardless of the date of application.

For example, if the State agency approved 10,000 recertification applications in May and 9,000 of those approved recertification applications were approved by the processing requirement date, the State RPT rate would be 90 percent (9,000 divided by 10,000 = 0.90 x 100 = 90.00 percent).

6-Month State Recertification Timeliness Rate

For a 6-month State RPT rate, the data for the numerator and denominator will be those recertification applications approved (Date of Certification) over the 6-month report period regardless of the date of application.

For example, if the State agency approved 150,000 recertification applications between January and June and 100,000 of those approved recertification applications were approved by the processing requirement date, the State RPT 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 recertification 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 recertification timeliness rate, the State agency would submit the following report:

	March	April	May	June	July	August	6-Month Total
Approved Timely	13,456	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
Rates:	52.40%	48.30%	61.56%	62.24%	65.13%	55.31%	57.42%

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

Data Validation: Recertification Timeliness

The protocol below outlines how FNS will validate State agency data pulled under the State Agency Recertification Timeliness Data Protocol.

Tier one data validation

After a State agency's first data submission using the State Agency Recertification Timeliness Data Protocol, FNS must assess the methodology the State agency is using to pull the RPT 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
 - Last Month of (the Expiring) Certification Period
 - Date of Application
 - Timely Filed Determination (Y/N)
 - Expedite Indicator (Y/N)
 - Date of Certification
 - Number of Days (from Date of Application to Date of Certification)
 - Timeliness Determination (Timely/Untimely)
- 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?
- Can FNS replicate the State RPT rate from the data provided?

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

Tier two data validation

FNS will complete this tier of validation before releasing a State agency from a RPT CAP and the escalation procedures if using the State RPT rate as the data source for release and the data is inconsistent (+/- more than five percent) with the FNS RPT for the same timeframe.

FNS will review enough cases (20-30) to confirm the State agency system is coding RPT correctly. These cases need to be representative of each action type (e.g., timely expedited, untimely expedited, timely regular, untimely regular).

FNS will 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
- Last Month of (the Expiring) Certification Period
- Date of Application
- Timely Filed Determination (Y/N)
- Expedite Indicator (Y/N)
- Date of Certification
- Number of Days (from Date of Application to Date of Certification)
- Timeliness Determination (Timely/Untimely)

FNS will address any errors identified with the State agency to resolve any State RPT discrepancies 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 RPT 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 Quality Control (QC) decision for recertification timeliness, or the State agency system recertification 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, 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 will review QC cases with Item 70. Timeliness of Recertification Processing 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 RPT improvement for 6 or more months after implementation of their corrective action plan. FNS will 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 applications processed untimely with timely and untimely received recertification applications represented proportionally. FNS will 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 RPT 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.