



Food and
Nutrition
Service

1320 Braddock Place
Alexandria, VA
22314

DATE: December 8, 2022

SUBJECT: Supplemental Nutrition Assistance Program – Quality Control
Review Clarification for Cases with Back-to-Back Certification
Extensions in 2020 or 2021, Quality Control Policy Memo 23-03

TO: All SNAP State Agencies
All Regions

The Food and Nutrition Service (FNS) determined there are Quality Control (QC) cases in the Fiscal Year 2022 active frame with back-to-back certification period extensions that have been treated inconsistently by QC reviewers. This memo is intended to clarify the QC procedures for cases that were impacted by these extensions.

The relevant authorities and adjustment periods under which certification period extensions were allowed are: the Families First Coronavirus Response Act (P.L. 116-127) (FFCRA) adjustments permitted by FNS beginning in March 2020; options allowed by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159) (CR) beginning in October 2020; and the return to FFCRA adjustments permitted by FNS as early as April 2021.

Back-to-back certification period extensions for households were permissible, provided that the extensions either did not exceed 6 months total or, if they did, were provided under different statutory authorities or adjustment periods. Therefore, the existence of back-to-back certification period extensions does not automatically indicate that a case was ineligible. QC reviewers must determine when and under what authority or adjustment period each extension was granted to determine whether a case was ineligible.

Cases that received multiple back-to-back certification period extensions provided under the same statutory authority or adjustment period are ineligible if the extensions totaled more than 6 months. For example, if a case received a 6-month extension under FFCRA in April 2021, then was extended again without a recertification in October 2021, the case would be ineligible after the second extension. However, for cases such as this, that received back-to-back extensions under the FFCRA adjustment period exceeding 6 months total from April 2021 to December 2021, QC reviewers should apply a variance exclusion pursuant to regulations at 7 CFR 275.12(d)(2)(viii).

The attachment to this memo informs QC reviewers how to proceed with the review of cases affected by back-to-back certification period extensions and how to identify whether a case was eligible or ineligible.

State agencies with questions should contact their respective Regional Office representatives.

/s/

Rachel Frisk
Director
Program Administration and Nutrition Division
Supplemental Nutrition Assistance Program

/s/

Sasha Gersten-Paal
Director
Program Development Division
Supplemental Nutrition Assistance Program

Enclosure

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Enclosure

Determining Whether an Extended Certification was Allowable

Please use the below chart, in conjunction with the State's various approvals, when indicated, to determine whether cases received allowable back-to-back certification period extensions. If a case was granted an extended certification that was not allowable, the case must be determined ineligible.

Authority	When Authority Could be Exercised	Condition of Approval
Families First Coronavirus Response Act (FFCRA)	March 2020—June 2020 Extend-Certification-Periods-PR-June-2020.pdf (azureedge.us)	State agencies were required to notify FNS of the certification period extension blanket adjustment. Adjustment approval from FNS indicates allowable months.
	July 2020-September 2020	State agencies were required to request a separate certification period extension adjustment for these months. Adjustment approval from FNS indicates allowable months. Note that more than one adjustment approval may exist for this period.
Continuing Appropriations Act, 2021 and Other Extensions Act (CR)	October 2020- June 2021 https://www.fns.usda.gov/sites/default/files/resource-files/pl_116-159.pdf	All State agencies were allowed to extend certification periods for cases that expired in the provided months for up to six months. State agencies were not required to request approval from FNS.

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FFCRA	As early as April 2021 through December 2021 Extension of SNAP COVID-19 Administrative Flexibilities May 2021 and Beyond (azureedge.us)	State agencies were required to request a separate certification period extension adjustment for this period. Adjustment approval from FNS indicates allowable months. Back-to-back adjustments that occur under this authority and during this adjustment period should be excluded as a variance exclusion through December 2021.
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Case Identification and Correction:

Fiscal Year 2022 QC cases determined ineligible due to back-to-back certification period extensions prior to this memo must be reexamined to ensure the accuracy of the ineligible determination and to determine whether a variance exclusion applies. The process to correct these cases will depend upon the status of the case. The following information is intended to help Federal and State QC reviewers understand how to process a case requiring a correction.

Cases Subsampled by FNS:

Cases submitted to FNS that have not been reviewed by FNS:

FNS reviewers will complete their reviews and determine whether a certification period extension was allowable using the information in the above chart.

Cases submitted to FNS that have been reviewed by FNS and were determined ineligible:

FNS will screen all completed subsampled cases that were determined ineligible to identify whether the review needs to be revised based on the information in this memo. For cases identified for revision, FNS will create a separate Excel spreadsheet for each State that contains the review number, sample month and year, and sub-sample status of every impacted case and send it to the SNAP-QCS Helpdesk (sm.fn.snapqcs-support@usda.gov) within 10 business days of the publication on this memo.

The SNAP-QCS Helpdesk will unlock the listed cases for each State agency, allowing State agencies until January 23, 2023, to complete the cases. FNS will have the full re-review period of 70 days for cases completed by the State agency. All normal arbitration rights will apply. Any cases left incomplete will count toward the State's incompleteness rate.

Cases Not Subsampled by FNS:

Cases that have not been reviewed by the State:

State agencies will complete their reviews and determine whether a certification period extension was allowable using the information in the above chart. The QC review record for cases held must be documented to indicate that the case was held per FNS guidance to ensure a full 20-day arbitration period upon completion, even when the case appears late in SNAP-QCS.

Cases submitted to FNS that have been reviewed by the State and were determined ineligible:

State agencies should search in SNAP-QCS for all completed cases that were determined ineligible and identify whether the review needs to be revised based on the information in this memo. For cases identified for revision, State agencies must create an Excel spreadsheet with the review number, sample month and year, and sub-sample status for every impacted case and send it to the SNAP-QCS Helpdesk (sm.fn.snapqcs-support@usda.gov) within 10 business days of the publication of this memo. The SNAP-QCS Helpdesk will unlock all listed cases, allowing State agencies until January 23, 2023, to correct and complete these cases. All normal arbitration rights will apply. Any cases left incomplete will count toward the State's incompleteness rate.