



Food and
Nutrition
Service

Park Office
Center

3101 Park
Center Drive
Alexandria
VA 22302

Date: June 2, 2017

SUBJECT: Clarification on the three ways initial SNAP application processing timeliness is measured

TO: All Regional Directors
Supplemental Nutrition Assistance Program (SNAP)

The memorandum that follows is intended to clarify the three ways in which the Food and Nutrition Service (FNS) measures timeliness of initial Supplemental Nutrition Assistance Program (SNAP) application processing. This memorandum does not represent new policy, but seeks to clarify the three existing data collection and monitoring procedures. These procedures are: the Application Processing Timeliness (APT) rate calculated from the Quality Control (QC) active case sample, the State Timeliness rate calculated from the universe of State data, and 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 timeliness through management evaluation reviews, advocate and client complaints, and other modes of information gathering.

The Food and Nutrition Act of 2008, as amended (the Act), entitles all eligible households to benefits within 30 days of application, or within 7 days, if they are eligible for expedited service. Although State agencies process the majority of SNAP applications within these timeframes, the data collection processes outlined in this memorandum allow FNS to identify and monitor States that struggle to consistently process applications timely.

Each method offers both strengths and challenges. In practice, FNS has found that these methods complement each other and, when taken together, provide a more complete picture of timeliness in a State. The three data collection methods are described below.

FNS Application Processing Timeliness Rate

Purpose

Each State agency is responsible for conducting QC reviews as part of its Performance Reporting System. QC reviews are based on two samples. The active case sample includes households participating in SNAP, and the negative case sample includes households that were denied, suspended, or terminated. As part of the review of participating households, QC reviewers collect information on whether or not initial applications sampled as part of the review were processed timely.

USDA is an Equal Opportunity Provider, Employer and Lender

Guidance documents lack the force and effect of law, unless expressly authorized by statute or incorporated into a contract. USDA may not cite, use, or rely on any guidance that is not available through their guidance portal, except to establish historical facts.

The FNS APT rate derived from cases in the QC sample was originally designed to identify States eligible for high performance bonuses. The same information is also used to identify States with poor timeliness. The FNS APT rate is one of the sources of timeliness data cited in the timeliness escalation procedures published in the *Guidance for Improving State Timeliness Rates and Standardizing the Escalation Procedures* on March 16, 2016.

Data Source

Cases included in the QC sample for the FNS APT rate calculation are a sub-set of the active cases pulled for QC review. Every month, QC pulls a specified number of active cases for review. In order for these cases to be included in the FNS APT rate calculation, a case must have been completely processed (from the start of the application through to the opportunity to participate) within the sample fiscal year. There are several types of cases that are not included in the FNS APT rate calculation: negative cases, cases pended for missing verification, and cases that were not completely processed in the fiscal year under review. For more information on cases excluded from the sub-sample used for the FNS APT rate calculation, see the FNS 310 Handbook.

Data Use

Using data from the sub-set of active cases pulled for QC review, the FNS APT rate is derived by dividing the number of 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.

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

FNS calculates a 95 percent confidence interval surrounding the FNS APT rate point estimate. The upper bound of the confidence interval, rather than the point estimate, is used to identify and monitor poor timeliness. If the upper bound of the confidence interval is below 90 percent, the State agency is required to take corrective action.

Timetable for Availability

Quarterly data represents a rolling 6-month average; however, there is a lag of approximately 4 months between the time the data is collected and its publication. Cases included in the 6-month period under review are cases that were pulled for review during the corresponding sample months. As a result, cases included in the rolling 6-month periods may have been processed in that sample month or in a previous sample month of that fiscal year. The four 6-month rolling periods over which the FNS APT rate is calculated are: January through June; April through September; July through December; and October through March. FNS also calculates a fiscal year APT rate, made available approximately 6 months from the close of that fiscal year.

State Timeliness Data Protocol

Purpose

In addition to the FNS APT rate from the QC sample, States may also generate their own APT rate. State APT rates provide a reasonable approximation of the FNS APT rate, and can often be calculated and made available more readily than the FNS APT rate. The State Timeliness Data Protocol outlines how to calculate the State APT rate and is included in the timeliness escalation procedures published in the March 16, 2016, guidance.

Data Source

The State APT rate is similar to the FNS APT rate. The major difference is that the FNS APT rates are calculated using a sample of case files while the State APT rate includes the entire universe of State SNAP cases for a given period of time. Since the entire universe of the State's SNAP cases is included in the State APT rate, the rate does not include a 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 State 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.

The State APT rate is calculated by dividing the number of initial SNAP applications approved timely within the 7- or 30-day processing requirement, according to the APT Protocol by the total number of applications approved within the same timeframe, and multiplying by 100.

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

Data Use

The State APT rate is used by the State and FNS to initiate the escalation process, identify a timeliness problem, and/or monitor progress towards the achievement of benchmarks. If the FNS APT rate indicates timeliness below 90 percent, the State may be required to calculate the State APT according to the State Timeliness Data Protocol as described in the escalation procedures outlined in the March 16, 2016, guidance. Similarly, if the State has developed a corrective action plan, the State must use the State Timeliness Data Protocol to compute and analyze timeliness data for its entire caseload as part of FNS' monitoring efforts.

Timetable for Availability

Since the State agency has access to the data required to compute the State APT rate, this measure can be calculated at any time based on State resources.

FNS Program and Budget Summary Statement, Part B-Program Activity Statement (FNS-366B)

Purpose

The Certification Section of the FNS Program and Budget Summary Statement, Part B-Program Activity Statement (FNS-366B) tracks the number of initial and recertification applications approved or denied by the State agency in the specified reporting quarter, excluding withdrawals and disaster applications. This form also tracks the number of applications that were approved and received expedited service. Approvals include all applications that were processed to a determination. Denied applications only include applications that were denied due to ineligibility. Denied applications do not include closed cases. The form also records the number of approved overdue applications, defined as those approved more than 30 days (or 7 days for expedited application) from the date of application.

Data Source

The FNS-366B is completed by State agencies quarterly with all of applications approved or denied recorded in the appropriate column. If an initial application was approved during that quarter, it is counted in the “Approved” column for the FNS-366B. The State must then determine how many days transpired between the initial date of application and the date a decision was made on that case. If more than 30 days transpired (or 7 days for expedited cases), then the FNS-366B directs the State to record the case in one of the overdue columns.

Data Use

The FNS-366B tracks application decisions that were overdue by 1-30 days, 31-60 days, 61-90 days, and 91 days or more. The use of the term “overdue” is intended to distinguish the information collected on the FNS-366B from timeliness data collected in other modes of program oversight discussed above.

For the purposes of the FNS-366B, an initial regular application is overdue if the approval determination is made more than 30 days from the date of application, regardless of the reason for the delay. Initial expedited applications are overdue if an approval determination is made more than 7 days from the date of application.

On January 11, 2017, FNS released a memorandum, *Clarifications for Reporting on the Certification Section of the FNS-366B*. The memorandum provides more information about FNS’s definition of the term “overdue” for FNS-366B purposes and includes a discussion of the differences between “overdue” on the FNS-366B and “untimely” in QC reviews.

Timetable for Availability

State agencies are required to submit the FNS-366B quarterly, based on the Federal Fiscal Year. An August 3, 2016, memorandum, *FNS-366B Revision Implementation - Instructions for Transition to Quarterly Reporting on the Federal Fiscal Year*, transitioned State agencies from annually reporting based on the State’s Fiscal Year to quarterly reporting based on the Federal Fiscal Year. As of October 1, 2016, all State agencies must certify quarterly FNS-366B reports on February 1 for Quarter 1, May 1 for Quarter 2, August 1 for Quarter 3 and November 1 for Quarter 4.

All Regional Directors
Page 6

If you have questions about any of these timeliness measures, please contact Sarah Goldberg via email at Sarah.Goldberg@fns.usda.gov or by phone at 703-305-4397.

Sincerely,

A handwritten signature in black ink that reads "Lizbeth Silberman". The signature is written in a cursive style with a long horizontal flourish at the end.

Lizbeth Silberman
Director
Program Development Division