

# **FIELD OPERATIONS BUREAU**

## **CalFresh Review Unit (CFRU)**

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**TRANSMITTAL NUMBER: 12-04**

**December 18, 2012**

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**TO: All Food Assistance Action Committee (FAAC)  
Members and Field Operations Bureau (FOB) staff**

**SUBJECT/PURPOSE: Steps to Measure Recertification Timeliness for  
Active Cases**

**RELATED REFERENCE: USDA Administrative Notices 12-03 and 13-05,  
FNS Handbook 310, Appendix C, Section 6, #70**

**SUPERSEDES: None**

**EFFECTIVE DATE: Beginning with October 2012 Sample**

### **BACKGROUND:**

The purpose of this transmittal is to provide instructions on the coding requirements for recertification actions on active reviews. USDA's Administrative Notice 12-03 informed State agencies that starting in Fiscal Year 2013 Federal Nutrition Services (FNS) would begin to monitor timeliness of recertification actions. According to Section 11(e)(4) of the Food and Nutrition Act of 2008 (the Act) SNAP/CalFresh households (CFHH) are entitled to a timely recertification and a limited period of eligibility. The Act requires State agencies to notify the household that its certification period is ending prior to the last month of the certification period. It also requires State agencies to provide eligible households with benefits no later than one month after the last allotment was received.

### **INSTRUCTIONS:**

Beginning with the October 2012 sample Quality Control (QC) reviewers will be required to review active cases in which a recertification was taken for, or prior to the sample month. If there is more than one recertification action, use the most recent recertification application for or prior to the sample month.

**ITEM 010 - F018 was added** to the RADEP worksheet to capture the timeliness of recertification. In order to ensure the correctness of the timeliness of application coded on Item 010-F018, the QC file must contain verification/documentation substantiating the coding. Some examples of required documents are the Notice of Expiration of Certification (NEC), recertification application, case comments/journal, Notice of Approval (NOA), Issuance History, or EBT Transaction screen shots showing the date the allotment was posted, etc.

Attached to this transmittal are FNS Q & A (Attachment A), and a Documentation Tool that will assist the reviewer in correctly documenting recertification timeliness (Attachment B). This tool can be included as part of the QC file.

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## **DEFINITION OF CODES**

### **Code 01: Timely**

- If the CFHH was recertified within 12 months prior to the QC sample month and if the CFHH received benefits by the normal issuance cycle.

### **CODES 11-13: NOT TIMELY – AGENCY CAUSED**

#### **Code 11: Agency failed to contact or did not contact CFHH timely.**

This would include situations in which the agency failed to contact or did not contact the client timely with NEC, recertification packet, to schedule interview, or request verification.

- Timely NECs are sent before the first day of the last month of the certification period.
- Timely recertification packets are sent before the first day of the last month of the certification period.
- Timely interviews are scheduled 10 days before the end of the certification period.
- Timely requests for verification occur 10 days before the end of the certification period.

#### **Code 12: Agency lost or misfiled the verification or application for recertification.**

This would include any lost or misfiled application completed or otherwise.

#### **Code 13: Agency failed to act on completed recertification application.**

This would include any completed recertification application that a caseworker failed to act on for whatever reason. This code is a catch-all code that is used when codes "11" or "12" do not apply.

### **CODES 24-27: NOT TIMELY - CLIENT CAUSED**

#### **Code 24: CFHH did not file the recertification application by the 15<sup>th</sup> of the last month of the certification period.**

#### **Code 25: CFHH missed the first scheduled interview.**

#### **Code 26: CFHH did not return the required verification timely. Verification must be returned by the end of the certification period.**

#### **Code 27: Other CFHH caused delay.**

### **CODES 30-50: NO RECERTIFICATION ACTION WAS TAKEN**

**Code 30:** Benefits issued outside of the certification period.

**Code 40:** Not yet due for recertification.

**Code 50:** No recertification within the last 12 months prior to the sample month.

### **STEPS TO DETERMINE TIMELINESS CODING**

**STEP 1:** Did the CFHH receive benefits after the certification period expired (the CFHH was not recertified)?

- If YES, stop and code as “Benefits Issued Outside of the Certification Period” (**Code 30**)
- If NO, go to Step 2

**STEP 2:** Was the CFHH recertified?

- If YES, go to Step 3
- If NO, stop and code as “Not yet Due for Recertification” (**Code 40**)

**STEP 3:** Was the CFHH recertified within the 12 months **prior to** the QC sample month?

- If YES, go to Step 4
- If NO, stop and code as “No Recertification within the 12 Months Prior” (**Code 50**)

**STEP 4:** Did the CFHH receive benefits by the normal issuance cycle?

- If YES, stop and code as “Timely” (**Code 01**)
- If NO, go to Step 5

**Please note that all cases that proceed beyond Step 4 are considered untimely. For all cases untimely, please indicate the cause for the delay. If multiple causes are identified, please indicate the cause that comes first in the steps below. For example, if the agency sent out the NEC late *and* the agency lost the completed recertification application, the reviewer should code “11”.**

**STEP 5:** Was the NEC sent out timely (before the first day of last month of the certification period)?

- If YES, go to Step 6
- If NO, stop and code as “Not Timely - Agency Caused Delay”  
**(Code 11-13)**

**STEP 6:** Was the recertification application filed by the 15<sup>th</sup> of the month, interview completed and all appropriate verification submitted by the end of the certification period?

- If YES, stop and code as “Not Timely – Client Caused Delay”  
**(Code 24-27)**
- If NO, go to Step 7

**STEP 7:** Was the CFHH given the opportunity to file the recertification by the 15<sup>th</sup> of the month? If the CWD starts the recertification process by scheduling the telephone interviews, was the interview scheduled by the 15<sup>th</sup>? OR, if the recertification packet was mailed out, was it mailed out with sufficient time for the CFHH to mail it back by the 15<sup>th</sup> of the month? And, was the CFHH given at least 10 days to provide all required verification?

- If YES, stop and code as “Not Timely – Client Caused Delay”
- If NO, stop and code as “Not Timely – Agency Caused Delay”

# ATTACHMENT A

## Q & A on Recertification Timeliness Measure from Administrative Notice 13-05

### Application Processing and Recertification Timeliness Measures

*Question 1:* The application processing timeliness measure (Item 010-F013) only looks at applications processed within the current fiscal year (FY) under review. The guidance for the recertification timeliness measure (Item 010-F018) appears to be asking reviewers to review recertification actions that occurred during the past 12 months, regardless of FFY. Is this correct?

*Answer:* 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 010-F018) affect the way reviewers review cases for application processing timeliness (Item 010-F013)?

*Answer:* No. Reviewers will continue to review for application processing timeliness (Item 010-F013) 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 010-F018)?

*Answer:* 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 010-F013).

*Question 4:* If a case is included in the application processing timeliness measure (Item 010-F013), can it also be included in the recertification timeliness measure (Item 010-F018)?

*Answer:* Yes, some cases will be included in both the application processing (Item 010-F013) and the recertification timeliness (Item 010-F018) 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.

## ATTACHMENT A

### Q & A on Recertification Timeliness Measure from Administrative Notice 13-05

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

*Answer:* 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 010-F013) and coded as "40" under the recertification timeliness measure (Item 010-F018).

### 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:* 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:* 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:* QC reviewers should look at the sample month and the 12 months prior to the sample month to determine if a household received benefits after the last month of 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.

## ATTACHMENT A

### Q & A on Recertification Timeliness Measure from Administrative Notice 13-05

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

*Answer:* 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:* 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 did not miss a scheduled interview; he rescheduled it with the agency.

*Answer:* 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:* 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:* 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.

## ATTACHMENT A

### Q & A on Recertification Timeliness Measure from Administrative Notice 13-05

*Question 14:* 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:* 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 15:* 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:* 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.

# ATTACHMENT B

## RECERTIFICATION TIMELINESS CODING DOCUMENTATION TOOL RADEP ITEM 010-F018 (FNS ITEM 70)

<b>1</b>	<b>Benefits outside certification period:</b> Prior to recertification but after end of certification? If yes, then recertification process was outside the certification period, code item 010-F018 = 30	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>
<b>2</b>	<b>Date of Notice of Expiration (NEC) sent:</b>	
<b>3</b>	<b>Date of Recertification application:</b>	
<b>4</b>	<b>Interview required?</b>  If yes, date of Recertification Interview:	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>
<b>5</b>	<b>Further verification requested?</b>  Date Requested: Date required to be supplied: Date requested verification supplied by HH to agency:	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>
<b>6</b>	<b>Date of normal issuance</b>	
<b>7</b>	<b>Benefits available date:</b>	
<b>8</b>	<b>Benefits issued timely?</b>	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>
<b>Coding key:</b> 01- timely		
<b>Agency Caused, Not Timely</b> 11 – Agency failed to contact or did not contact client timely. This would include situations in which the agency failed to contact or did not contact client timely with Notice of Expiration (NOE), with recertification packet, to schedule interview, or to request verification. 12 – Agency lost or misfiled the verification or application for recertification. This would include any lost or misfiled application completed or otherwise. 13 – Agency failed to act on completed recertification application. This would include any completed recertification application that a caseworker failed to act on for whatever reason.		
<b>Client Caused, Not Timely</b> 24 – Client did not file the recertification application by the 15 <sup>th</sup> of the last month of the certification period 25 – Client missed the first scheduled interview 26 – Client did not return the required verification timely 27 – Other client caused delay.		
<b>No Recertification Action was Taken</b> 30 – Benefits issued outside the certification period. 40 – Not yet due for recertification. 50 – No recertification with the 12 months prior to the sample month.		
<b>Item 010-F018 code:</b>		
<b>Narrative:</b>		