

DSS ADMINISTRATIVE LETTER NO. ECONOMIC AND FAMILY SERVICES 1-2015
Food and Nutrition Services
(June 24, 2015)

(Food and Nutrition Services)

TO: County Directors of Social Services

ATTENTION: Food and Nutrition Services Managers and Supervisors

DATE: June 24, 2015

SUBJECT: FNS Application Processing Timeliness Standards

EFFECTIVE: Upon receipt

I. GENERAL INFORMATION

On May 21, 2015, the North Carolina Department of Health and Human Services received an Advanced Warning Letter from the United States Department of Agriculture (USDA) regarding North Carolina's failure to meet federal regulatory processing requirements for the Food and Nutrition Services Program. While the stated requirement for compliance providing households access to their FNS benefits within the 30 calendar day and 7 calendar day application processing standards has always been 100 percent, USDA considers 95 percent and above as an acceptable performance. Currently, NC is failing to meet these processing timeliness standards outlined by federal regulations and therefore, our State has been placed on corrective action by USDA.

The Food and Nutrition Services Certification Manual states that FNS benefits must be available to households within 30 calendar days or 7 calendar days if the household qualifies for expedited benefits. Based on discussions with County Directors, Administrators, Managers and Supervisors, it is apparent that staff have been under the understanding that if FNS applications are approved by the 30th or 7th day, the application is considered timely. This is inaccurate and does not meet the requirements as defined by federal regulations.

In order to comply with USDA requirements for the Food and Nutrition Services Program, North Carolina must achieve the processing timeliness requirements as set forth below:

- 85 percent average statewide timeliness for the 6 month period July 2015 through December 2015; and,
- 95 percent average statewide timeliness for the 6 month period January 2016 through June 2016.

The timeliness measures referenced above are based on Quality Control (QC) data, rather than actual cases processed as included on state reports. QC cases are

randomly selected from a statewide monthly sample of FNS cases that are reviewed by State QC Staff. QC reports the processing timeliness information on applications in the current federal fiscal year.

The purpose of this letter is to provide better understanding of the federal requirements related to processing timeliness as well as to provide updated policy and best practices related to timely processing of FNS benefits to households.

The Department recognizes the added challenges over the past several years such as increased caseload growth, Turbo Tax Applications, implementation of the Affordable Care Act and the implementation of a new case management system. County Departments of Social Services have taken unprecedented steps to eliminate the backlogs and deliver benefits to eligible recipients. Nevertheless, the processing timeliness issue must be addressed and corrected immediately. The State and counties must ensure families needing our services are provided benefits in a timely manner.

II. POLICY PROCEDURES

A. Application Approval Requirements

All eligible FNS applicants must have the opportunity to purchase food no later than the 7th or the 30th calendar day following the date of application. The day following the date of application is considered the first day of the 30 or 7 day timeframe. FNS applications and reapplications must be approved no later than the **4th calendar day** for expedited services or the **25th calendar day** for normal processing following the date the signed application is received. When the 4th or 25th day falls on a holiday or weekend, the application **must** be approved on the prior business day.

B. Denials

All FNS applicants must be given the full 30 days to participate in an interview and provide all required verifications. Deny the FNS application **no earlier** than the 30th day following the date of application if the FNS unit fails to provide the required verifications or fails to complete an interview. When the 30th calendar day falls on a holiday or weekend, the application must be denied on the **following** business day.

III. NC FAST AND CLIENT SERVICES DATA WAREHOUSE(CSDW) REPORTS

The daily NFOMD004-FNS/SNAP Pending Applications by County provided by NC FAST and the Application Processing Statics provided by CSDW will be modified to include applications subject to 25-day processing for normal application processing and applications subject to 4-day processing for expedited processing.

The daily NFOMD004A-FNS/SNAP Pending Apps Detail report provided by NC FAST and the Pending Applications and Emergency Cases report provided by CSDW will be modified to include a new column with a Due Date and a new column called FTP/Int

Denial Date. This represents the denial date if the application must be denied for failure to provide required verifications or failure to complete an interview.

The Application Processing Statics Reports provided by CSDW will be modified to include Regulatory Delay. NC FAST will not capture regulatory delay information on any reports. These reports will be modified by July 11, 2015.

IV. RECOMMENDATIONS AND REQUIREMENTS

In order to meet the application processing timeframes described in this letter, the following recommended/required best practices should be followed; this is not an all-inclusive list:

1. Applications received via ePASS, mail, fax or hand delivered must be assigned to workers immediately upon receipt to be screened for expedited benefits and completion of an interview. If a telephone interview cannot be conducted on the date of application, the household must be provided a DSS-8650 with a specific date and time for an interview. The household must be given an appointment allowing sufficient time for expedited screening.
2. The only required verification needed for expedited benefits is identification of the person making the application (this does not have to be a picture ID).
3. Conduct interviews on the same day the application is filed either in person or by telephone.
4. Explore all systems available that may verify eligibility requirements prior to requesting verification from the household.
5. Do not request unnecessary information from the household.
6. Do not request other information on the DSS-8650 (i.e. wages, rent receipts, etc.) prior to conducting the interview.
7. Process applications on the same day of the application interview when possible.
8. If the household has a current EBT card, do not issue a new card unless the card is damaged.
9. If the household fails to complete the interview by the 7th day and the interview was scheduled within the expedited period, the household is no longer eligible for expedited benefits. If the application is not eligible for expedited service the expedited indicator should be changed within the seven day timeframe.
10. When entering information from the DSS-8207 into NC FAST, all reported information should be entered so the system can determine if the application is an expedite or normal application. This will prevent applications from showing an inaccurate status on the report.

V. IMPLEMENTATION INSTRUCTIONS

This change is effective with all new and pending FNS applications upon receipt. Submit any questions regarding this policy to the DHHS Operational Support Team (OST) at ost.policy.questions@dhhs.nc.gov.

Sincerely,

A handwritten signature in black ink that reads "David Locklear". The signature is written in a cursive style with a large initial "D".

David Locklear, Chief
Economic and Family Services Section

DL/vd