
FOOD AND NUTRITION SERVICES CERTIFICATION
APPLICATIONS
FNS 425 EXPEDITED SERVICE PROCESSING

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Change #09-2021
August 9, 2021

425.01 EXPEDITED SERVICE APPLICATION TIME FRAME

If eligible for expedited service, the initial application or reapplication must be processed (approved) so the household has access to a valid EBT card **and** their FNS benefits that provide them the opportunity to purchase food no later than the seventh calendar day following the date of application.

This includes initial applications and reapplications. Both are treated the same throughout FNS policy, unless otherwise noted.

- Applications: A FNS household that has never received FNS in North Carolina before is referred to as an application.
- Reapplication: A FNS household that has previously received FNS in North Carolina and is applying for assistance again is referred to as a reapplication.

425.02 EXPEDITED SERVICE APPLICATION PROCESSING REQUIREMENTS

- A. All FNS applications and reapplications eligible for expedited service must be processed to allow the applicant to have a valid EBT card **and** access to FNS benefits that provide them the opportunity to purchase food **no later than the seventh day** from the date of application.
- B. It is recommended to process all expedited service applications the same day the interview is completed, but no later than the time frame listed in 425.02 A.
- C. The first calendar day is the day following the date of application as defined in FNS 410.03 Determining Date of Application.
- D. A household **must** be eligible for expedited service in the first eligible month of its certification period. This includes a month in which the benefits are prorated to zero. If a household is eligible for FNS benefits but not entitled to expedited service in the month it applies, certify the household using normal application processing found in FNS 420 Normal Application Processing.

Example: The household applies for benefits on January the 10th and has income in January. The income terminates in January and the household will have zero income February ongoing. Using January income, the household is not eligible for expedited services in the month of application. The caseworker processes the application, and the household is eligible for \$155 for January and \$204 for February ongoing. The month of January is prorated to zero. Even though the household will not receive a payment for

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the month of January, it is considered as expedited services and the household is not eligible for expedited service for the month of February.

- E. A resident of a public institution who applies for benefits prior to his/her release and is entitled to expedited service shall have his application processed with the release date as the date of application. A public institution includes, but is not limited to, a hospital, mental institute, jail, prison, etc.
- F. If a household is not eligible for FNS benefits for the month of application but is eligible for FNS benefits and qualifies for expedited benefits for the following month, the agency shall do the following.
 - 1. If the application is processed in North Carolina Families Accessing Services through Technology (NC FAST), authorize the case to allow access to benefits within seven days; do not hold the application until the 1st of the next month.
 - 2. The NC FAST system will deny benefits for the month of application and issue benefits for the next month based on the information entered into the system.
 - a. Benefits will be made available by NC FAST on the first working day of the second month or the day after processing, whichever is later for applications made between the 1st and 15th.
 - b. Benefits will be made available on the day after processing for applications made after the 15th of the month. The household will be issued only one month's benefits with expedited service regardless of the date of application.

EXAMPLE 1: A household applies for FNS benefits on January 8. The household is over gross income for the month of January; therefore, they are ineligible for FNS benefits in the month of application. The prescreening process determines that the household is entitled to expedited service for the following month. The application is taken and processed January 9, which is within seven days. NC FAST will make benefits available on February 1. If the application had been made on January 31 and processed February 1 the benefits would be available on February 2.

EXAMPLE 2: A household applies for FNS benefits on January 20. The household received FNS benefits in another state for the month of January; therefore, they are

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ineligible for FNS benefits in North Carolina until February. The prescreening process determines that the household is entitled to expedited service for the following month. The application is taken and processed January 25, which is within seven days. NC FAST will make benefits available on January 26. If the application had been made on January 31 and processed February 1 the benefits would be available on February 2.

425.03 CHANGES IN EXPEDITED STATUS

The agency is not required to re-screen pending applications every time a change is reported. However, if the agency discovers that a household is entitled to expedited service as the result of a change, the agency must:

- A. Provide expedited service to the household within the expedited processing standards.
- B. Calculate the seven-day expedited processing standard beginning the day after the agency discovers the household is entitled to expedited service.
- C. If a household loses its entitlement to expedited service between the date of application and the date of processing, the agency must process the case using normal application processing procedures.

425.04 EXPEDITED SERVICE BENEFITS ISSUANCE

- A. NC FAST determines eligibility for expedited benefits and issues benefits based on policy rules and information entered into the system.
- B. Households that apply between the 1st and 15th of the month will receive FNS benefits with expedited service, if otherwise eligible, for the month of application.
- C. Households that apply after the 15th of the month, if determined eligible, will receive a combined allotment of FNS benefits with expedited service for the month of application and the following month.

425.05 PROCESSING PROCEDURES FOR EXPEDITED SERVICE CASES

- A. Identity:
 - 1. The only eligibility factor that **must** be verified to approve expedited FNS benefits is identity. The identity of the applicant must be verified **prior** to approving FNS with expedited service.

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- a. If an authorized representative (AR) applies on behalf of the household, the identity of the AR and the head of household **must** be verified.
 - b. A collateral contact or readily available documentary evidence may be used to verify identity. Do not require a specific document, use any information that reasonably verifies the individual's identity.
 - c. If the applicant's identity cannot be verified within the expedited service time frame, the household **is not** entitled to expedited service.
2. The agency should continue to assist the household in obtaining the necessary verifications so the household's application may be processed as soon as possible within the normal processing standards.

B. Otherwise Eligible:

Before a household is approved for expedited service, the household **must** meet other eligibility factors that are known to the agency.

EXAMPLE: A single household individual, previously disqualified for failure to comply with a drug felon assessment, reapplies and states he will cure the disqualification. The applicant is ineligible for expedited services because he is presenting himself as ineligible for FNS benefits on the date of application. Benefits cannot be received until the disqualification is cured. Process using normal application timeframes.

C. Verifications:

1. All reasonable efforts must be made within the expedited service time frame to obtain all verification that is required under the normal processing procedures.
2. The household must provide sufficient information to determine eligibility prior to approval.
3. The agency must obtain as much verification as possible during the interview.
4. The eligibility requirements in this section may be verified using collateral contacts or readily available documentary evidence. Do not delay certification until the seventh day when it is unlikely that other verifications will be obtained by then.

Verification is required for the following eligibility factors but **may be postponed**. See FNS 425.06 Postponed Verification.

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- a. Income - In the case of no income, accept the applicant's statement that the household has no income;
- b. Resources;
- c. Liquid Resources - Consider the total amounts of the following to determine liquid resources.
 - i. Cash on hand;
 - ii. Checking accounts;
 - iii. Savings accounts;
 - iv. Savings certificates;
- d. Non-recurring lump-sum payments which include, but are not limited to, the following:
 - i. Income tax refunds;
 - ii. Rebates or credits;
 - iii. Retroactive lump-sum Social Security, SSI, Public Assistance, Railroad Retirement benefits, or other payments;
 - iv. Lump-sum insurance settlements; **and**
 - v. Refunds of security deposits on rental property or utilities;
- e. Residency – Verify except in unusual cases where verification cannot be easily obtained such as homeless households, newly-arrived households, and some migrant farmworker households;

NOTE: Verification must be pursued unless the household indicates that verification cannot be obtained. If it is determined that verification cannot be obtained, accept the client's statement for residency and document why the verification was not obtainable.
- f. The agency should use the appropriate utility standard (SUA, TUA or BUA) for the initial month if the household is entitled to it;
- g. Medical expenses for the elderly and disabled;
- h. Disability, if claimed;

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- i. Enumeration - Verify by submitting the number to the Social Security Administration (SSA) or request proof of application for a SSN prior to the second issuance;
- j. Citizenship and alien status; and
- k. All other questionable information.

D. Work Registration Requirements

The applicant or the household's authorized representative may complete work registration forms to the best of their ability for those household members required to register for work. The agency may attempt to register household members by other means, such as calling the household. Registration of household members and verification of questionable work exemptions must be postponed. Work registration will be deferred until postponed verification is provided. Once postponed verification is provided, FNS unit members must be registered unless exempt.

E. Able-Bodied Adults Without Dependents (ABAWD) Requirements

Prior to certification, the agency must evaluate all household members to determine ABAWD status.

F. Social Security Number Requirements

1. Ask households entitled to expedited service to furnish or apply for a social security number (SSN) for each person prior to releasing ongoing benefits.
2. For newborns, the household must provide a SSN or proof of an application for a SSN at its next recertification or within six months after the month the baby is born, whichever is later.
3. Those household members who do not meet this requirement will be allowed to participate if they satisfy the good cause requirements. See FNS 230 Social Security Enumeration, for explanation of good cause.

G. Alien Status Requirements

If a household that is eligible for expedited service submits information that indicates a non-citizen is eligible but does not provide the necessary verification, postpone verification and include the non-citizen as a member of the household. If the household does not provide enough information to determine that the alien is eligible, treat as an ineligible alien.

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H. Intentional Program Violation (IPV) Disqualified Individuals

If the household advises that a person has been disqualified for an IPV, the agency should act on the information provided by the household. If the agency discovers through automated inquiry and match procedures that a member is subject to disqualification for an IPV, the agency should determine if the disqualification is current and valid. Do not delay benefits beyond the seven-day delivery standard pending verification of the disqualification. The change cannot be made until the information is verified. Upon verification of the disqualification information, the agency must establish a claim against the household for any overissued benefits.

I. Eligibility and Benefit Calculations

Except for destitute migrant and seasonal farmworker households, expedited service households must meet the regular eligibility requirements other than the work registration, ABAWD, SSN, and the non-citizen status requirements listed above. The allotments must be calculated using the same procedures that are used for other households.

For destitute migrant and seasonal farmworker households, the agency must determine their eligibility to participate and their benefit level for the month of application by counting only income that was received between the first day of the month and the date of application. Any income from a new source that is anticipated after the day of initial application is disregarded for the month of application.

425.06 POSTPONED VERIFICATION

- A. The agency may postpone the verification of all eligibility factors **except** identity.
- B. Postponing the verification of these eligibility factors means that the household that applies between the 1st and 15th of the month will receive FNS benefits with expedited service, if otherwise eligible, for one month.
- C. Households that apply after the 15th of the month, if otherwise eligible, will receive a combined allotment of FNS benefits with expedited service for the month of application and the following month.
- D. Households will not receive any additional FNS benefits until the necessary verifications are provided. This applies even if the first month's benefits prorate to zero.
- E. Once postponed verification is received, process the case within 5 calendar days.

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- F. The postponed verification requirement applies to information known or anticipated at the time of the interview only. Use the DSS-8650 Notice of Information Needed to Complete Your Food and Nutrition Services (DSS-8650) to request verification of this information from the household.

EXAMPLE: If the household reported during the interview that it was going to start work the next day, the agency could postpone verification of the income the household is expected to receive from the new job, process the case, and act on the verified information when it is received without a DSS-8553 Notice of Adverse Action.

- G. The household has until the last workday of the month following the month of application to provide the necessary verifications.

1. If the household fails to provide postponed verification by the end of the second month, terminate the case.
2. The household is not eligible to receive expedited service again until postponed verification is provided.
3. If the household reapplies and has not provided previous postponed verification, process the application following normal processing standards.

- H. Do not reopen the application when the household provides the postponed verification after the second benefit month. The household **must** reapply.

- I. Unless the household misrepresented the information documented on the application or in the case file, there is no overissuance. This applies even if income and resources in the month of application are later verified to have exceeded the expedited service limits, eligibility limits, or provided a lower allotment. Consider the determination of eligibility correct if:

1. The decision to provide expedited service is correct based on the information provided on the application; and
2. The agency verified the identity of the head of household and, if applicable, the authorized representative.

425.07 PROCESSING REQUIREMENTS FOR CHANGES DURING THE POSTPONED VERIFICATION PERIOD

- A. If a reportable change requiring action occurs while waiting for postponed verifications to be received, determine if the change will increase or decrease the allotment.

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1. If the change will result in an increase in the allotment, issue a DSS-8650 to request necessary verification. Allow the household ten calendar days to provide the requested information. If verification is not provided do not terminate or increase the benefits.
 2. If the change will result in a decrease in the allotment or termination of benefits, make the change based on the client's statement. Verify the information prior to the next recertification. A DSS-8650 is not necessary.
- B. Verification of the change does not become part of the original postponed verification. Refer to FNS 515 Simplified Reporting Changes During the Certification Period for reacting to changes in situation. Process the application within the required time frames based on the original household situation. Do not delay processing due to the new change. Use the DSS-8650 to request additional information if needed. The FNS Unit has ten days to provide the information.
- C. If the change affects eligibility, complete and send the household the DSS-8551 Effect of Change Notice or the DSS-8553 Notice of Adverse Action, whichever is appropriate.

425.08 CERTIFICATION PERIODS FOR EXPEDITED SERVICE CASES

- A. The household will be assigned a normal certification period per FNS 500.02 Certification Periods.
1. For applications made after the 15th of the month, a combined allotment with expedited service for the month of application and the month after will be issued. Benefits for the third month will be issued following the normal issuance schedule.
 2. For applications made between the 1st and 15th of the month, the household will only receive the initial allotment. The second month's allotment will not be authorized until all postponed verifications are provided. This rule applies even if the initial month's benefits prorate to zero.
 3. For applications made after the 15th of the month, if determined eligible, the household will be issued a combined allotment with expedited service for the month of application and the month after. The third month's allotment will not be authorized until all postponed verifications are provided.
 4. If a household is not eligible for FNS benefits for the month of application but is eligible for FNS benefits and qualifies for expedited service for the

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following month, NC FAST will deny benefits for the month of application and issue benefits with expedited service for the following one month only.

425.9 REGULATORY DELAY FOR EXPEDITED SERVICE APPLICATIONS

Some expedited service cases may experience processing delays. NC FAST will offer the option to indicate a regulatory delay and the reason when appropriate. Delays with good cause are considered overdue by USDA. However, when appropriate, use regulatory delay to notate the reason for delay in NC FAST.

- A. The following situations are considered delays with good cause.
1. An applicant household was not eligible for expedited service at the time the application was taken. A change in situation occurs during the 30-day application processing period that makes the household eligible for expedited service.
 2. During the screening process, an applicant is not eligible for expedited service. However, when the income, liquid resources, or shelter expenses are verified, the household meets the criteria for expedited service processing.
 3. An applicant household is not eligible for FNS in the month of application but is eligible the following month and meets the criteria for expedited service.
 4. Other situations for good cause may be evaluated on a case-by-case basis. These situations should be discussed with your FNS state representative prior to making the determination.
- B. The following situations are not considered delays with good cause.
1. An applicant is eligible for expedited service at the time the application is screened; however, the applicant fails to provide verification of identity within seven calendar days as required. If the applicant fails to provide verification of identity within the seven calendar days, the household **loses** its entitlement to expedited service and becomes subject to all normal processing requirements.
 2. An applicant appears eligible for expedited service at the time the application is screened; however, the applicant cannot provide information about the household's income or reserve. This may happen when the applicant is not fully knowledgeable about the income or resources of other household members. If the information is not provided within seven calendar days, the household **loses** its entitlement to expedited service and becomes subject to all normal processing requirements.

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3. An application eligible for expedited service is not processed timely due to caseworker error.

425.10 EXPEDITED SERVICE SCREENER'S GUIDE

Expedited service is a way of delivering FNS benefits with expedited service to those households that are eligible for the service. The following households are entitled to expedited service when all eligibility criteria are met:

- A. Households with less than \$150 in monthly gross income and the household's liquid resources (i.e., cash on hand, checking or savings accounts, savings certificates, and lump-sum payments) do not exceed \$100 in total value.
- B. Households with combined monthly gross income and liquid resources less than the household's rent or mortgage and utilities. This includes the entitlement to the standard utility allowance (SUA), if appropriate.
- C. Destitute households with one or more members who are migrant or seasonal farmworkers and liquid resources do not exceed \$100 in total value. A migrant is an individual who travels away from home on a regular basis, usually with a group of laborers to seek employment in an agriculturally related activity. A seasonal farmworker is a person who is employed in agricultural employment of a seasonal or other temporary nature and is not required to be absent overnight from his permanent place of residence when:
 1. Employed on a farm or ranch performing field work related to planting, cultivating, **or**
 2. Employed in canning, packing, ginning, seed conditioning or related research, or processing operations, and transported, or caused to be transported, to or from the place of employment by means of a day-haul operation.

NOTE: A household that contains at least one individual engaged in seasonal farm work during the certification period is considered a seasonal farmworker household regardless of the amount of income it may get from that source. All members do not have to be engaged in farm work.

3. Only migrant or seasonal farmworker households are classified as destitute. No other households may qualify as a destitute household. A migrant or seasonal farmworker household is destitute when:
 - a. The household's only income for the month of application is received prior to the date of application and is from a terminated source.

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- i. The source is considered terminated if the income is received on a monthly or more frequent basis, and the income will not be received again from the same source during the month of application or the following month.
- ii. If the income is received less often than monthly, it will be considered terminated if receipt of the next scheduled payment cannot be anticipated.
- b. The household's only income for the month of application is from a new source, and income of more than \$25 from the new source will not be received by the tenth calendar day after the date of application.
 - i. Income will be considered from a new source if the income is normally received on a monthly or more frequent basis, **and** income of more than \$25 has not been received from that source within 30 days prior to the date of application.
 - ii. If the income is normally received less often than monthly, the income is considered from a new source of income of more than \$25 was not received at the last scheduled payment date or during the interval prior to the next scheduled payment date.
- c. Households may receive both income from a terminated source prior to the date of application and income from a new source after the date of application and still be considered destitute. This is possible if:
 - i. The household receives no other income in the month of application, **and**
 - ii. Income of more than \$25 from the new source will not be received by the tenth calendar day after the date of application.

Some employers provide migrants and seasonal farmworkers with payments to cover travel costs of new employees who must journey to the location of their new employment. To the extent that these payments are excluded as reimbursements, receipt of travel advances does not affect the determination of whether a household is destitute. However, if the travel advance is by written contract (an advance of wages that will be subtracted from wages later earned by the employee rather than a reimbursement), the wage advance is counted as income. The receipt of a wage advance for travel costs is not considered a new source of income. The amount of the wage advance to cover travel costs does not prohibit the FNS unit from being considered destitute.

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NOTE: Consider a migrant farmworker's source of income to be the grower for whom the migrant is working at a particular point in time and not the crew chief. Consider a migrant who travels with the same crew chief but moves from one grower to another to have moved from a terminated income source to a new source.

425.11 EXPEDITED SERVICE APPLICATION TIMELINESS MEASURE

- A. Compliance with expedited service application processing requirements is not measured by the date the FNS application is disposed. USDA requires that compliance with expedited service is measured from the date the FNS household has both a valid EBT card **and** access to the FNS benefits. This is known as the Benefit Availability Date (BAVDT). To be considered timely the BAVDT must be equal to or less than seven (7) days from the date of application.
- B. If the FNS unit has a valid EBT card when approved, you must add one processing day to the date the application is processed to determine the Bavdt.
- C. If the FNS unit is issued a new EBT card when approved, you must allow one processing day plus two days for receipt of the EBT card to the date the application is processed to determine the Bavdt.
- D. Definitions and formulas used to calculate normal application timeliness:
1. Application Date (AD) is the date a filed application is received.
 2. Disposition Date (DD) is the date the worker keys the approval in NC FAST.
 3. Benefit availability date (BAVDT)
 - a. If a new EBT card is issued
$$\text{BAVDT} = \text{DD} + 1 \text{ processing day} + 2 \text{ days for receipt of the EBT card}$$
 - b. If no new EBT card is issued
$$\text{BAVDT} = \text{DD} = 1 \text{ processing day}$$
 4. Processing Time (PT) is the number of days between the Application date and the BAVDT.
 - a. $\text{PT} = \text{Bavdt} - \text{AD}$
- E. To be considered timely the Processing Time must be **equal to or less** than seven days.

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Examples from the FNS Application Timeliness Report:

TIMELINESS	Application date	Progapp Disposeddate	Expedite Indicator	Disposition	Bavdt	Process Time	Cardissue	Certification startdate
Timely	06/14/2021	06/14/2021	Expedited	Approved	06/15/2021	1	N	06/14/2021
Timely	06/14/2021	06/14/2021	Expedited	Approved	06/15/2021	1	N	06/14/2021
Timely	06/11/2021	06/14/2021	Expedited	Approved	06/14/2021	3	N	07/01/2021
Timely	06/14/2021	06/14/2021	Expedited	Approved	06/17/2021	3	Y	06/14/2021
Timely	06/11/2021	06/14/2021	Expedited	Approved	06/17/2021	6	Y	06/11/2021
Timely	06/10/2021	06/14/2021	Expedited	Approved	06/17/2021	7	Y	06/10/2021
Untimely	06/09/2021	06/14/2021	Expedited	Approved	06/17/2021	8	Y	06/09/2021
Untimely	06/08/2021	06/14/2021	Expedited	Approved	06/17/2021	9	Y	06/08/2021
Untimely	06/04/2021	06/15/2021	Expedited	Approved	06/16/2021	12	N	06/04/2021
Untimely	06/02/2021	06/14/2021	Expedited	Approved	06/15/2021	13	N	06/02/2021
Untimely	06/01/2021	06/14/2021	Expedited	Approved	06/15/2021	14	N	06/01/2021

- F. Per USDA directive any application that the processing time is greater than seven days is considered an overdue application. This includes worker error and client delay, including applications that are processed using regulatory delay.

Processing Deadline Examples:

1. Date of application is June 11th. The FNS household has never received FNS before and does not have an EBT card. Allow one day for processing plus two days for receipt of the EBT card. The processing deadline is June 14th to be considered timely processing.

Sun	Mon	Tue	Wed	Thu	Fri	Sat
9	10	11 DOA	12	13	14 Process Deadline	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29

2. Date of application is June 11th. The FNS household previously received FNS and retained their EBT card and it is valid. The processing deadline is June 17th.

Sun	Mon	Tue	Wed	Thu	Fri	Sat
7	8	9	10	11 DOA	12	13
14	15	16	17 Process Deadline	18	19	20
15	16	17	18	19	20	21

3. Date of application is December 22nd. The FNS household previously received FNS but has lost or damaged their EBT card. Allow one

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processing day plus two days for receipt of the replacement EBT card.
The processing deadline is December 23rd.

Sun	Mon	Tue	Wed	Thu	Fri	Sat
20	21	22 DOA	23 Process Deadline	24 Holiday	25 Holiday	26
27	28	29	30	31		