



Family Assistance Letter # 144A
OFFICE OF FAMILY ASSISTANCE
April 17, 2015

TO: Directors, County Departments of Job and Family Services

FROM: Kara B. Wentz, Deputy Director, Office of Family Assistance

SUBJECT: **Application Processing Timeliness Rates for Food Assistance - UPDATE**

Family Assistance Letter (FAL) #144 explained that the Ohio Department of Job and Family Services (ODJFS) received an early warning notice from the Food and Nutrition Service (FNS) regarding the State's Food Assistance application processing timeliness (APT) rate and that as a result, ODJFS was required to modify its corrective action plan. FNS has given the State until July 31, 2015, to achieve a statewide APT rate of 90%.

As a result of this early warning letter FNS has required ODJFS to set forth benchmarks for county agencies to meet to ensure we meet the 90% goal. In addition, they have set forth criteria for the data we provide to monitor progress. The changes to the monthly application timeliness report; how ODJFS will determine if a county has met the benchmarks; what technical assistance will be provided to counties that do not meet the monthly benchmarks; and what will be required as part of a county's corrective action plan is further detailed below:

1. What are the requirements for processing an application for the Supplemental Nutrition Assistance Program (SNAP)?

Every application received by a county agency must be acted upon (approved, pending, or denied) no later than 30 days following the date of receipt. Applications qualifying for expedited service must be processed no later than 7-days following the date of receipt.

2. What if the 30th day falls on a holiday or weekend?

When the 30th day falls on a holiday or weekend, the application must be acted upon by either the business day immediately before or immediately following the 30th day, depending on the action being taken.

- Approvals and pending applications: the action must be taken "no later" than the 30th day (i.e., the business day immediately *before* the 30th day);
- Denials: the guidance from FNS is that the action may be taken on the business day immediately *following* the 30th day.

3. How is an application pended past 30 days?

Federal regulations allow the approval of a Food Assistance application to occur after the 30th day when the delay in processing is caused by the county agency or pending verifications (see the FA Application Processing on Day 30 attachment for further details). When this occurs, the county agency must: send a notice of pending status (JFS 07401) on the 30th day or the business day prior; determine food assistance eligibility as soon as possible, but no later than the 60th day; if eligible the county must open food assistance from the date of application and issue a CRIS-E generated approval notice. If the pending notice is issued correctly, an approval at any time during the 60 day period is considered to be timely. The issuance of the JFS 07401 and the cause of the delay must be documented in the case record.

4. How can the new application timeliness report be pulled?

The monthly application timeliness report is located in the Office of Family Assistance-BIC Application Timeliness Cube (Monthly Application Timeliness BICCUB1007). Step-by-step instructions for viewing and saving the report are attached to this letter.

5. What has changed in the monthly application timeliness report?

As part of the monitoring process, FNS has required the State to change the monthly application timeliness report. Specifically, FNS required a change in the way that timeliness for expedited applications is calculated: The old report would code any expedited application approved within 30-days as being timely; FNS has required that only expedited processed within 7-days be marked as timely. FNS will rely upon the modified report (and not Quality Control data) as evidence of the State's progress in reaching and sustaining an acceptable APT rate.

As you know the impact of the change to the monthly application timeliness report is significant. The number of untimely expedited applications went from 546 statewide in February to 6,134 in March.

6. Why is FNS using the new application timeliness report to measure the APT rate?

Rather than rely on Quality Control (QC) data that lags significantly, FNS will measure the State's progress using more current and immediate data from the new application timeliness report. While the data will reflect immediate progress made in improving the State's APT rate, the data will necessarily reflect administrative errors that the State would have reviewed and updated if it was pulled in a Quality Control review. For example, if a staff person incorrectly codes a case as a 7-day expedited case the case will be reviewed under those standards. In addition, we continue to reiterate the data will not portray cases that have been pended appropriately with the use of the JFS 7401.

7. How will ODJFS determine if a county has met a monthly APT rate benchmark?

ODJFS will utilize the new application timeliness report to determine if a county has met the monthly APT rate benchmarks.

8. How are expedited applications impacting the APT rate?

Based on the March monthly application timeliness report, approved applications that were subject to the 30-day processing standard were processed timely 92% of the time. Whereas, expedited applications (which made up nearly half of all approvals in March), were processed timely only 65% of the time.

A review of untimely expedited approvals from 12 different counties uncovered that many applications coded as "expedited" and "untimely" were either not qualified for expedited service (and were actually processed timely) or were not true applications subject to a timely processing standard. The number of errors discovered in these 12 counties alone could have had a 2% positive impact on the overall rate and potentially an even greater impact on individual county rates. The four specific errors that were common among the expedited untimely approvals were:

1. Eligibility workers improperly entered less income than what was claimed by the household.
2. Improper dates of application were used to avoid fiating the denial of the first month of assistance due to a household applying for assistance in Ohio after receiving benefits in another state.
3. Untimely recertifications.
4. Reinstatements completed with a new application rather than properly using the reinstatement driver in CRISE.

Moving forward, the Office of Family Assistance (OFA) will continue to analyze the monthly application timeliness report and provide updates to counties about specific trends. Technical assistance will be provided as needed.

9. What happens if a county fails to meet a monthly APT rate benchmark?

OFA will contact the county agency Director of any county that fails to meet a monthly APT rate benchmark. The Director will be notified of the data in the new application timeliness report and will be asked to provide OFA with a corrective action plan (CAP) within fourteen days. Similar to what FNS required of the State, the county corrective action plan (CAP) will need to include:

- Updated initiatives designed to promptly and effectively improve APT rates in the county;
- Longer-term initiatives that will sustain an acceptable APT rate of 95 %;
- Identification of staff responsible for implementing and monitoring each initiative; and
- How the county will monitor and evaluate the effectiveness of its initiatives in reaching an acceptable APT rate.

In addition to the CAP, OFA will begin providing the Director (or a designee) with a weekly report of applications that will reach the 30th day during the reporting week. The Director (or designee) will be asked to ensure that each application on the report is acted upon timely.

If you have any questions regarding this letter please contact Denise Olson at (419)247-0472 or at Denise.Olson@jfs.ohio.gov

cc: Cynthia Dungey, Director
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What to do with FA Applications Pending on Day 30

OAC Rule 5101:4-5-07 (G) though (J)



If initial application is pending at 30 days because:



Then:

<p>1. The AG missed interview appointment, was sent a JFS 04218 Notice of Missed Interview (NOMI) and failed to request a rescheduled interview...</p>	<p>Deny the application. Can certify without a new application if AG takes required action within in 60 days from original application filing date. AG loses eligibility for initial month.</p>
<p>2. The AG completed the interview but failed to provide verification of an eligibility factor, such as income...</p>	<p>Deny the application. Can certify without a new application if AG takes required action within in 60 days from original application date. AG loses eligibility for initial month.</p>
<p>3. The AG completed the interview but failed to provide verification of one or more deductible expenses...</p>	<p>Authorize without allowing the unverified expense(s). If/when the verification is subsequently provided, process as a change.</p>
<p>4. AG missed its interview, was sent a NOMI, completed a rescheduled interview between day 21 and 30, but failed to provide requested verification of an eligibility factor, such as income, by day 30...</p>	<p>Deny the application. Can certify without a new application if AG takes required action within in 60 days from original application filing date. AG loses eligibility for initial month.</p>
<p>5. AG missed its interview, was sent a NOMI, completed a rescheduled interview between day 21 and 30, but failed to provide requested verification of one or more deductible expenses by day 30....</p>	<p>Authorize without allowing the unverified expense(s). If/when the verification is subsequently provided, process as a change.</p>
<p>6. AG missed its interview, was sent a NOMI and called prior to the 30th day requesting a rescheduled interview appointment beyond 30 days from the application filing date...</p>	<p>Deny the application. Can certify without a new application if AG takes required action within in 60 days from original application filing date. AG loses eligibility for initial month.</p>
<p>7. AG missed or rescheduled two or more interviews and called prior to the 30th day requesting another interview which can't be scheduled by the 30th day...</p>	<p>Deny the application. Can certify without a new application if AG takes required action within in 60 days from original application filing date. AG loses eligibility for initial month.</p>

If an application is denied on the 30th day and the AG is given an additional 30 days to complete the application process, no further action is required by the county agency if the AG fails to take the required action within 60 days from the application filing date. OAC Rule 5101:4-5-07 (H)(2)(a).

When to Issue a Pending Notice (JFS 07401)
If Unable to Approve or Deny Application by Day 30
 OAC Rule 5101:4-5-07 (G) though (J)

If initial application is pending at 30 days because:



Then:

<p>8. AG has cooperated and CDJFS is waiting for verification from employer or other third party...</p> <p>Reminder: We are not limited to any one form of verification. When possible, assist AG in obtaining verifications by 30th day, such as contacting 3rd party by phone. Can accept client statement if 3rd party verification is unavailable. OAC Rule 5101:4-2-09 (I).</p>	<p>Issue a pending notice and document this in CLRC.</p>
<p>9. Initial interview appointment was delayed beyond 30 days due to agency backlog...</p>	<p>Issue a pending notice and document this in CLRC. Let application continue to pend for up to an additional 30 days.</p>
<p>10. Initial interview appointment was delayed for several weeks due to agency backlog, there were fewer than 10 days left in the 30 day processing period when the interview was conducted, and requested verifications are not provided by the 30th day...</p>	<p>Issue a pending notice and document this in CLRC. Let application continue to pend for up to an additional 30 days.</p>
<p>11. AG missed interview appointment but was not sent a NOMI, and the AG did not call to reschedule an appointment by the 30th day...</p>	<p>Issue a pending notice and document this in CLRC. Let application continue to pend for up to an additional 30 days.</p>
<p>12. AG missed its interview appointment, was sent a NOMI and called on day 27 to reschedule, but CDJFS could not reschedule by the 30th day...</p>	<p>Issue a pending notice and document this in CLRC. Let application continue to pend for up to an additional 30 days.</p>
<p>13. There were fewer than 10 days left in the 30 day application processing period when the AG reported a change requiring additional verification...</p>	<p>Issue a pending notice and document this in CLRC. Let application continue to pend for up to an additional 30 days.</p>

*When a pending notice is issued, potential eligibility exists from the original application filing date.

Office of Family Assistance-BIC Application Timeliness Cube
Viewing Your Monthly Application Timeliness Information
(Source: *Monthly Application Timeliness BICCUB1007*)

1. From Public Folder click on [Office of Family Assistance: CRIS-E Link](#);
2. Then click on the link [Application Tracking Reports](#);
3. Next, click on the [Application Timeliness link](#);
4. Click on [Monthly Application Timeliness BICCUB1007](#)
5. From the Monthly Application Timeliness BICCUB1007 report page. Click on the “**Geography**” drop down arrow and select your county from the available options;
6. Next, click on the “**Program**” and select Food Stamp-FS item from the drop down options list;
7. Then bring mouse over the “**Month**” select the appropriate month or period from the drop down list;
8. Next, click [Application Status](#) and select ‘*Opened*’. This reflects your county’s current application timeliness.
9. To save the format of the report in the bottom right hand corner click the disc icon.
10. On the screen that appears you may type a new report name in the “Name” box. You also may type in a unique description of the report in the “Description” box.
11. Once you have named your report click on “Ok”. This cube view is now saved in the “My Folders” tab in BIC.
12. To reopen the cube you click on “My Folders”, find the correct cube and click on its title.