

# Supplemental Nutrition Assistance Program (SNAP) Timeliness Standards

**Policy 24.03**

**Effective: February 1, 2022**

## Introduction

TDHS employees shall follow instructional steps for processing Supplemental Nutrition Assistance Program (SNAP) applications by the fourth (4<sup>th</sup>), seventh (7<sup>th</sup>), fifteenth (15<sup>th</sup>), or thirtieth (30<sup>th</sup>) calendar day from the application date depending on whether the application is expedited or not.

## Scope

To provide standards for the delivery of service and/or notification of action taken on an application and to address certain situations, which may occur because of various applicant/participant, or county caused delays and the type of action that should be taken when this happens.

## Policy

### A. Processing Standards

1. The process of determining eligibility for SNAP shall proceed as promptly as possible after an application is filed.
2. The standard of promptness for determining eligibility for SNAP is seven (7) calendar days for expedited applications and thirty (30) calendar days for regular applications.
3. In the case of expedited applications, the county office will determine eligibility timely enough for the household to receive the benefits on or before the seventh (7<sup>th</sup>) calendar day following the application date.
4. If a household does not have an Electronic Benefit Card (EBT) then the application would need to be completed in time for a card to be issued prior to benefits being released.

5. In the case of expedited benefits that would mean that the application should be processed on or before the fourth (4<sup>th</sup>) calendar day to ensure that the card and benefits would be received by the seventh (7<sup>th</sup>) calendar day.
  - a. The household will lose its entitlement to expedited service when an applicant who has been prescreened as expedited fails to complete the interview process within four (4) calendar days of the application date. The household's application will be processed under the normal timeliness standards of thirty (30) calendar days.
  - b. Staff shall refer to [Expedited Households that Miss Their First Interview](#) on the procedures detailing how to treat households that are prescreened expedited, scheduled an appointment, and miss their first interview.
6. When the pre-screener (Refer to [Prescreening for Expedited Services](#)) fails to identify a household as eligible for expedited service, and the Eligibility Counselor subsequently discovers that the household is entitled to expedited service, the household must receive benefits on or before the seventh (7<sup>th</sup>) day following the date of discovery.

### B. Households Eligible for Expedited Services

1. Expedited procedures apply at initial application only for the first (1<sup>st</sup>) month of the certification period. Households that reapply for SNAP during the last month of their certification period for the following month are not entitled to expedited services at reapplication.

2. Households with less than one hundred and fifty dollars (\$150) in countable monthly gross income and whose total liquid resources do not exceed one hundred (\$100).
3. Eligible households, whose monthly shelter costs, together with its utilities, based upon actual costs or the standard utility allowances, exceed the combination of the household's liquid resources and its gross income for the month that is countable under SNAP rules.
4. Migrant or seasonal farmworker households may be entitled to expedited service and special income calculation procedures due to little or no income and may need immediate food assistance. Staff shall refer to [Policy 24.21 SNAP Destitute Households or Seasonal Farmworkers](#).

### C. Opportunity to Participate

1. An opportunity to participate in SNAP consists of providing households with an EBT card and having a PIN number available for the household to obtain its allotment.
2. The card and PIN should reach the participant so that the household will have an opportunity to participate within the appropriate timeframe based on the type of application. See the [Application Timeliness Tracking Guide](#) for more information.
3. If the case is a regular application and the individual does not have an EBT card, authorize SNAP by the twenty-seventh (27th) calendar day so benefits can be in hand by the thirtieth (30th) calendar day.
4. If the case is processed as an expedited case, authorize SNAP by the fourth (4th) calendar day so benefits can be in hand by the seventh (7th) calendar day.

### D. Normal Certification Periods

1. The process of determining eligibility for SNAP shall proceed as promptly as possible after an application is filed. The standard of promptness for determining eligibility for SNAP is thirty (30) calendar days for regular applications.
2. Non-expedited cases that are eligible for benefits and complete the required process should receive benefits by the thirtieth (30<sup>th</sup>) calendar day.

3. Assign normal certification period to households that have been interviewed and have provided all necessary verification required in [Policy 24.17 SNAP Mandatory Verifications](#) and the supporting document [Verification and Documentation for SNAP](#), prior to certification.
4. For applications filed after the fifteenth (15<sup>th</sup>) of the month, the case management system will assign at least a two (2)-month certification period.

### E. Action When SNAP Determination Precedes Families First Determination

1. As a result of differences in SNAP and Families First (FF) application processing procedures, the Eligibility Counselor may have to determine the SNAP eligibility prior to determining eligibility for FF payments.
2. Action on the SNAP portion of the application shall not be delayed, or the application denied on grounds that the FF determination has not been made.
3. If the Eligibility Counselor can anticipate the amount and the date of receipt of FF payment but the payment will not be received until a subsequent month, the Eligibility Counselor shall vary the household's SNAP benefit level according to the FF payment and notify the household.
4. Portions of initial payments intended to retroactively cover a previous month shall be disregarded as a lump sum payment.
5. If the amount or the month of receipt of the initial FF payment cannot be reasonably anticipated at the time of the SNAP eligibility determination, the payment shall be handled as a change in circumstances.
6. When the SNAP benefits are authorized, an approval notice will automatically be sent to inform the household.
7. A household whose FF application is denied shall not be required to file a new SNAP application but shall have their SNAP eligibility determined or continued on the basis of the original application filed jointly for FF and SNAP purposes and any other documented information obtained subsequent to the application which may have been used in the

FF determination and which is relevant to SNAP eligibility or level of benefits.

## F. Notices of Eligibility for Initial Applications

### 1. Time Limit for Providing Notice of Eligibility

The Eligibility Counselor will provide applicants with an approval or denial notice through the case management system as soon as possible once a determination is made.

### 2. Contents of Notice

- a. Approval notices are created and mailed the day following authorization.
- b. The notice will inform the household of the amount of the benefits and of the variation in the benefit level based on changes anticipated at the time of approval.
- c. If the initial allotment contains benefits for both the month of application and the current month's benefits, the notice shall explain that the initial benefits include more than one month's benefits.
- d. It also will indicate the monthly allotment amount for the remainder of the eligibility period assigned.
- e. The notice will inform the household of the beginning and ending date of the SNAP certification period.
- f. The notice will advise the household of its right to a fair hearing and of the name and telephone number of the person to contact for additional information, as well as the availability of free legal advice and how to obtain it. Staff should refer to the [SNAP Notice Language Desk Guide](#) for assistance in selecting the notice comments and appropriate reason code.

## G. Notice of Eligibility for Expedited Applications and Recertifications

### 1. Expedited Applications

- a. In cases where a household's application is approved on an expedited basis without verification, and the application indicates the household is eligible for prorated benefits the approval notice will explain that the household must meet verification

requirements that were postponed before further benefits will be issued.

- b. If the Eligibility Counselor assigns a longer certification period because approval was made after the fifteenth (15<sup>th</sup>) of the month to some households certified on an expedited basis, the notice also will explain the special conditions of the longer certification period and the consequences of failure to provide the postponed verification.

### 2. Recertification

- a. Households that have filed an application by the fifteenth (15<sup>th</sup>) of the last month of their certification period and who have kept their scheduled interview appointment on or after their application should be issued a notice regarding eligibility or ineligibility by the end of the current certification period if they are eligible.
- b. Households that have submitted an application, that miss their interview appointment, and have not rescheduled should be denied with reason code 495 on the last day of their certification month or at the time of missed interview. A denial for failure to provide verification cannot be authorized until the applicant has had at least ten (10) calendar days from the day following the mail date of the written request to provide.
- c. Applications filed after the fifteenth (15<sup>th</sup>) of the month are subject to initial application timeliness standards. The Eligibility Counselor will provide households that have received a notice of expiration at the time of certification and have timely reapplied with a notice of eligibility or a notice of denial not later than thirty (30) calendar days after the date the household received its last allotment.
- d. Quality Control Reviewers will cite review timeliness errors any time a customer completes an application by the last day of their review month and does not receive benefits, if eligible, by their normal issuance date the next month.

- e. In addition, federal regulations state notice of missed interview and denial both can be sent the day they miss the interview, the end of certification month, or by the thirtieth (30<sup>th</sup>) day.

## H. Denial Notices

### 1. Ineligible SNAP households

Each household denied eligibility shall be provided a notice of denial which explains:

- a. the basis for the denial, including specific rule number used as the basis of denial;
  - b. must explain the applicant's right to provide verification by the thirtieth (30<sup>th</sup>) day with benefits provided from the application date, if eligible;
  - c. the household's right to request a fair hearing;
  - d. the telephone number of the TDHS office;
  - e. the name of the person to contact for additional information;
  - f. the availability and telephone number of the organization in their area that provides free legal representation; and
  - g. the right to reapply anytime.
2. Applicant/Recipient (A/R) fails to keep an appointment
    - a. if an applicant has failed to appear for the initial interview, a "Notice of Missed Interview" (NOMI) will be sent by the Eligibility Counselor to notify the household that it missed the first appointment.
    - b. the notice also will inform the applicant that they must contact the county office and schedule a second appointment within the processing timeframe, or the application will be denied.
    - c. the application will be held pending for thirty (30) days.
    - d. if the applicant does not schedule a second interview appointment, or if the applicant fails to appear for this second appointment after requesting it, deny the SNAP application on the thirtieth (30<sup>th</sup>) day

or the next business day if the thirtieth (30<sup>th</sup>) day falls on a non-business day.

For additional information please see the [SNAP Application Processing Guide](#).

## I. Time Limit for Providing Notice of Denial

1. Households that are found to be ineligible shall be sent a notice of denial as soon as possible.
2. The action to deny should be taken by the thirtieth (30<sup>th</sup>) day whenever policy allows.
3. Information obtained and verified during the intake interview in some instances is sufficient for the intake Eligibility Counselor to determine that the applicant is ineligible at intake and, therefore, the application can be denied at that point.
4. A denial action for not completing an initial interview cannot be taken until the thirtieth (30<sup>th</sup>) day or next working day if the thirtieth (30<sup>th</sup>) day is a non-business day.
5. A denial action for failure to provide verification cannot be taken until after the applicant has had ten (10) days following the mail date of the written request to provide verifications. If the tenth (10<sup>th</sup>) day is a non-business day, give the client until the next working day to provide verifications.

## J. Failure to Meet Timeliness Standard

1. If the Eligibility Counselor cannot make an eligibility determination within the thirty (30) days and cannot deny the household, the cause of the delay is determined, and certain actions are taken to determine whether the delay was caused by the fault of the household or the county office.
2. The delay shall be considered the fault of the household if the household has failed to complete the application process when the Eligibility Counselor has taken all the action he or she is required to take to assist the household.
3. If the county office fails to assist the household, as required, in completing the application form or in obtaining documentary evidence to support its income or questionable information, fails to give the household sufficient time, or fails to timely

schedule the required interviews, the fault is then the county's.

4. If the county office fails to assist the household as required in obtaining verification of questionable expenses, do not delay processing the application. Certify the household without the expense and restore any lost benefits to the household upon receipt of the required information, if appropriate.
5. The Eligibility Counselor must have taken the action as previously outlined in this policy before a delay can be considered the fault of the household.
6. A delay shall be considered the fault of the county office if the Eligibility Counselor failed to take actions previously outlined in this policy.
7. The fault is the county office's if the household met its obligations in a timely manner, but the county office failed to complete the application process by the thirtieth (30<sup>th</sup>) day.
8. When the delay is the fault of the county, the household's benefit level for the initial month of certification is based on the day of the month it filed its application for benefits.

#### K. County Office Requirements

1. The Eligibility Counselor must offer, or attempt to offer, assistance in completion of the application for those households that have failed to complete the application form.
2. The Eligibility Counselor must have informed the household of the need to register for work, and given the household at least ten (10) calendar days from the date of notification to register a household member for work, if one or more members of the household have failed to register as required in [Policy 24.11 SNAP Work Requirements](#).
3. The Eligibility Counselor must have assisted the household when necessary for the household to provide documentary evidence to support its income statement and questionable information.
4. The Eligibility Counselor must have allowed the household sufficient time prior to the thirtieth (30<sup>th</sup>) day of the application to

provide the missing verification. Sufficient time is at least ten (10) days from the date of the county office's initial request for the particular verification that was missing.

5. The Eligibility Counselor will give the household a written list of the information needed and the due date to provide the missing information, both verbally and in writing.
6. The Eligibility Counselor is then responsible to ensure that:
  - a. documentation is placed in the running record to note any outstanding verification within forty-eight (48) hours,
  - b. a written request is provided to the applicant, and
  - c. assistance is offered in obtaining verification, if requested.
7. If the applicant has failed to provide the verification within ten (10) days of the Eligibility Counselor's request, the Eligibility Counselor must deny the application after the tenth (10<sup>th</sup>) day.
8. When an application is denied after the tenth (10<sup>th</sup>) day for "failure to provide verification" (reason code 305), and the household provides the missing verification within the initial thirty (30) day application processing period, the application must be reopened, and benefits prorated from the date of application.
9. If the household provides the missing verification in the second thirty (30) day period, the application must be reinstated and benefits will be provided from the date that the household furnished the verification, if eligible.
10. If the verification is provided within sixty (60) days from the application date, the Eligibility Counselor must act on the verification without requesting a new application.

#### L. Household (Applicant) Delays

1. The household loses its entitlement to benefits, if by the thirtieth (30<sup>th</sup>) day following the date of application; the Eligibility Counselor cannot take further action on the application due to the fault of the household.



2. If a notice of denial is sent and the household takes the required action within sixty (60) days of the date the application was filed, the Eligibility Counselor will reopen the case without requiring a new application.
3. The household is not entitled to benefits for the month of application when the delay was the fault of the household. The Eligibility Counselor will provide benefits prorated from the day of the month that the applicant/recipient took the action or provided the information required to complete the application process if, during the second thirty (30) day period, the household is found to be eligible.
4. If the household is at fault for not completing the application process by the end of the second thirty-day (30) period, the Eligibility Counselor shall require the household to file a new application if it wishes to participate.

**M. County Office Delays**

1. Whenever a delay in the initial thirty (30) day period is the fault of the county, the Eligibility Counselor will take immediate corrective action. A notice of denial cannot be sent for county-caused delays.
2. The Eligibility Counselor will not deny the application if the delay was caused by the county, but instead will notify the household by the thirtieth (30<sup>th</sup>) day after the application was filed that its application is being held pending. The Eligibility Counselor also will notify the household of any action it must take or outstanding verification that must be provided to complete the application process.
3. If the county caused the delay during the first thirty (30) days, and the household is found to be eligible during the second thirty (30) day period, the household shall be entitled to benefits retroactive to the day it filed its application for benefits. If, however, the household is found to be ineligible, the Eligibility Counselor shall deny the application.

4. If the county is at fault for not completing the application process by the end of the second thirty-day (30) period, and all the information necessary to complete the application has been received, the Eligibility Counselor must continue to process the original application until an eligibility determination is made. If the household is determined eligible and the county was at fault for the delay in the initial thirty (30) days, the household must receive its initial benefits retroactive to the day of the month it applied for benefits.
5. If the county is at fault for not completing the application process by the end of the second thirty (30) day period (60 days) but the case is not complete enough to reach an eligibility determination, the Eligibility Counselor should deny the case and notify the household to file a new application unless the original application can be processed immediately, and the household notified of the action that will be taken.

**Supporting Documents**

- [Expedited Households that Miss Their First Interview](#)
- [Prescreening for Expedited Services](#)
- [Policy 24.21 SNAP Destitute Households or Seasonal Farmworkers](#)
- [Application Timeliness Tracking Guide](#)
- [Policy 24.17 SNAP Mandatory Verifications](#)
- [Verification and Documentation for SNAP](#)
- [SNAP Notice Language Desk Guide](#)
- [SNAP Application Processing Guide](#)
- [Policy 24.11 SNAP Work Requirements](#)
- [Unearned Income Types](#)
- [Verification Codes](#)
- [Verifying Resources](#)
- [What You Should Ask About? Changes Guide](#)

**Definitions/Acronyms**

Term	Definition
<b>Applicant</b>	An applicant is a person who has submitted a completed and signed document prescribed by TDHS as a form approved by Food and Nutrition Service (FNS) containing at least a legible name, address, and a

	signature to request Supplemental Nutrition Assistance Program (SNAP) for the household of which he/she is a member.  An authorized representative or legal guardian may actually file the application provided they have been authorized to do so by the head of the household, spouse, or other responsible household member.
<b>Application or Application Form</b>	An application is a form prescribed by TDHS and/or approved by Food and Nutrition Service (FNS) containing prescribed information which is submitted to TDHS by a person requesting assistance, or by the person's legally appointed guardian, or authorized representative. For SNAP purposes, an initial application is the first month for which the household applies for participation, following any period during which the household was not certified for participation in SNAP.
<b>Certification Period</b>	A certification period is an assigned period of time during which a household is eligible and certified to receive SNAP benefits.
<b>Household</b>	A household is a social unit comprised of varying numbers of individuals who live together in the same dwelling. It is also the concept used to determine the food purchasing and preparation patterns of all individuals with common living quarters.  For SNAP purposes, a household is a group of people who customarily purchase and prepare food together for home consumption. For program purposes, an individual living alone may be a household.
<b>Income</b>	A recurring gain or benefit measured in money amounts.
<b>Resident</b>	A household living in the county in which it files an application for participation.
<b>A/R</b>	Applicant/Recipient
<b>EBT</b>	Electronic Benefit Transfer
<b>FNS</b>	Food and Nutrition Service, a division of the United States Department of Agriculture
<b>FF</b>	Families First
<b>NOMI</b>	Notice of Missed Interview
<b>QC</b>	Quality Control
<b>SNAP</b>	Supplemental Nutrition Assistance Program
<b>TDHS</b>	Tennessee Department of Human Services

## Supersedes

PUN 24.10-21.01 Ten (10) Day Time Frame for Pending Verifications and Customer Contact

Policy 24.03 SNAP Timeliness Standards eff. date 09/03/2018

## Approval History

Approved By	Approver Title	Approved Date	Effective Date
Clarence H. Carter	Commission	01/21/2022	02/01/2022
Danielle Anita Barnes	Commissioner	08/13/2018	09/03/2018
Danielle Anita Barnes	Commissioner	02/14/2018	02/15/2018

## Revision History

Date	Version	Location of Change	Description/Reason for Change
01/21/2022	02/01/2022	Section I. Time Limits	Change to 10-day count for verifications.
08/13/2018	09/03/2018	A.5.a; A.5.b; F.1; K.2	Added items in A.5, revised item in F, updated collateral document in K.
02/14/2018	02/15/2018	N/A	New Document

<b>Approved By</b>	<i>Clarence H. Carter</i>	<b>Approval Date</b>	01/21/2022
<b>Authority</b>	7 C.F.R. § 273.2; 7 C.F.R. § 273.10 Tenn. Code Ann. §§71-5-304 Tenn. Comp. R & Regs. 1240-1-17-.02--.09	<b>Effective Date</b>	02/01/2022
<b>Application</b>	All TDHS Employees and Contractors		