

SNAP RECERTIFICATION TOOLKIT

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SNAP Recertification Toolkit

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Introduction

For several years, the Food and Nutrition Service (FNS) has focused on the initial application process. This has led to improvements, particularly to initial application processing timeliness. While these areas remain priorities, State agencies have also raised concerns about the recertification process and FNS understands the need for clarity on this important issue.

Throughout fiscal year 2017, FNS reviewed Federal SNAP recertification statutory and regulatory requirements and policy guidance and conducted focused Local Program Access Reviews (LPARs) in every State to understand and document how each State agency has implemented the SNAP recertification requirements. These reviews allowed FNS to gain a more detailed understanding of the recertification process in each State as well as providing a broad perspective across States.

Through the reviews and internal workgroups, FNS identified a number of inconsistencies with Federal program requirements and implementation of these requirements across States. Some of the major trends are as follows:

- Recertification processes vary heavily from State to State and even from local office to local office. This variance stems predominantly from the flexibility within the regulations, chosen State options, and State agency use of modernization initiatives and technologies such as online recertification applications, document imaging, online document submission, and call centers. The variance in how recertification is implemented stands in contrast to the initial certification process, which has a fairly linear flow and defined timeline.
- The quality of recertification interviews vary. Some State agencies are not conducting recertification interviews at all or are conducting very short interviews. Some State agencies do not schedule an interview until a recertification application is received, others schedule the interview regardless, and others consider the interview as an ‘interactive application’ and do not have a separate recertification application.
- Requests for verifications at recertification vary heavily across States. Some State agencies request no verifications, while others require the maximum amount of verifications.
- There is confusion about the appropriate treatment and timeframe for processing recertification applications received after the 15th of the month, but prior to the expiration of the household’s certification period.
- State agencies also vary in their treatment of recertification applications received during the 30-day period beginning on the expiration of the household’s certification period. Some States process such applications as recertification applications, others as initial applications.
- Proration is often applied incorrectly or inconsistently. This may be related to the confusion State agencies have surrounding processing timeframes for recertification applications submitted after the 15th of the month or after the certification period expires.
- Many State agencies experience significant churn or “late” recertifications. For instance, many cases auto-close because the households failed to take any action to recertify, but

then reapply within 30 days of expiration. This can strain caseload management resources and cause lapses in household benefits.

This toolkit is intended to clarify the steps in the recertification process, identify areas of State flexibility, and help State agencies ensure all households in their SNAP caseload are treated consistently at the time of recertification.

What is Recertification?

Recertification is the process by which a State agency determines eligibility for active SNAP households prior to the end of households' current certification periods. The recertification process mirrors the certification process and shares a similar objective of eligibility determination and accurate allotment determinations for eligible households. The following high-level components make up the recertification process:

- notice of expiration;
- recertification application;
- interview;
- verification; and
- timely eligibility determination.

This toolkit is intended to clarify the SNAP recertification process, including by identifying ambiguous areas in the regulations and specified areas of State flexibility.

Statutory and Regulatory Basis

Section 11(e)(4) of the Food and Nutrition Act of 2008 ("the Act") requires that to continue receiving SNAP benefits each household must submit an application for recertification. The Act requires State agencies to provide each household with a notice of expiration of its certification prior to the start of the last month of the household's certification period. This notice must advise the household of its responsibilities, including the submission of a new application. The new application is the basis of the new certification period.

Section 273.14(a) of title 7, Code of Federal Regulations (CFR), states that no household may participate beyond the expiration of its assigned certification period without a determination of eligibility for a new period. Households must apply for recertification and comply with interview and verification requirements. 7 CFR 273.14 contains most of the SNAP regulatory requirements for recertification. This toolkit is intended to help State agencies correctly implement the regulations and is not a substitute for the regulations themselves.

Continued Benefits

FNS reminds State agencies that under no circumstances may a household continue to receive benefits beyond their current certification period without the State agency and the household completing all the recertification requirements and eligibility being recertified. State agencies must have procedures to ensure a household's benefits do not continue beyond the end of the certification period if an eligibility determination has not been made.

Example

A State agency has a backlog of actions to take on recertifications ending in the month of August. The State is unable to complete these actions by August 31 under their current process. The State agency authorizes overtime to address the backlog and process the actions by the end of August, ensuring that these households do not continue to receive benefits until the State agency is able to complete the recertification process.

Areas of Regulatory Ambiguity and State Flexibility

FNS acknowledges that the SNAP regulations contain areas of ambiguity as well as specified State flexibilities. As a result, the exact timeline and flow of recertification vary widely across States. To assist State agencies in navigating the ambiguous areas and exercising their flexibilities, this toolkit outlines what FNS considers reasonable interpretations of several regulatory provisions and provides best practice recommendations. FNS reminds State agencies that any approach chosen by the State should be applied consistently across the State's SNAP caseload.

Recertifications

Notice of Expiration

Regulations at 7 CFR 273.14(b)(1) require State agencies to send a notice of expiration (NOE) within a specified timeframe as follows:

- At the time of certification for households certified for one month or certified in the second month of a two-month certification period, or
- Between the first and last day of the month prior to the month the certification period ends for all other households.

Example

For households with a certification period greater than two months, if the certification period ends on August 31, the State agency must send the NOE between July 1 and July 31.

For jointly processed Public/General Assistance households, the NOE is not required if SNAP is recertified at the same time as the Public/General Assistance. Otherwise, the State must send the NOE in accordance with the appropriate timeframe specified above.

These regulations allow the option of including additional documents such as the recertification application, interview appointment letter, and statement of needed verification. While State agencies have flexibility, the NOE must meet the following requirements:

- Indicate the date the household's certification period expires.
- Provide the date by which the household must submit an application in order to receive uninterrupted benefits; this date must be 15 days prior to the last day of the household's current certification period.
- Describe the consequences for failure to apply for recertification in a timely manner.
- Provide notice of the right to receive an application upon request.
- Provide notice of the right to submit an application as long as it contains name, address, and signature.
- Describe alternative methods for households to submit the application.
- Provide the address of the office where an application can be filed.
- Provide notice of the right to request a fair hearing if the application is denied or if the household objects to benefit issuance.
- Provide notice of the right to apply for recertification at an office of the Social Security Administration if the household consists of only SSI members.
- Provide notice that failure to attend an interview may result in delay or denial of benefits.
- Indicate that the household is responsible for rescheduling a missed interview and for providing required verification.
- Meet bilingual requirements.

Best Practices

To expedite recertification, FNS encourages State agencies to send with the NOE a recertification application, an interview appointment letter that allows for either an in-person or a telephone interview, a Notice of Required Verification, and a statement of household rights and responsibilities.

Recertification Application

State agencies have significant flexibility in terms of the format of the recertification application. State agencies can use their initial application, a simplified version, a monthly reporting form, or other method such as annotating changes on the initial application form.

Whatever form a State agency chooses, the form must meet the following requirements:

- A place for the household to provide a name, address, new signature, and date.
- A request for other information the State agency needs to make an accurate determination of eligibility and benefits, when added to the existing casefile documents.
- A notice indicating that information available through the income and eligibility verification system (IEVS) will be requested, used, and may be verified through collateral contacts.
- A notice describing how noncitizen status may be verified with U.S. Citizenship and Immigration Services (USCIS).
- Inform the household of the disqualification penalties for intentional program violations.
- Inform the household of its right to a fair hearing, of the method by which a fair hearing may be requested, and that its case may be presented by a household member or a representative, such as a legal counsel, a relative, a friend, or other spokesperson.
- Include the Privacy Act Statement.
- Include FNS' Nondiscrimination Statement.
- Meet bilingual requirements.

Best Practices

FNS encourages State agencies to send the recertification application, an interview appointment letter, and a Notice of Required Verification with the Notice of Expiration to help expedite the recertification process. In addition, State agencies are encouraged to attempt contact with the household through means other than the mail, such as telephone or email, to remind households of their recertification requirements in order to avoid a lapse in benefits.

Whatever form the State agency chooses for their recertification application, the application should include clear instructions to the household on how to submit the application.

In addition, FNS encourages State agencies that choose to develop a recertification specific application to include all the information and disclosures required for initial applications, as outlined in 7 CFR 273.2(b)(1), that are not already specifically required for recertification applications. These include:

- A statement that the information provided by the applicant in connection with the application for SNAP benefits will be subject to verification by Federal, State, and local officials to determine if such information is factual.
- A statement that if any information is incorrect, SNAP benefits may be denied to the applicant; and that the applicant may be subject to criminal prosecution for knowingly providing incorrect information.
- In prominent and boldface lettering and understandable terms, a description of the civil and criminal provisions and penalties for violations of the Food and Nutrition Act of 2008.
- A statement to be signed by one adult household member that certifies, under penalty of perjury, the truth of the information contained in the application, including the information concerning citizenship and alien status of the members applying for benefits.
- In plain and prominent language on or near the front page of the application, notification of the household's right to immediately file the application as long as it contains the applicant's name and address and the signature of a responsible household member or the household's authorized representative. Regardless of the type of system the State agency uses (paper or electronic), it must provide a means for households to immediately begin the application process with name, address, and signature.
- In plain and prominent language on or near the front page of the application, a description of the expedited service provisions described in 7 CFR 273.2(i).

Interviews

The interview process follows similar procedures at both certification and recertification. 7 CFR 273.2(e) stipulates specific requirements be met while allowing for substantial flexibility to allow State agencies to adapt the process to accommodate their unique needs. The interview requirement may be met with a face-to-face interview or a telephone interview. At recertification, the State agency must inform each household of the opportunity for a face-to-face interview and must grant one to any household that requests it.

State agencies must generally conduct an interview with a member of the household or its authorized representative at least once every 12 months for households certified for 12 months or less. For elderly and disabled households with certification periods greater than 12 months, States must interview these households at the end of the certification period.

While the State agency has significant flexibility when scheduling recertification interviews, the State agency must schedule the interview to allow households at a minimum 10 days after the interview to provide verifications before their certification period expires. This means all interviews must be scheduled at least 11 days prior to the expiration of the household's certification period. When arranging the interview, the State agency is required to schedule all interviews as promptly as possible and take into

Example

If a household's certification period ends on August 31, the State agency must schedule the interview not later than August 21, so that the household has until August 31 to provide requested verification.

consideration the needs of the household. State agencies may schedule an interview before they receive an application for recertification.

If the household does not appear for the interview, the State agency is required to send the household a Notice of Missed Interview (NOMI). The State agency may choose to combine a NOMI and a notice of denial. If the household subsequently contacts the State agency to reschedule the interview, the State agency must schedule a second interview at least 10 days before the end of the month or as soon as possible.

The State agency is required to conduct the interview in an official and confidential manner that ensures the privacy of the household. The individual interviewed may be any responsible member of the household such as the head of household or spouse, or an authorized representative. The household may bring or have present any person he or she chooses at the interview.

During the interview, the State agency must not simply review the information on the application or case file but also thoroughly discuss and explore the household's circumstances and resolve any unclear or incomplete information. This includes information obtained during the certification period that the State could not act upon. In addition, the State agency must advise the household of their rights and responsibilities, application processing standards, and reporting requirements.

Best Practices

Eligibility workers should attempt to verify as much information as possible prior to the interview via data matching or other methods (e.g. collateral contacts) and also gather any unclear information that surfaced during the certification period or questionable data match results in order to have a productive interview with the household. See the Verification section for additional information on verification requirements at recertification.

In addition, FNS has observed successful processes where State agencies conduct two "cold-calls" upon receipt of the application. If the State agency is successful in reaching the household, the State agency can conduct the interview immediately while on the phone.

Required Notices

In addition to the Notice of Expiration, throughout the recertification process State agencies are required to provide households with the following notices:

- A Notice of Missed Interview for households that failed to attend a scheduled interview, as discussed above.
- A Notice of Required Verification written in clear and simple language, that includes examples of the types of documents the household should provide. More information on this notice is provided in the Verification section below.
- If the State agency uses the income and eligibility verification system (IEVS), a notice describing how IEVS will be used. Many States meet this requirement by including this information on the recertification application.
- For all work registrants, a Notice of Work Requirements explaining to the individual the pertinent work requirements, the rights and responsibilities of work-registered household members, and the consequences of failure to comply must be provided at recertification.

- For households denied eligibility at recertification, a Notice of Denial must be sent.
- For households determined eligible at recertification, a Notice of Eligibility must be sent.

Best Practices

FNS encourages State agencies to inform able-bodied adults without dependents (ABAWD) households of time limit and work requirement rules at recertification. Information on these notifications can be found in the April 10, 2017, *SNAP-Requirements for Informing Households of ABAWD Rules* policy memorandum and the May 26, 2018, *Best Practices and Resources for Informing Households of ABAWD Rules*.

Timely Processing

A household that submits its application for recertification by the 15th day of the last month of the expiring certification period is considered to have applied timely. If such a household meets the recertification requirements before the end of the certification period, the State agency must provide the households with a notice of eligibility or a notice of denial by the last day of the household's certification period. In addition, the household must be provided the opportunity to participate by the end of the household's normal issuance cycle in the month after the household's current certification period expires.

If the State agency is unable to complete the application process by the end of the current certification period, the State agency must determine cause for the delay and follow appropriate procedures. These procedures are described in the "Application Processing Delays" section below.

Example

A household's certification period ends on August 31 and normally receives benefits on the 16th of the month. If the household submits its recertification application on August 14, completes the interview and provides all verification on the 16th, the State agency must complete the recertification process and send a notice of eligibility or a notice of denial by August 31. If the household is eligible, the State agency must make benefits available on the household's EBT card by September 16th.

Best Practices

FNS encourages State agencies to screen recertification applications on receipt and contact households in a timely manner to obtain missing information for incomplete applications rather than waiting until the scheduled interview with the households. Adopting this practice will better serve households who are attempting to continue their benefits and who may otherwise lose benefits and end up submitting new initial applications if their incomplete recertification applications are not pursued.

Treatment of Application as Initial or Recertification

If a household files an application within the 30-day period after the end of their certification period, some State agencies are treating these as initial applications, while others are treating these as recertifications. This inconsistency may impact State reporting on recertifications and initial applications. This may also cause application processing delays in States where

case banking teams focus on either initial or recertification applications and caseworkers are unclear which team should process particular applications.

The ambiguity in the treatment of these applications is a result of two conflicting regulations. 7 CFR 273.10(a)(2) states that if a household submits an application after the household's certification period has expired, the application shall be treated as an initial application. 7 CFR 273.14(e)(3) states that if a household files an application within 30 days after the end of the certification period, the application shall be considered an application for recertification. In addition, this ambiguity has also caused confusion related to the proration of benefits, which is discussed in the "Proration" section.

To clarify this ambiguity, State agencies must consider all applications received within 30 days after the end of the certification period as an application for recertification, as indicated in 7 CFR 273.14(e)(3), and process these applications in accordance with the recertification requirements (i.e. conduct an interview, gather required verifications). As indicated in the preamble to the November 21, 2000, Food Stamp Program: Noncitizen Eligibility, and Certification Provisions final rule, changes were made to the section covering delays in processing recertifications to simplify language and to conform to changes made pursuant to the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA).

Example

If the household certification period ends August 31 and the recertification application is submitted on September 3, the State agency must treat this application as a recertification and follow the recertification requirements. If the household is found eligible, benefits must be prorated, which is discussed in the "Proration" section below.

If the household files a recertification application 31 days or greater from the end of the certification period, the State must follow initial application procedures.

Proration

Proration of benefits at recertification occurs when the recertification process is delayed beyond the end of the expiring certification period due to a household-caused delay. Based on when the application is filed, benefits are either prorated from the date the household takes the required action or from the date of application.

If a household files an application prior to the end of the certification period, regardless of whether the application was submitted by the 15th day of the last month, and the household completes the last outstanding action within 30 days after the end of the certification period, the State agency must provide benefits retroactive to the date the household took the required action.

If a household files an application within 30 days after the end of the certification period and completes all required actions, benefits must be prorated from the date of application.

State agencies retain the options outlined in 7 CFR 273.10(a)(1)(ii) to prorate household's benefits using a standard 30-day calendar or over the exact length of a particular calendar month.

Example

If the household's certification period ends August 31 and the recertification application is submitted on August 12, the interview is conducted on August 21, and all required verifications provided on September 10, the household's benefit allotment for the first month of their new certification period will be prorated from September 10 through September 30 (based on the State agency's chosen proration option).

If the household's certification period ends August 31 and the recertification application is submitted on September 2, interview is conducted September 10, and all required verifications provided on September 15, the household's benefit allotment for the first month of their new certification period will be prorated from September 2 through September 30 (based on the State agency's chosen proration option).

Verification

The verification process is a critical component of both certification and recertification as it ensures households receive an accurate eligibility determination and the appropriate amount of benefits. All certifications (including recertification) must be based on the most current information and not on previously submitted information that is subject to change.

Therefore, during the reapplication process State agencies must verify the elements of eligibility that are subject to change from month to month, including income, deductions, residence, and household composition. Depending upon which State options a State agency has elected, the household's resources may also require verification.

State agencies must ensure information is verified in accordance with 7 CFR 273.2(f)(8)(i), which generally requires the State agency to verify information that has changed or is incomplete, inaccurate, inconsistent, or outdated. This includes information received during the certification period that was not required to be acted on by the State at the time of discovery/receipt. A State agency cannot limit verifications to specific types of documents or proofs but should accept any verification that satisfies a verification requirement. Once the

State agency receives a household's verifications, the State agency should process the verifications as quickly as possible to ensure timely recertification.

During the certification period, the State agency may find questionable information about a household that could pose potential integrity issues. If such issues are found, it is important that the State agency ask questions of the household to clarify the questionable information or to consider a referral for potential fraud. Recertification also provides the opportunity for the State agency to remind the household of recipient integrity requirements. Some possible questions to consider (these examples in particular focus on EBT card usage):

- Is there a high balance on the EBT card? If so, have all sources of income been considered and verified?
- Has the EBT card been used out-of-State? If so, are they neighboring States? Does residency need to be re-verified?

While States have some discretion in terms of whether to verify certain household circumstances that are not questionable or required at recertification, SNAP Quality Control will check the accuracy of the eligibility determination and benefit level, which includes verifying all elements of eligibility.

Best Practices

State agencies are encouraged to utilize automated verification process, such as data matches, in order to reduce the information that the household needs to provide and duplicate work. Any information received through such processes that confirms information provided by the client does not require further verification from the household.

Outdated Verification

While the requirement to verify information that is incomplete, inaccurate, or inconsistent is clear, the term "outdated" has been less so. The lack of clarification of "outdated" has resulted in inconsistent application of the term and as a result, an inconsistent application of the regulations associated with verification. However, this was made clear with the publication of the *Supplemental Nutrition Assistance Program (SNAP): Eligibility, Certification, and Employment and Training Provisions of the Food, Conservation and Energy Act of 2008* final rule on January 6, 2017.

In accordance with 7 CFR 273.10(a)(1), the information the State agency considers at recertification should be accurate and reflect a household's income and deductions for the month of application based upon the most recent information available at the time of recertification.

While verification for the month of application is generally preferable, State agencies may use verification so long as it is no more than 60 days old relative to the first month of the new certification period and the household agrees that it is representative of their circumstances. This clarification is consistent with the recent revisions to 7 CFR 273.12(c)(3) and should also facilitate verification when processing an application in the last month of a household's current certification period. For the prisoner verification, deceased, and National Directory of New Hires data matches, State agencies should follow established procedures for independently verifying this information, as appropriate.

Notice of Required Verification

The State agency must provide each household at the time of application for certification and recertification with a notice that informs the household of the verification requirements the household must meet as part of the application process. At a minimum, the notice must meet the following requirements:

- Provide the verification requirements the household must meet.
- Inform households of the State agency's responsibility to assist cooperating household in obtaining required verifications.
- Contain examples of the types of documents the household should provide and explain the period of time the documents should cover.
- Provide the date by which the verification requirements must be satisfied (at least 10 days from the date of the notice).
- Written in clear and simple language.
- Meet bilingual requirements.

Best Practices

State agencies have flexibility in how they meet the requirements of the Notice of Required Verification. FNS encourages State agencies to identify the specific pieces of information that are required for the household to provide. This practice can reduce the number of questions from households to call centers or offices asking which specific verifications they need to provide.

For State agencies that choose to use a universal notice that outlines all the accepted types of verification, State agencies are encouraged to review FNS' Guide to Improving Notices of Adverse Action that provides a sample universal Notice of Required Verification. This guide can be found on the FNS website.

State agencies should include clear instructions on how households should submit verifications to ensure the verifications are received by the correct State office.

Request for Missing Verification

After a State agency issues a Notice of Required Verification, if a household fails to provide all verification necessary for an eligibility determination, the State agency is required to request the particular verification that is still missing and to give the household at least 10 days to provide the specific missing verification.

It is important to note that even if a State agency provided a household with a specific, tailored Notice of Required Verification at the time of application, the State agency is still required to request particular missing verification if the household has not provided all verification necessary for eligibility to be determined. Furthermore, the State agency must allow the household 10 days from the date the request is made to provide the particular missing verification.

Best Practices

While a State agency has flexibility in how they meet the Request for Missing Verification requirement, States are encouraged to provide households with a written notice that lists each missing document that the State agency needs to verify the household's circumstances, the amount of time an applicant has to provide the information, where to send the information, and the consequences of not providing the verification timely.

Verification Timelines

A household must be allowed a minimum of 10 days to provide required verification information. In instances when an interview is required, State agencies are required to schedule recertification interviews so that the household has at least 10 days after the interview in which to provide verification before the certification period expires.

If there are less than 10 days remaining in the certification period and the State agency notifies the household of missing verification, the 10 days given the household to provide missing verification will extend beyond the end of the current certification period.

If the State agency cannot determine eligibility by the end of the certification period due to the time period allowed for submitting any missing verification, the household shall receive an opportunity to participate, if eligible, within 5 business days of the date it submits the missing verification; benefits cannot be prorated.

Best Practices

FNS encourages State agencies to consider sending the Notice of Required Verification with the Notice of Expiration rather than waiting until receiving a recertification application; this allows ample time for households to submit required verifications. In addition, FNS encourages State agencies to screen recertification applications upon receipt and contact the household in a timely manner to obtain missing information for incomplete applications. Adopting this practice will better serve households who are attempting to continue their benefits and who may otherwise lose benefits and end up submitting new initial applications if their incomplete recertification applications are not pursued.

Application Processing Delays

The cause of any delay in processing a recertification application must be determined under 7 CFR 273.2(h)(1) and benefits provided accordingly. In general, if the delay was the fault of the household, benefits are prorated from the date of compliance. If the State agency was at fault, benefits are provided for the full month.

Delays caused by the household

Even if the household is at fault for the delay, the State agency remains subject to regulatory requirements for rescheduling interviews and providing households with 10 days to submit requested missing verification. Any household whose eligibility is not determined by the end of its current certification period due to the time period allowed for submitting missing

verification must be provided an opportunity to participate, if eligible, within 5 business days after the household submits the missing verification; benefits cannot be prorated.

If a household files an application before the end of the certification period but fails to take a required action, the State agency may deny the case at the end of the expiring certification period. In addition, the regulations also provide the flexibility for the State agency to deny the case at the time the household failed to take the required action or at the end of 30 days from the date of application. Whatever choice is made must be applied consistently across the caseload.

If the household takes the required action before the end of the certification period, the State agency must reopen the case and provide a full month's benefits for the initial month of the new certification period. If the household takes the required action after the end of the certification period but within 30 days after the end of the certification period, the State agency must reopen the case and provide benefits retroactive to the date the household takes the required action.

If the household submits an application within 30 days after the end of the expiring certification period and subsequently meets all recertification requirements, benefits must be prorated from the date of application as outlined in the Proration section.

As a reminder, if the household files a recertification application 31 days or greater from the end of the certification period, the State must follow initial application procedures.

Best Practices

For households that apply prior to the end of the certification period but fail to take a required action, FNS encourages State agencies to implement the option of denying the case at the end of the certification period. This option can help reduce household confusion, re-work, and churn.

Delays caused by the State agency

If a household files an application before the end of the certification period but processing is delayed beyond the end of the certification period due to the fault of the State agency, the household, if eligible, must receive a full month's benefits for the new certification period.

If a household files an application within 30 days after the end of the certification period and the State agency is at fault for causing the application to be filed after the certification period (i.e. failed to offer assistance to complete the application), the household, if eligible, must receive a full month's benefits for the new certification period.

Example

A household's certification period ends on August 31 and the application for recertification is submitted August 15, the interview is conducted August 20, but the household fails to provide required verification by August 30.

However, all required verification is received on September 3. For the first month on the new certification period, the State would provide benefits for September 3 – 30.

Example

A household's certification period ends on August 31 and the application for recertification is submitted August 15, the interview is conducted and all required verification is submitted on August 20. However, due to staffing issues, the State does not process the case until September 3. The household is entitled to its full monthly benefit for September.

Expedited Service

If a household files a recertification application in the month after their certification period ends, the household must receive expedited service if eligible in accordance with 7 CFR 273.2(i)(1). State agencies must screen for expedited service for any household that applies after the end of the certification period and, if determined eligible for expedited service, the household must have an opportunity to participate within 7 days from the date the recertification application was filed.

Appendix 1

Recertification Application Review Tool

This tool contains a checklist State agencies can use to review their recertification application.

Best Practices

As outlined in the October 6, 2017, *SNAP – Issues with Certification Materials Submission Instructions* memorandum, State agencies should review their recertification application to ensure it is customer friendly and provides clear and accessible instructions to encourage households to submit their materials to the correct location. While reviewing the application, State agencies should also consider the following:

- ☐ Describe multiple ways to submit certification materials: mailing address, online, in-person, telephone.
- ☐ Provide submission instructions in multiple locations, including after the last question/signature box on certification materials.
- ☐ Use visual cues to mark the submission instructions prominently on the application (e.g. use of bold/colored font, icons, shaded boxes or bullets, and appropriate spacing).
- ☐ Include a pre-addressed envelope.
- ☐ Avoid using URLs as the only way to access a county/local office mailing address;
- ☐ Include an attachment with county/local office mailing addresses.
- ☐ Review certification materials with applicants and clients to gather feedback for improvements.

Additionally, State agencies are encouraged to review the *Best Practices for Online SNAP Applications*. While this guide is focused on initial online applications, the best practices can be applied, when appropriate, to the recertification application. [Click Here to Download the Best Practices for Online SNAP Applications](#)

Recertification Application Checklist

Citation	Requirement	✓
273.14(b)(2)	A place for the household to provide a name, new signature, and date the application.	
273.14(b)(1)(ii)(D)	A place for the household to provide their address.	
273.2(b)(2)	Inform the household through a written statement on or provided with the application form that information available through IEVS will be requested, used, and may be verified through collateral contacts when discrepancies are found by the State agency, and that such information may affect the household's eligibility and level of benefits.	
273.2(b)(2)	Inform the household through a written statement on or provided with the application form that describes how noncitizen status may be verified with U.S. Citizenship and Immigration Services (USCIS).	
273.14(b)(2)	Elicit sufficient information that, when added to information already contained in the casefile, will ensure an accurate determination of eligibility and benefits.	
273.16(d)	Inform the household of the disqualification penalties for intentional program violations.	
273.15(f)	Inform the household of its right to a fair hearing, of the method by which a fair hearing may be requested, and that its case may be presented by a household member or a representative, such as a legal counsel, a relative, a friend, or other spokesperson.	
273.2(b)(4)	Include the Privacy Act Statement.	
FNS Instruction 113-1	Include FNS' Nondiscrimination Statement.	
272.4(b)(3)	Application is provided in appropriate language(s) as specified in 272.4(b)(3)(i) and (ii).	

Appendix 2

Recertification Notices Review Tool

This tool contains checklists State agencies can use to review some of the most common notices used during the SNAP recertification process.

- Notice of Expiration (NOE)
- Notice of Required Verification
- Notice of Missed Interview (NOMI)
- Notice of Eligibility
- Notice of Denial

Best Practices

As outlined in the October 6, 2017, *SNAP – Issues with Certification Materials Submission Instructions* memorandum, State agencies should review any notices that request households to submit certification materials to ensure they are customer friendly and provide clear and accessible instructions to encourage households to submit their materials to the correct location. While reviewing notices, State agencies should also consider the following:

- ☐ Describe multiple ways to submit certification materials: mailing address, online, in-person, telephone.
- ☐ Provide submission instructions in multiple locations including after the last question/signature box on certification materials.
- ☐ Use visual cues to mark the submission instructions prominently on the application (e.g. use of bold/colored font, icons, shaded boxes or bullets, and appropriate spacing).
- ☐ Include a pre-addressed envelope.
- ☐ Avoid using URLs as the only way to access a county/local office mailing address;
- ☐ Include an attachment with county/local office mailing addresses.
- ☐ Review certification materials with applicants and clients to gather feedback for improvements.

Additionally, State agencies are encouraged to review the *Guide to Improving Notices of Adverse Action (NOAAs)*. While this guide is focused on the NOAA, the best practices can be applied, when appropriate, across notices. [Click Here to Download the Guide to Improving Notices of Adverse Action](#)

Notice of Expiration Checklist

Citation	Requirement	✓
273.14(b)(1)(ii)(A)	Date household's certification period expires.	
273.14(b)(1)(ii)(B)	Date by which a household must submit an application for recertification in order to receive uninterrupted benefits (this date must be 15 days prior to the last day of the household's current certification period).	
273.14(b)(1)(ii)(C)	The consequences of failure to apply for recertification in a timely manner.	
273.14(b)(1)(ii)(D)	Notice of the right to receive an application form upon request	
273.14(b)(1)(ii)(D)	Notice of the right to submit an application and have it accepted as long as it contains a signature and a name and address.	
273.14(b)(1)(ii)(E)	Information on alternative submission methods available to households which cannot come into the certification office or do not have an authorized representative and how to exercise these options.	
273.14(b)(1)(ii)(F)	The address of the office where the application must be filed.	
273.14(b)(1)(ii)(G)	The household's right to request a fair hearing if the recertification is denied or if the household objects to the benefit issuance.	
273.14(b)(1)(ii)(H)	Notice that any household consisting only of Supplemental Security Income (SSI) applicants or recipients is entitled to apply for SNAP recertification at an office of the Social Security Administration.	
273.14(b)(1)(ii)(I)	Notice that failure to attend an interview may result in delay or denial of benefits.	
273.14(b)(1)(ii)(J)	Notice that the household is responsible for rescheduling a missed interview and for providing required verification information.	
272.4(b)	Notice is provided in appropriate language(s) as specified in 272.4(b)(3)(i) and (ii).	

Notice of Required Verification Checklist

Citation	Requirement	✓
273.2(c)(5)	Informs the household of the verification requirements.	
273.2(c)(5)	Inform the household of the State agency's responsibility to assist the household in obtaining required verification provided the household is cooperating with the State agency.	
273.2(c)(5)	Written in clear and simple language.	
273.2(c)(5)	Contain examples of the types of documents the household should provide.	
273.2(c)(5)	Explain the period of time the documents should cover.	
273.14(b)(4)	Date by which verification requirements must be satisfied. <i>Note: The date should be at least 10 days to provide required verification.</i>	
272.4(b)	Notice is provided in appropriate language(s) as specified in 272.4(b)(3)(i) and (ii).	

Notice of Missed Interview Checklist

Citation	Requirement	✓
273.2(e)(3)	Notifies household that they missed the interview.	
273.2(e)(3)	Notifies households of their responsibility to reschedule the missed interview.	
272.4(b)	Notice is provided in appropriate language(s) as specified in 272.4(b)(3)(i) and (ii).	

Notice of Eligibility Checklist

Citation	Requirement	✓
273.10(g)(1)(i)(A)	Amount of allotment.	
273.10(g)(1)(i)(A)	Beginning and ending dates of certification period.	
273.10(g)(1)(i)(A)	Advises household of variations in the benefit level based on changes anticipated at the time of certification.	
273.10(g)(1)(i)(A)	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 allotment includes more than 1 month's benefits, and shall indicate the monthly allotment amount for the remainder of the certification period.	
273.10(g)(1)(i)(A)	Right to request a fair hearing.	
273.10(g)(1)(i)(A)	Telephone number of the SNAP office (a toll-free number or a number where collect calls will be accepted for households outside the local calling area).	
273.10(g)(1)(i)(A)	Name of the person to contact for additional information (if possible).	
273.10(g)(1)(i)(A)	Name and contact info for an organization that provides free legal services (if available).	
273.10(g)(1)(i)(A)	Reminder of the household's obligation to report changes in circumstance and of the need to reapply for continued participation at the end of the certification period (this is optional to include but a best practice).	
272.4(b)	Notice is provided in appropriate language(s) as specified in 272.4(b)(3)(i) and (ii).	

Notice of Denial Checklist

Citation	Requirement	✓
273.10(g)(1)(ii)	Explanation of the basis of denial.	
273.10(g)(1)(ii)	Right to request a fair hearing.	
273.10(g)(1)(ii)	Telephone number of the SNAP office (a toll-free number or a number where collect calls will be accepted for households outside the local calling area).	
273.10(g)(1)(ii)	Name of the person to contact for additional information (if possible).	
273.10(g)(1)(ii)	Name and contact info for an organization that provides free legal services (if available).	
273.10(g)(1)(ii)	For households that are potentially categorically eligible, request that the household notify the SNAP office if it is approved for public assistance or SSI benefits.	
273.10(g)(1)(ii)	If the State agency has chosen to use a notice of denial when a household fails to take action to complete the application process, the notice shall advise the household of the action it must take to reopen its application; that the case will be reopened without a new application if action is taken within 30 days of the end of the certification period; and that failure to do so means the household has to file a new application if they wish to participate.	
272.4(b)	Notice is provided in appropriate language(s) as specified in 272.4(b)(3)(i) and (ii).	