



Department of Human Services
 311 West Saratoga Street
 Baltimore MD 21201

**FAMILY INVESTMENT ADMINISTRATION
 (FIA) INFORMATION MEMO**

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TO: LOCAL DEPARTMENTS OF SOCIAL SERVICES (LDSS) DIRECTORS, LDSS DEPUTY/ASSISTANT DIRECTORS FOR FAMILY INVESTMENT, FAMILY INVESTMENT SUPERVISORS AND ELIGIBILITY STAFF

FROM: AUGUSTIN NTABAGANYIMANA, ACTING EXECUTIVE DIRECTOR *Augustin*

RE: APPLICATION PROCESSING TIMELINESS RATE AND CORRECTIVE ACTION PLAN

PROGRAM AFFECTED: SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP)

ORIGINATING OFFICE: OFFICE OF OPERATIONS

SUMMARY

The purpose of this Information Memo (IM) is to clearly outline the federal requirements regarding Application Processing Timeliness, provide the state’s initial assessment of the root causes for non-compliance, and offer steps that each local department must take to improve. The Food and Nutrition Service has approved the Maryland Application Processing Timeliness (APT) Corrective Action Plan per 7 CFR 275.17.

Federal Requirements:

Maryland must meet and sustain the U.S. Department of Agriculture Food and Nutrition Service Application Processing Timeliness rate (FNS APT Rate) of 95% by September 30, 2024. As of January 31, 2024, our statewide APT was 88.14%.

Initial Assessment of the root causes for non-compliance:

- **Differing methodologies for calculating Application Processing Timeliness (APT) :** The method that Maryland uses to measure application timeliness is different from that of the United States Department of Agriculture Food and Nutrition Service (FNS). Maryland’s methodology excludes all approved and denied applications that are due to client delays. In September and October 2023 alone, client delays represented 10% of

the approved SNAP cases.

Maryland's own application timeliness calculation methodology also considers applications flagged as no-fault as being timely. A no-fault code means that the delay was beyond the control of the department and the client. In the Eligibility and Enrollment (E&E) system, until very recently, case managers were able to place a no fault delay code for cases pending unresolved system tickets.

FNS measures timeliness using the following formula: Total Timely Approvals/Total Approved x 100. FNS includes client delays in the denominator. Whereas Maryland has an established standard operating procedure for monitoring state application compliance since 2018, Maryland has focused on a different set of parameters.

While the State's APT rate methodology was developed independent of the federal government and for a different purpose, Maryland recognizes the misalignment may lead to confusion among staff.

- **XSNAP Interview Waiver:** In Maryland, XSNAP cases make up approximately 30% of all applications processed. XSNAP has a 7-day timeline. Returning to interviews this year after a 13-month waiver presented hardship constraints on staff, especially as caseloads remained high compared to pre-pandemic levels.
- **Caseload-to-staff:** There is a correlation between the caseload-to-staff ratio and the ability to meet the FNS APT rate benchmark. The jurisdictions with the four lowest FNS APT rates were among the top six jurisdictions with the highest caseload-to-staff ratio: Baltimore County, which has an APT rate of 64.62% carries a caseload of 662 cases per worker, Wicomico County has an APT rate of 66.05% has a caseload of 894 cases per worker, Montgomery County which has an APT rate of 78.35% is at 712¹ cases per worker, and Prince George's County has the rate of 80.82% at 657 cases per worker. Five jurisdictions with caseload-worker ratios ranging between 191 and 373 met the FNS APT rate.

Steps to Improve Application Processing Timeliness Rate:

- **Outreach and Awareness Campaign**
 - In January through February 2024, FIA central met with the Assistant Director and Directors of each of the 24 Local Departments of Social Services to go over the FNS APT measure and how it differs from the State's own APT rate. These conversations involved deep review of each jurisdiction's APT rate, root causes for non-compliance (if applicable), and jurisdiction-specific strategies for improvement.

¹ Based on updated staffing data from Montgomery County received on 2/23/2024 the caseload is 558.

- FIA provided an overview of the APT requirements during January 2024 all FIA staff Connecting The Dots session.
- A revamped Application Compliance Workgroup: During the first meeting held on February 8, 2024 the following topics were covered: Current FNS APT data, Corrective Action Plan and CAP Worksheet, Technical Assistance Points of Contact, Best Practices, Workload Sharing and updates on long term initiatives.
- **Interview Waiver**
 - In October 2023, Maryland was approved by FNS to waive interviews for applications and recertifications. By pursuing the waiver, the State sought to increase processing speed and effort has paid off. Since then, the State's APT rate has increased by nearly two percentage points. The State will continue to leverage this waiver as one of the key strategies to improve timeliness.
- **Workload Sharing**
 - During the COVID-19 Public Health Emergency, the State of Maryland implemented a statewide workload sharing strategy to a positive effect. Considering the variations in the staff-to-client ratios across the state, Maryland has begun the process of institutionalizing workload sharing in its operational model. The state is finalizing changes in the E&E system in order to effectively implement workload sharing. Upon the completion of the system changes, Maryland will prioritize Baltimore County, Montgomery County, Prince George's County, and Wicomico County in immediate Work Sharing opportunities because they are responsible for approximately 39% of the SNAP caseload and currently average 72.58% FNS APT for FFY 24. The state will enroll these jurisdictions in workload sharing by April 1, 2024.

Expectations for Local Departments

In addition to statewide efforts that FIA has or plans to take, each local department must move urgently to :

- Develop a strategy to meet or maintain the 95% APT rate for FFY 2024 at a jurisdictional level by March 31, 2024.
- Develop a strategy to sustain a 95% APT rate for FFY 2024 at a jurisdictional level .
- Make eligibility determinations on SNAP applications deemed eligible for expedited services within three days of the application date.
- Make an eligibility determination on any SNAP application that is ready to work within 15 days of the application date.
- Positively influence customer behavior by consistently determining the eligibility of customers who provide all required information with the application, ahead of the due date.
- Only use client or agency delay codes when appropriate in the administrative field within the Eligibility & Enrollment System (E&E).
- Notify the customer if additional information/verification is required, no more than 10 days from the application date.

- Update the returned verifications upon receipt to enable more timely processing.
- Use the “Reopen” process when addressing a late redetermination packet submitted by the customer.
- Use the “Reopen” process when the customer submits a new application for a program for which the customer previously applied.
- Monitor Case and Procedural Error Rates (CAPER) reports from the Bureau of Quality Control.
- Scan, and upload verifications into the Case Documents/Enterprise Content Management when appropriate.
- Review Case Documents for verifications and if the written request for verification (1052) remains outstanding, make a call to the customer to obtain/verify outstanding mandatory verifications.
- Nominate a representative on the Application Compliance Workgroup and participate in workload sharing to assist jurisdictions below the APT Rate including Montgomery County.
- Prorate SNAP applications that remain pending beyond 30 days per 412.2C of the SNAP Manual:

Steps for Prorating SNAP applications:

(available in the Repeat Audit Finding Refresher Training)

1. Do not deny the original application.
2. In the original application, navigate to the Program Request Screen.
3. Change the requested date for each household member to the date that the verifications were received in the agency.
 - a. Run Electronic Disqualified Recipient System (EDRS).
 - b. Click Next.
4. Do not change the application date.
5. After clicking Next, a pop-up window will display a warning that states, “Application date is different from Requested Date. Are you sure you want to proceed?”
 - a. Click Yes
6. Update the case to reflect the verification(s) received.
7. Run Eligibility.
 - a. The month of application will be Denied.
8. Click the “Eye” Icon for the month the verification was received.

Technical Assistance and Monitoring

The Family Investment Administration’s Office of Local Operations (OLO) will provide Technical Assistance (TA) to local jurisdictions as they develop steps to improve. OLO will also monitor compliance statewide and by jurisdictions to ensure that we, as a state, are making progress toward meeting the APT. We have created an [APT Compliance Smartsheet](#) to ensure that you have a real time read of our progress. OLO will take the following actions, as necessary, to support local departments:

1. Jurisdictions that did not meet the FFY24 APT benchmark of 95% as of January 31, 2024, will receive a Corrective Action Plan (CAP) request, with 10 days to respond. The request

will also include a CAP Worksheet.

2. Jurisdictions whose FFY 24 APT fall below 95% in the subsequent months will receive a CAP the first week of the new month.
3. Jurisdictions with less than 95% APT rate two out of the four weeks in February 2024 will receive TA. The TA includes a descriptive assessment from FIA and a review of the CAP worksheet from the local department.

INQUIRIES:

Please direct policy questions to FIA Policy by completing the [FIA Policy Information Request Form](#). Montgomery County staff may submit their policy questions via email at fia.policy@maryland.gov. For questions related to E&E, please email fia.bsdm@maryland.gov.

cc: DHS Executive Staff
FIA Management Staff
Constituent Services
DHS Help Desk
Office of Administrative Hearings

MARYLAND FNS APT MONTHLY AND FFY24 RATE BY JURISDICTION

(Including prorated approvals as timely)

Jurisdiction	October 23	November 23	December 23	January-24	FFY 24
Allegany County	96.84%	98.32%	98.29%	98.78%	98.03%
Anne Arundel County	92.31%	93.63%	95.28%	95.37%	94.08%
Baltimore City	94.14%	96.35%	97.06%	97.70%	96.27%
Baltimore County	70.37%	61.60%	65.68%	71.03%	67.33%
Calvert County	91.18%	94.52%	97.74%	97.21%	95.18%
Caroline County	94.20%	98.39%	95.73%	95.68%	95.95%
Carroll County	72.83%	84.30%	95.39%	96.32%	86.97%
Cecil County	94.49%	94.44%	97.08%	94.37%	95.03%
Charles County	88.87%	86.45%	91.83%	91.92%	89.71%
Dorchester County	95.77%	96.09%	96.26%	93.46%	95.32%
Frederick County	94.36%	95.23%	95.85%	94.81%	95.03%
Garrett County	96.55%	98.68%	100.00%	93.02%	96.75%
Harford County	95.92%	96.32%	95.30%	96.57%	96.08%
Howard County	94.81%	94.46%	94.16%	96.15%	94.94%
Kent County	98.63%	98.41%	98.31%	100.00%	98.81%
Montgomery County	78.21%	80.51%	86.58%	91.63%	84.00%
Prince George's County	79.29%	84.02%	77.80%	84.49%	81.42%
Queen Anne's County	97.62%	90.32%	89.33%	97.17%	94.19%
Saint Mary's County	93.10%	95.56%	96.40%	95.96%	95.17%
Somerset County	84.73%	85.83%	90.00%	90.52%	87.58%
Talbot County	94.68%	97.80%	98.63%	99.08%	97.55%
Washington County	87.24%	84.74%	83.37%	82.78%	84.62%
Wicomico County	62.40%	72.91%	78.59%	81.25%	73.55%
Worcester County	97.24%	98.10%	95.92%	95.63%	96.70%
State FNS APT	86.31%	87.24%	88.39%	90.58%	88.14%

**INCREMENTAL GOAL AND MONTHLY PERCENTAGE INCREASE
FOR JURISDICTIONS THAT ARE BELOW THE 95% FNS APT RATE**
(Including prorated approvals as timely)

Jurisdiction	Incremental Goal by March 2024	% of Increase by November	% of Increase by December	% of Increase by January
Anne Arundel County	0.92%	1.43%	1.76%	0.09%
Baltimore County	27.67%	-12.46%	6.62%	8.15%
Carroll County	8.03%	15.75%	13.16%	0.97%
Charles County	5.29%	-2.72%	6.22%	0.10%
Howard County	0.06%	-0.37%	-0.32%	2.11%
Montgomery County	11.00%	2.94%	7.54%	5.83%
Prince George's County	13.58%	5.97%	-7.40%	8.60%
Queen Anne's County	0.81%	-7.48%	-1.10%	8.78%
Somerset County	7.42%	1.30%	4.86%	0.58%
Washington County	10.38%	-2.87%	-1.62%	-0.71%
Wicomico County	21.45%	16.84%	7.79%	3.38%
State FNS APT	6.86%	1.08%	1.32%	2.48%