

Policy Clarifications - Food Stamp PFS12979576

(Revised 5/23/06)

Submitted: 4/4/06

Agency: CAOs

Citations:FSH [576.4](#)

Subject: Untimely Recertification Issues

A household submits a PA 600R on April 2, but the certification period ended on March 31. This is considered an untimely recertification. We have some questions on how to apply the procedure in FSH 576.4. This is a very common occurrence.

1. According to FSH 576.4, in the scenario above benefits are prorated to April 2, if the household is otherwise eligible. With respect to the PA 600R, is this treated as an application requiring an expedited services review?
2. The household submitted a PA 600, rather than the PA 600R, on April 14 after receiving the confirming notice stating that FS benefits have terminated. Would the PA 600 be treated as an application in all respects?

Response By: Denise Hoffman

Date: 5/3/06

Yes, an expedited service review would be required. Expedited services does not apply if the household reapplies before the end of the certification period. Since the form was received after the end of the certification period, a review for expedited services is necessary. [7 CFR 273.2(i)(4)(v)]

~~As long as there has not been a full month intervening before a renewal form is received by the CAO, it would not matter if the household submitted the PA600 or the PA600R. It would still be considered an untimely renewal and not an application.~~ **The household may submit either an untimely renewal form or a new application and benefits will be prorated, unless the delay is caused by the CAO.**

~~Once the certification period has ended and there has been a full month intervening before a renewal form is received by the CAO, the CAO will require a new application to be completed. However, if the client sends in a PA 600R within 60 days, the Food and Nutrition Service has okayed the use of the PA 600R in place of a PA 600. The household does not need to complete a PA 600R and PA 600 in this situation.~~

Note: ~~If the household submits a renewal form prior to the application form, the CAO will use the date the recertification form is received to calculate benefits. Attach the renewal form to the new application for auditing purposes.~~