

# **EXHIBIT 1**

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE

ERIN BULL, MISSAES DESJARDINS,	)	
EMILY GUGLIELMELLI, TRISTA	)	
HUBBARD, CANDICE JACQUES,	)	
REZ'HANA MADDOX, SHERAY	)	
OMINYI, CANDACE PEGUES, and	)	
THE CONTRIBUTOR, INC., a	)	
Tennessee-based non-profit corporation,	)	
	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 3:25-cv-41
	)	
CLARENCE H. CARTER, in his official	)	
capacity as Commissioner of the	)	
Tennessee Department of Human	)	Chief Judge William Campbell
Services,	)	Magistrate Judge Jeffery Frensley
	)	Special Master Ed Stanton
Defendant.	)	

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DEFENDANT'S PROPOSED PHASE 1  
PRELIMINARY INJUNCTION REMEDIAL PLAN

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## **Executive Summary**

This remedial plan provides the Tennessee Department of Human Services’ (“DHS”) proposed corrective actions to address issues related to its administration of the Supplemental Nutrition Assistance Program (“SNAP”).

In this remedial plan, DHS proposes to take corrective action in five areas:

1. **EBT Card Delivery:** DHS will begin tracking the delivery date of EBT cards, analyze that delivery data, and assess the need for further improvements.
2. **Expedited Application Processing:** DHS will schedule interviews earlier in the eligibility determination process to reduce delays in benefit issuance.
3. **Collaborative Process to Revise Notices:** DHS will engage in a collaborative process with Plaintiffs and the Special Master’s team to revise certain notices.
4. **Revision of Other Notices:** DHS will revise three additional notices that involve minor language or formatting changes through a non-collaborative process.
5. **Appeals Hearings:** DHS will allow appellants to choose between in-person and telephonic hearings.

DHS has also created a strategic communication plan to provide information on the proposed changes to current and prospective SNAP customers, DHS employees, and community members. It has additionally created a framework for the continued implementation and monitoring of the changes, including proposed implementation dates and a plan to provide certain data to the Special Master at specified intervals.

Finally, DHS has appended a detailed background of the corrective actions already taken by DHS to this remedial plan.

## **Remedial Plan**

### **I. Background<sup>1</sup>**

#### **A. Parties and Posture**

Plaintiffs are eight individuals and one organization—a non-profit for the homeless—who have sued DHS Commissioner Clarence Carter in his official capacity. Plaintiffs generally allege that DHS mismanages certain aspects of the SNAP program, resulting in delayed decisions on applications, delayed mailing of electronic benefit transfer (“EBT”) cards to SNAP recipients, delayed decisions on appeals, issues with notices, and issues with restoration of lost benefits.

Plaintiffs moved for a preliminary injunction to alter DHS’s administration of SNAP on all these issues. (Dkt. 23.) Due to Commissioner Carter’s position that certain issues needed to be remedied, the Court directed the Parties to work with a special master on the areas that should be included in a preliminary-injunction remedial plan.<sup>2</sup> (Dkts. 62, 81.) The Court appointed Ed Stanton as special master.

#### **B. SNAP Administration**

SNAP is a federal government program that provides food-purchasing assistance to low-income households. 7 U.S.C. §§ 2011 to 2036d; 7 C.F.R. §§ 271.1 to 285.5. The U.S. Department of Agriculture administers SNAP at the federal level through its Food and Nutrition Service (“FNS”) agency. 7 C.F.R. § 271.3(a). In Tennessee, DHS is the state agency responsible for administering SNAP. Tenn. Code Ann. § 71-5-304.

Within DHS, the Family Assistance Division (“Family Assistance”) processes initial and

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<sup>1</sup> Appendix 1 provides a more detailed background.

<sup>2</sup> Commissioner Carter took this position prior to the Supreme Court’s decision in *Medina v. Planned Parenthood S. Atl.*, 606 U.S. 357 (2025). Due to *Medina*, Commissioner Carter maintains that Plaintiffs lack a cause of action for four of the five claims in their complaint. (Dkts. 94, 95, 101.) However, without waiving that argument, in the spirit of good faith and collaboration, he has extensively collaborated with Plaintiffs and prepared this remedial plan.

recertification SNAP applications. All adverse decisions by Family Assistance regarding a household's SNAP benefits may be appealed to the Appeals and Hearings Division ("Appeals and Hearings") of DHS, which processes SNAP appeals.

In June 2023, Family Assistance and Appeals and Hearings began transitioning from an outdated system to a new software platform, the Electronic Benefits Management System ("EBMS"). Appendix 1 Part II.A. The move to EBMS marked a major technological upgrade for DHS and its customers, but not without challenges. During the transition, Family Assistance staff experienced lower efficiency while the entire eligibility process was being converted. Appeals and Hearings experienced a dramatic increase in SNAP appeals as well. The transition led to a backlog of both applications and appeals. Appendix 1 Part II.B.

Family Assistance took numerous corrective actions to correct these delays and backlogs. Appendix 1 Part III. Nearly all these actions were taken or initiated prior to the present lawsuit. Family Assistance launched the 90-Day Get Well Plan; developed a workload management process; identified and solved personnel issues; and made other process changes, such as providing customers the option to have an on-demand interview when they call DHS or simplifying certification for elderly or disabled customers. *Id.* It also made the new OneDHS customer portal more customer-friendly in ways that helped reduce call center wait times. *Id.* These corrective actions had the desired effect. The 30-day timeliness rate has remained above 95% since August 2024, with many months at 99%.

Appeals and Hearings also made numerous changes to address the appeal timeliness rate. Appendix 1 Part IV. It created the Volume Management Plan, restructured staff, and improved the OneDHS portal. *Id.* Due to these and other changes, appeals filed on or after February 3, 2025, were processed within the federally required timeframe.

### **C. Restoration of Benefits**

DHS has long had a process that complied with the regulation governing the restoration of lost benefits. 7 C.F.R. § 273.17. However, until Plaintiffs filed this lawsuit, DHS was unaware that a separate regulation related to fair hearings, 7 C.F.R. § 273.15(j)(1)(i), required it to treat certain late-filed appeals as requests for restoration of lost benefits. Appendix 1 Part V. After learning this requirement, DHS immediately began corrective action. *Id.* DHS became compliant on March 1, 2025, by publishing and implementing three policy documents that require Appeals and Hearings to provide late-filed appeals to Family Assistance, which reviews them as requests for restoration of benefits. *Id.* Between February 2025 and October 2025, 141 late-filed appeals have been treated as requests for restoration of benefits.

## **II. Future Remedial Actions DHS Agrees to Take**

The remedial actions discussed in this section, as well as the concessions made by Plaintiffs, are made for the purposes of the Preliminary Injunction. Neither party waives its right to assert defenses or seek relief on these items in the future.

### **A. Tracking Delivery of SNAP EBT Cards**

#### **1. Background**

Plaintiffs allege that DHS is not deciding SNAP applications or delivering SNAP EBT cards within the federally required timeframes for expedited, 30-day, and recertification applicants. DHS disputes this claim as to the timeliness of its decision-making for 30-day and recertification applications. However, DHS is willing to explore ways to improve the timeliness of EBT card mailings. To do so, DHS must be able to reliably determine the date of card delivery.

Currently, DHS contracts with a third-party vendor, Fidelity National Information Services, Inc. (“FIS”) to provide all EBT card services for the SNAP program. These services include establishing customer accounts, providing account management, providing customer service

support, issuing and replacing EBT cards, providing retailer management services, and generating reports. FIS issues a card to a SNAP customer upon receiving the request from DHS, which usually comes through a daily “batch” file transferred from EBMS. If DHS makes the request before 11:00 a.m., FIS will postmark the EBT card on the same day.<sup>3</sup> Issuance requests after 11:00 a.m. will be postmarked the next day. The EBT card is shipped in an inactive status and remains inactive until the customer completes the instructions found on a sticker on the front of the card, which includes steps to verify identity and set up a personal identification number.

EBT cards are mailed to SNAP customers via first-class, postage-prepaid U.S. mail by CardPro, the FIS-contracted EBT card vendor, from their facility located in San Antonio, Texas. In certain limited circumstances, DHS may request a different type of mail delivery without incurring additional cost. However, the current contract does not require, nor funds, the tracking of the first-class mail pieces, which comprise the overwhelming majority of EBT cards issued. Therefore, while DHS can pull a report from the FIS system (“EbtInsight”) to collect data on card issuance dates, card activation by the customer, or the date of first transaction, DHS does not have a source for tracking actual delivery timeframes. DHS has been examining issuance dates, card activation dates, and dates of first transaction to determine if these could predict a reasonable estimate of delivery date. Unfortunately, those dates are too variable to be reliable measures.

## **2. Summary of Steps Involved to Address the Issue**

DHS envisions a three-phase process for tracking EBT cards. First, it will amend or supplement its existing contract to require that FIS track EBT card deliveries. Second, it will accumulate two months of data on EBT card deliveries to ensure the process is working as planned. Third, during months three to five of tracking delivery data, DHS will assess the acquired

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<sup>3</sup> The FIS contract states 1:00 p.m. However, in October 2024, DHS informally agreed to 11:00 a.m. due to the volume of card requests.

information to, if needed, determine feasible solutions for improving EBT card mail times.

### **3. Actions Already Taken to Resolve the Issue**

DHS has approached the issue from several angles. As mentioned above, DHS analyzed the data currently available to determine if there was sufficient information to make reasonable assumptions about the delivery date of EBT cards. But DHS found that activation dates or dates of first transaction were not reliable data sets.

As a result, DHS requested and received a mailing “test” from different CardPro facilities (Texas, Illinois, and Florida). The test cards all arrived within five business days of mailing. DHS believes that, given the tests and the average processing time for 30-day applications, the delivery of 30-day EBT cards is likely timely.<sup>4</sup>

DHS also began discussions with FIS about available options. Along with the mail tests, FIS explored implementing delivery tracking as a pilot program that could start immediately; however, it was not able to absorb the costs of running a pilot program. Ultimately, DHS determined that the most expedient path forward was an amendment or additional contract with FIS to include delivery tracking as a term of the contract.

### **4. Future Actions to be Taken to Resolve the Issue**

**Phase 1:** DHS will procure a supplemental contract with FIS to provide for Intelligent Mail Barcode (“IMB”) on first-class mailing. With IMB, DHS will receive reports from FIS of the actual delivery date of EBT cards. Using that data, DHS will analyze whether there is a need to change delivery methods and, if so, the different delivery options required to meet the required timeframes. The following chart identifies the necessary steps, stakeholders, and anticipated completion date involved in the contract modification process:

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<sup>4</sup> The average processing time for 30-day applications in October 2025 was 11.2 days from application to decision.

**Table 1. FIS Contract Modification.**

Action	Stakeholders	Completion Date	Status
Initiate discussion with FIS about feasibility of adding delivery tracking under existing contract.	DHS FIS	August 2025	Complete
Request/receive quote for addition of delivery tracking to current services.	DHS FIS	August 2025/September 2025	Complete
Draft new scope for contract.	DHS	October 15, 2025	Complete
Final review of contract scope.	DHS FIS	December 15, 2025	Pending
Begin contract process through state procurement channels. <sup>5</sup>	DHS CPO (for approval of contract template language) COT (for approval of contract language and obligations) FRC (for legislative approval)	December 30, 2025	Pending – Completion of each contract step will be communicated to the Special Master if requested.
Coordinate administrative steps needed for implementation with FIS.	DHS FIS	Beginning January 5, 2026	Pending
Confirm with Special Master date that tracking services will begin following execution of the contract.	DHS Special Master	TBD	TBD

**Phase 2:** As requested by the Special Master, DHS will provide an update on the new

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<sup>5</sup> DHS does not control the timeframes for movement of a contract through the state procurement process. Therefore, it is difficult to provide expected completion dates for each of the external stakeholders listed here.

process, including identification of any issues or problems. DHS will also provide any EBT card mail tracking reports made available by FIS so that the Special Master and DHS can begin assessment of the delivery timeframes. Based on the Special Master's assessment, a schedule may be implemented for regular reporting to the Special Master to review actual delivery timeframes. The following table identifies the actions, stakeholders, and anticipated completion date for the steps involved in creating a reliable EBT-card delivery reporting structure:

**Table 2. Reporting EBT Card Deliveries.**

Action	Stakeholders	Completion Date	Status
DHS will begin work with FIS to create an automated report through EbtInsight.	DHS FIS	During the FIS implementation period, to be negotiated in the supplemental contract.	Pending
DHS will provide an update to the Special Master confirming that the process and reporting elements are on track for implementation.	DHS Special Master	As requested.	Pending
DHS will provide regular reports and updates as required by the Special Master.	DHS Special Master	As requested.	Pending

**Phase 3:** In months three to five following the implementation of IMB tracking, DHS will assess the tracking data to determine the necessity of changing the EBT card delivery model from its current practice. If the data reveals that a change to the current process is required, based on the number or type of delayed cards, DHS will propose a supplement to this remedial plan designed to improve the timeframes for delivery of SNAP benefits to SNAP customers.

## **5. Required Resources**

DHS requested FIS pricing for IMB tracking on first-class mailings. The preliminary cost information shared to date reflects:

- One-time system change cost: \$77,200
- Ongoing operational cost: approximately \$5,550 per month

DHS does not expect additional personnel will be needed to receive and analyze the tracking reports from FIS.

## **6. Expected Outcome**

With reliable delivery data, DHS can analyze whether the current process satisfies the federal requirement for benefit access by our customers. DHS expects to learn key information, including whether delivery times to parts of the state differ, whether there is a difference between delivery of expedited and regular SNAP benefits, and whether the U.S. Postal Service provides consistent delivery according to the expected timeframes established in their Postal Service Standards. Obtaining this data before implementing a delivery solution, should one be needed, will ensure that DHS is a good steward of the limited administrative dollars allocated to the program, as it will enable DHS to implement a focused solution. If the current process is not satisfactory, these factors, along with any additional insights gleaned, will determine the type of solution that will suffice. DHS is already examining the Plaintiffs' recommendations and other possible solutions. Following receipt and analysis of the delivery tracking data, DHS will be well-positioned to plan implementation of a new process, if necessary.

Plaintiffs have offered several proposals designed to deliver loaded EBT benefits to individuals who qualify for expedited benefits. Of these, issuing unloaded cards earlier in the

process to be loaded later if approved, appears the most feasible.<sup>6</sup> In fact, DHS had already begun researching this option before receiving Plaintiffs' recommendation. This solution appears to be the best fit within the existing framework of EBT card processing and staffing considerations. However, DHS maintains that card-tracking data must be obtained before moving forward with such a solution.

## **7. Expected Completion Date**

Because this is an ongoing collaboration with FIS, DHS is unable to give a precise date for when it anticipates completing all three phases of the process above. But, as a good faith estimate, the process to implement mail delivery tracking through the state contracting process, identified as Phase 1, should take approximately five (5) months.

## **B. Improving Decision Times on Expedited Applications**

### **1. Background**

When a customer applies for SNAP, three main steps are necessary to determine eligibility: (1) the customer must complete and sign an application, (2) the household or its authorized representative must be interviewed, and (3) certain information on the application must be verified.<sup>7</sup> During the second step, interviews, both the household and DHS have a responsibility to share and convey required information. The interview must be scheduled as promptly as possible to ensure eligible households receive an opportunity to participate within 30 days after the application is filed or within 7 days if they are found eligible for expedited services.<sup>8</sup> Currently, the scheduling of these interviews is the primary source of delay for processing expedited applications. The proposal in this section is designed to modify the current timeframes for

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<sup>6</sup> Recommendation No. 2, Letter from Plaintiffs to DHS, *Potential Considerations for Remedial Plan* (June 27, 2025).

<sup>7</sup> 7 C.F.R. § 273.2(d)(1).

<sup>8</sup> 7 C.F.R. § 273.2(e)(3); DHS Policy 24.02.

scheduling interviews and change the manner in which DHS communicates the date and time of interviews, thus allowing speedier resolution of expedited applications and creating more time for EBT card delivery.

DHS currently provides several options for scheduling interviews. DHS offers a “self-schedule” option that allows customers to schedule their own appointment for any available date and time when they apply through the customer portal.<sup>9</sup> Expedited appointments are available on the portal between the second and fourth business days after the date of application. Next, customers who apply for benefits in person at a county office have the option to complete their interview at the time their application is submitted. Alternatively, customers may schedule an interview appointment before leaving the county office. DHS staff verbally inform the customer of the appointment date and time, provide an office visit receipt, and document the case record. The last option covers applications submitted by mail, fax, office external drop box, and online applications where the customer elected not to self-schedule. For these cases, DHS creates a daily batch file in EBMS to schedule the earliest available appointment starting on the fourth business day following the date of application.

When interviews are scheduled through the batch file process, EBMS generates a notice to the customer with the interview date and time. The notices are available on the customer portal to those with accounts and are also mailed through the U.S. Postal Service. DHS contracts with the Tennessee Department of General Services for mailing the notices. Often, because interviews are set within a matter of days after the application is filed, written notices arrive after the scheduled appointment; however, the portal notices are available immediately. This process often leads to

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<sup>9</sup> Recent data shows that over 60% of interview appointments are scheduled through the customer portal.

missed appointments if the mail is late, or it creates confusion if the notice arrives in the mail after a completed interview.

Further, if an interview is conducted on or after the fourth business day, only one day typically remains in the expedited timeframe to approve, process, and submit the case to FIS for card production and mailing.<sup>10</sup> It should be noted that many cases move through the process more quickly. For instance, an interview may be conducted on the same day the application is filed or immediately following the date of application. In addition to the card-tracking data, DHS agrees to implement the changes set out below. These changes are included in the remedial plan to improve decision times for expedited applications, but will also benefit 30-day applications.

## **2. Summary of Steps Involved to Address the Issue**

DHS will make several changes to the existing process. First, applicants who self-schedule interviews can currently only select dates beginning two days after they apply. Under the new approach, applicants will be able to schedule their own interviews as early as the day after they apply, provided appointment times are available. Second, DHS will adjust the batch file to schedule expedited interviews on the second business day rather than the fourth business day. Third, while DHS will continue to provide electronic notice of the interview time to all applicants, it will also mail interview appointment notices to, at a minimum, customers who apply by mail, fax, office external drop box, or who elect not to self-schedule when applying online that include language explaining how to reschedule an interview if the notice arrives after the interview date.<sup>11</sup> DHS will continue its current practice of providing notices following any missed interviews that explain how to reschedule.

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<sup>10</sup> Except for applications submitted on Mondays, the fourth business day is six calendar days.

<sup>11</sup> It is unlikely that these notices will reach customers before their scheduled interviews. But they may enable customers to reschedule faster than if they waited for the Notice of Missed Interview.

### **3. Actions Already Taken to Resolve the Issue**

Over time, DHS has employed various methods for scheduling and conducting interviews. Improvements to systems and technology have provided customers with better options and enhanced case processing. DHS now offers an online customer portal for case management and communications, provides customers with “robo” calls and texts, and also provides access to online scheduling so that customers can self-schedule their interviews.

In 2025, DHS began exploring the impact of scheduling interviews earlier in the process. DHS researched the practices of other states and learned that its proposed process of scheduling interviews on or before the fourth calendar day following application is substantially similar to that in other states. DHS also contacted FNS to request clarification regarding notice requirements. FNS replied that while sending a written notice to the household informing it of the date, time, and location is best practice, it does not require state agencies to send a written notice when scheduling a household for a SNAP interview.

### **4. Future Actions to be Taken to Resolve the Issue**

This change will require modifications to DHS policy and procedure documents, EBMS changes, staff training, and changes to outward-facing communication documents and channels.

**Table 3. Changing Interview Scheduling Process.**

Action	Stakeholders	Completion Date	Status
Request Level of Effort (“LOE”) from Deloitte to change self-schedule option allowing for scheduling immediately following application.	DHS	December 1, 2025	Pending
Request LOE from Deloitte to change batch file process	DHS	December 1, 2025	Pending

from fourth day to second day scheduling.			
Begin work with STS and Public Information and Legislative Office (“PILO”) staff to identify changes that can be made internally to communicate change to customers.	DHS	January 1, 2026	Pending
Draft changes to applicable Policy and Procedure documents.	DHS	January 30, 2026	Pending
Communicate upcoming changes to DHS SNAP staff.	DHS	February 28, 2026	Pending
Finalize development and testing; go live with changes.	DHS Deloitte KPMG STS	May 30, 2026	Pending
Notify customers and external stakeholders.	DHS	May 30, 2026	Pending

## 5. Required Resources

DHS expects the costs of these system changes to be incorporated into the existing contract with Deloitte and our normal operations with STS. DHS does not expect additional personnel will be needed to implement these changes, although additional staff time will be required to inform and train staff on the revised process.

## 6. Expected Outcome

DHS expects the earlier interview process to result in an earlier approval time for cases where customers do not self-select an interview or participate in same-day interviews. Earlier approval times will enable DHS to submit cases to FIS sooner, which should result in customers receiving their EBT cards sooner. However, it should be noted that, until the practice becomes

commonly understood by customers, DHS expects an initial, temporary increase in the number of customers missing their appointments and seeking to reschedule their interviews.

## **7. Expected Completion Date**

DHS expects that the policy and procedures, system, and communication changes can be completed by June 1, 2026.

## **C. Collaborative Notice Revisions**

### **1. Background**

DHS also agrees to participate in a collaborative process with the Plaintiffs and the Special Master's team to review and revise specific, agreed-upon notices. The notices subject to this collaborative process are as follows:

- a. Revise the Notice of Decision to add clarifying language to these reasons for adverse action:<sup>12</sup>
  - i. Household does not meet eligibility criteria;<sup>13</sup>
  - ii. Failed to keep Application [or Renewal] appointment;
  - iii. Certification Period has ended;
  - iv. Change in circumstance; and
  - v. Income exceeds income limit.

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<sup>12</sup> Each of these items are individual reason codes. It is possible that a notice may include multiple reason codes, such as “Certification Period Has Ended, The household does not meet eligibility criteria.” By addressing individual reason codes, notices with multiple codes will be resolved as well.

<sup>13</sup> The original agreement between the parties was limited to the “household does not meet eligibility criteria” reason code. Plaintiffs have since identified additional reason codes for revision. In reply, DHS provided information to clarify which text is displayed to customers since some codes differ from the actual language on the notice, and others are not used to generate notices seen by customers. DHS is willing to discuss the language of the additional codes in this list, provided the changes do not interfere with TANF coding or require infeasible individualization.

- b. Revise the Notice of Delay (“Notice of Pending Status”) to include language consistent with 7 C.F.R. § 273.2(h);
- c. Provide notification to customers denied expedited status of the option for an agency conference pursuant to 7 C.F.R. § 273.15(d);
- d. Clarify the Consolidated Work Notice to show which household members are subject to specific work requirements, like ABAWD; and
- e. Clarify the Simplified Reporting Notice to show which household members are subject to simplified reporting, including a provision for elderly and disabled prior to the interim contact form.

DHS provided a general outline to the Special Master’s team and Plaintiffs of its internal process for creating or changing notices. Changes to notice language often involve changes to system logic, which require complex coding to set the conditions upon which the notice is generated. However, individualized customization may not be possible in all circumstances due to the complexity of EBMS or the consequences of changing some codes that affect other programs, notices, or internal processes. Additionally, DHS must adhere to its existing technology schedule to manage the development, testing, roll-out, communications, and training involved when such changes are made.

Because the notices involved in the collaborative process will involve both language and logic changes, they must go through the Change Request process, which follows a series of defined process stages to ensure accuracy, compliance, and system stability. The first stage, Discovery, ensures that the vendor fully understands the requested system change and that the scope of work is frozen before design begins. Discovery typically takes between six and eight weeks. Without this control, requirements can shift mid-cycle, directly increasing the risk of introducing defects

that cannot be adequately traced or validated.

The next stage is Design, which documents how policy requirements will be implemented in system logic and notices. In other words, it is the translation of policy into logic. Design can last between three and five weeks. If this step is shortened or bypassed, the resulting implementation may apply policy incorrectly.

The next stage is Development. Development occurs after Discovery and Design have finished and usually takes eight weeks. This step involves executing the logic approved in the prior stages. Deviating from the timeline for this stage can lead to unapproved logic paths or incomplete implementations, potentially resulting in unintended eligibility outcomes or customer notifications that do not reflect program rules.

Once the code is developed, the next stage is System Integration Testing, which verifies that each change functions correctly within the broader integrated system. System Integration Testing typically takes four weeks. Skipping or reducing this step substantially increases the likelihood of defects that impact interconnected modules, leading to incorrect calculations, notice errors, or operational disruptions.

The next stage is User Acceptance Training, which confirms that the change behaves correctly when applied to real-world case scenarios and regulatory conditions. This stage generally takes four weeks. Without User Acceptance Training, there is a heightened risk that the deployed changes will function inconsistently.

The penultimate step is Operational Readiness, a process that ensures all environments, data conditions, deployment procedures, and communication materials are fully prepared. Operational Readiness usually takes one week, and removing this control can lead to system instability, incomplete deployment, and customer-facing errors.

The final stage is Go-Live, where a change is officially deployed. This step occurs only after all prior stages have been completed, ensuring the released functionality is compliant, stable, and properly validated.

Each stage serves as a safeguard to maintain compliance with SNAP program requirements, federal notice standards, audit expectations, and customer due-process protections. Compressing or bypassing any of the stages introduces measurable risk, including incorrect eligibility determinations, inaccurate or incomplete customer notices, noncompliance with federal regulations, audit findings or corrective action plans, operational instability or system outages, or unintended impact to other scheduled releases. While established stages and timelines are required to ensure compliance, accuracy, and system stability, certain process components may be accelerated based on the lack of complexity of the change, provided a documented, risk-based assessment supports them.

## **2. Summary of Steps Involved to Address the Issue**

The parties, together with the Special Master’s team, will implement a collaboration plan that includes reviewing DHS drafts, discussions of their language, and field testing. DHS will not agree to changes to the notices that exclude federally required language. For efficiency, all notices identified above will be reviewed simultaneously. DHS will submit drafts of the notices by December 23, 2025. After the draft notices are provided, the collaborative process will begin as set forth in the section below.

## **3. Actions Already Taken to Resolve the Issue**

Earlier this year, DHS prepared draft revisions for the “notice of delay” and the “notice of decision” as contemplated in the Unopposed Order Granting Preliminary Injunctive Relief in Part (Dkt. 64). These drafts were provided to the Special Master’s team in July. In August, the parties and the Special Master’s team began discussing options to improve the readability of these notices.

In September, DHS reached out to Family and Children's Services ("FCS") in Nashville to explore the possibility of establishing field testing with consumers on an expedited timeframe. Discussions are ongoing; however, the rough outline of DHS's plan is to prepare a packet of information that the FCS staff could use with no more than 15 FCS customers who are or have been SNAP recipients. The packet would provide the notices under consideration, instructions or directions about what is to be reviewed, and a way to provide feedback.<sup>14</sup>

#### **4. Future Actions to be Taken to Resolve the Issue**

Scheduling this effort will require input from the Plaintiffs and the Special Master's team; therefore, the dates below are proposed dates, subject to the review and agreement of all parties. It should be noted, however, that changes to the schedule may affect the release date.

**Table 4. Collaboration Plan for Notice Revisions**

Action	Stakeholders	Completion Date	Status
DHS revises identified notices, including a readability analysis, and prepares a summary of any issues or complications with such revisions, if applicable.	DHS	December 23, 2025	Pending
DHS submits revisions to the Special Master's team and Plaintiffs.	DHS Special Master's Team Plaintiffs	December 23, 2025	Pending
First meeting with parties and Special Master's Team to	DHS Special Master's Team	January 12, 2026	Pending

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<sup>14</sup> DHS is also exploring software options for readability analysis. In consultation with technology partners at STS, DHS signed up for a limited test subscription of a program called Grammarly. Additionally, DHS has access to artificial intelligence tools to test the readability of notices. Both options are promising, and DHS may use them in tandem with focus groups.

discuss revisions and provide feedback to DHS.	Plaintiffs		
Consumer review feedback period.	DHS FCS	January 15-22, 2026	Pending
Second meeting with parties and Special Master's Team to review customer feedback and submit final recommendations to DHS.	DHS Special Master's Team Plaintiffs	January 29, 2026	Pending

At the close of the collaborative process, DHS will take the agreed-upon notice revisions to its vendor to determine the release schedule for the changes. At this point, the level of complexity of the changes will be known. Some notice changes may be less complex and fit into earlier releases, while others may require an extensive production process and necessitate a later release.<sup>15</sup>

**Table 5. Notice Development**

Discovery.	DHS Deloitte	TBD	Pending
DHS will send a final draft to Special Master's team.	DHS Special Master's Team	TBD	Pending
Design.	DHS Deloitte	TBD	Pending
Development.	DHS Deloitte	TBD	Pending
System Integration Testing and User Testing (UAT).	DHS Deloitte KPMG	TBD	Pending
Operational Readiness and Go Live.	DHS Deloitte	TBD	Pending

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<sup>15</sup> Commissioner Carter recognizes Plaintiffs' opposition to any timeline that does not match their proposed schedule in their Nov. 12, 2025 letter. As stated in their Nov. 20, 2025 letters, the Parties anticipate presenting this dispute to the Special Master during the collaboration process.

DHS will develop training and procedural documents to inform SNAP staff of these changes. DHS estimates that these efforts can be accomplished during the testing phase, when the notices or amendments will be at a final stage.

## **5. Required Resources**

If DHS follows the regular release schedule for system modifications and can include requested changes within that schedule, then aside from unknown collaboration and field-testing expenses, there should be no additional cost. DHS and Deloitte have a quarterly release schedule, with a maximum budget of \$2.5 million for each release. However, this assumes that other system modifications do not exhaust the work hours contemplated by that budgeted amount. If these notice revisions, when included with other necessary system work, exceed the planned amount, DHS will update the Special Master with the additional resources required. Or, if DHS is ordered to implement these revisions with a new, off-cycle contract with its vendor, DHS will need to prepare a new scope of work, obtain a quote and determine budget feasibility, determine a timeline for the project, and, after receiving the required internal approvals, complete the procurement process.

DHS will commit staff time and resources to the collaborative process, including the potential costs associated with field testing. DHS will also commit staff time and resources to the internal administrative changes related to these notice revisions. DHS staff will work with Deloitte and other technology partners on the requested changes to provide sufficient discovery materials, feedback during the design process, user testing, and Go-Live communication. Until the extent of design complexity is known, however, DHS cannot estimate the number of hours this will take. The notice changes will also require policy changes, internal procedure updates, and staff training.

## **6. Expected Outcome**

DHS expects that by following the collaborative process, the identified notices will contain easily understandable language with clear instructions.

## **7. Expected Completion Date**

The completion date will depend on the outcome of the collaborative process. If the collaborative process aligns with the full cycle of the next regular release schedule following the submission of the remedial plan, Release 12.0.

### **D. Notice Revisions to be Made Through a Non-collaborative Process**

#### **1. Background**

Over the past few months, as a result of ongoing discussions and in consideration of arguments raised in the Plaintiffs' Response to Commissioner Carter's Motion to Exclude Submitted to the Special Master, DHS withdrew objections to several requests made by Plaintiffs. As noted below, the scope of these changes is different, so they are not included in the collaborative process schedule contemplated above. DHS maintains that it is compliant with the applicable federal regulations without making each of these changes.

First, Plaintiffs request that DHS change the Interim Contact Form for Elderly and Disabled as follows: remove the word "if" and replace it with "as."<sup>16</sup> Because this change is straightforward, DHS will make this change outside of the collaborative process.

Second, Plaintiffs request that DHS change the Yellow Appeals Notice to inform appellants that federal regulations require a written decision within 60 days of an appeal's filing if the appellant does not reschedule the hearing.<sup>17</sup> Based upon Plaintiffs' agreement to abandon their request that DHS insert language informing appellants of potential legal action and remedies, DHS has agreed to make this change. Because this change is straightforward, DHS will make it outside of the collaborative process.

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<sup>16</sup> See Plaintiffs' Response in Opposition to Defendant's Motion to Exclude Submitted to the Special Master, p. 21.

<sup>17</sup> *Id.* at pp. 13-14.

Third, Plaintiffs request that the fair hearing language be made more prominent in Overpayment Demand Letters by separating the appeal notice language from preceding overpayment information and changing the wording from “fair hearing” to “appeal.”<sup>18</sup> DHS has agreed to make these two changes outside of the collaborative process in exchange for Plaintiffs committing to seek no further changes for Joint List Category 3.D.e. Because these changes are straightforward, DHS will make them outside of the collaborative process.

## **2. Summary of Steps Involved to Address the Issue**

DHS contacted its vendor to initiate the process of updating the three notices. DHS will provide the language for the changes to the vendor and will participate in discovery, design, production, and testing sessions.

## **3. Actions Already Taken to Resolve the Issue**

DHS has held internal discussions on each request. It has also met with its vendor to ensure the changes are feasible and to obtain an estimate of the time required to implement them.

## **4. Future Actions to be Taken to Resolve the Issue**

Because the updates involve language changes with little to no logic changes and they will not require extensive discovery, design, production, or testing, DHS believes the vendor can add them to an existing release, Release 11.0.<sup>19</sup> DHS will take the following actions as described below.

**Table 6. Schedule for Initiating Changes to Notices in this Section**

Action	Stakeholders	Completion Date	Status
Submit changes to the vendor for the Interim Contact Form, Yellow Appeal Insert, and	DHS Deloitte	December 16, 2025	Pending

<sup>18</sup> *Id.* at pp. 26-27.

<sup>19</sup> Depending on a number of circumstances related to development, it may be possible to fit one or more of the changes into Releases 10.1 or 10.2. If this becomes feasible, DHS will do so.

Overpayment Demand letter.			
Discovery, design, development, and testing.	DHS Deloitte KPMG	December 17, 2025, through April 7, 2026	Pending
Go live.	DHS Deloitte	April 8, 2026	Pending

## 5. Required Resources

If DHS follows the regular release schedule for system modifications and can include requested changes within the modification schedule, there should not be any additional cost. DHS and Deloitte have a quarterly release schedule, with a maximum budget of \$2.5 million for each release. However, this assumes that other system modifications do not exhaust the work hours contemplated by that planned amount. If these notice revisions, when included with other necessary system work, exceed the planned amount, DHS will update the Special Master with the additional resources required. Or, if DHS is ordered to implement these revisions with a new, off-cycle contract with its vendor, DHS will need to prepare a new scope of work, obtain a quote and determine budget feasibility, determine a timeline for the project, and, after receiving the required internal approvals, complete the procurement process.

DHS will commit staff time and resources to the internal administrative changes related to these notice revisions.

## 6. Expected Outcome

While DHS has agreed to the above changes as concessions to Plaintiffs in the spirit of collaboration, it does not expect significant, quantifiable changes as a result of the language revisions regarding these three items. However, even though the outcomes might be difficult to quantify, DHS welcomes the opportunity to improve clarity for its customers.

## **7. Expected Completion Date**

DHS expects that the language changes can be made in Release 11.0, which is currently scheduled to go live on April 8, 2026.

### **E. Providing a Choice of Hearing Options to Appellants**

#### **1. Background**

Plaintiffs seek changes to the current system for scheduling appeals. In Recommendation 11 of their June 27, 2025 letter, Plaintiffs recommend that DHS schedule all hearings as telephonic hearings but also maintain the option for in-person hearings if the appellant prefers.

DHS has always offered telephonic hearings to appellants who request them. For years, customers who submitted an appeal on a hard copy of DHS Form HS-3058 have had the option to select their preferred hearing format, a choice that DHS always respected. Currently, DHS sets the majority of appeals on telephonic dockets with one in-person docket scheduled per day based on the availability of an Administrative Judge, availability of an Appeals Coordinator, and the appellant's county of residence. If an appellant wishes to change the type of docket (from telephonic to in-person or in-person to telephonic), they can do so by contacting the Appeals and Hearings Division's Clerk's Office to request a continuance to have the appeal changed to the docket type of their choosing. The instructions for changing the docket type are provided within the current Notice of Hearing. The Notice of Hearing for both in-person and telephonic dockets sets forth the docket time, location, and method through which the hearing will be conducted. The content of the Notice of Hearing contains all elements as required by 7 C.F.R. § 273.15(l)(1)-(4).

DHS maintains that its existing system for scheduling appeals is compliant with all federal requirements. However, DHS agrees to make the changes described in this section based on Plaintiffs' concession that it will forgo seeking preliminary relief for continuation of benefits.

## **2. Summary of Steps Involved to Address the Issue**

DHS will make changes to the customer portal, internal processes for Appeals and Hearings staff, and written materials. Appeals and Hearings staff will address volume changes for setting dockets, completing hearings, and producing written dispositions.

## **3. Actions Already Taken to Resolve the Issue**

DHS contacted Deloitte to ascertain the possibility of changing the customer portal to allow for selection of either telephonic or in-person hearings. Further, DHS is analyzing its appeal volume compared to other states and the manner in which they schedule and hold hearings. DHS is currently reviewing other technology platforms that will ease the administrative burden of increased telephonic hearings, in the event larger changes will be required. Some simpler solutions are also being considered, such as using robo-texts to remind customers of the hearing date, time, and location. DHS is also planning to implement automated hearing reminder phone calls to appellants one week prior to their scheduled hearing with the specific date and time.

DHS also met with another contractor, Accenture, to discuss how the existing call center used by the DHS customer service could be used to facilitate telephonic hearings. While initially promising, it appears that the system cannot route appellants who call in to their assigned Administrative Judge at the scheduled time; therefore, it does not add much value to the current system.

## **4. Future Actions to be Taken to Resolve the Issue**

**Phase 1:** DHS will update the OneDHS Customer Portal to ask the Appellant how they would like their appeal to be heard. The Customer Portal will ask the following question as part of the appeal filing process:

In addition to the OneDHS Customer Portal being updated as described above, there will be other internal changes required to ensure customers can exercise a choice of hearing type, set forth below.

**Table 7. DHS Steps to Implement Telephonic Option**

Action	Stakeholders	Completion Date	Status
Request whether Deloitte can activate hearing preference on OneDHS Customer Portal.	DHS Deloitte	October 2, 2020	Complete
Deloitte confirms activation of hearing preference question.	DHS Deloitte	January 30, 2026	Pending
Update Appeals and Hearings Website FormStack for filing appeals to include hearing preference.	DHS	January 30, 2026	Pending
Provide directive to staff to inquire if Appellant would like phone or in-person appeals when filing via email or phone call to DHS.	DHS	January 30, 2026	Pending
Revise wording in the Notice of Hearing for phone appeals	DHS STS	April 2026	Pending

to set forth Appellant responsibilities.			
Activate automated hearing reminder phone calls to appellants one week prior to their scheduled hearing with the specified date and time.	DHS Deloitte Accenture	July 2026	Pending

**Phase 2:** DHS will convert four vacant positions into positions that can impact the management of appeal volume. DHS will reclassify these positions into two DHS Administrative Judge positions, one Appeals Generalist position, and one Appeals Coordinator position. DHS anticipates that the positions could be filled by April 2026.

**Phase 3:** DHS will closely monitor appeal hearing volume and the timeliness of appeals for three consecutive months to ensure the change in scheduling process remains feasible. DHS will provide reports to the Special Master upon request or upon any cadence requested by the Special Master.

If data reflects that DHS might not remain timely with decisions and dispositions due to the increased volume of telephonic hearings, DHS will continue searching for technological options that could increase efficiency. As referenced in Plaintiffs' Recommendation 12, this could include a video solution, but DHS would most likely utilize established state procurement tools, such as a request for information, to solicit possible solutions. However, DHS believes that the above steps will allow it to remain timely and does not anticipate that it will need to utilize this part of Phase 3.

## **5. Required Resources**

DHS has already developed the changes needed for the Customer Portal, as pictured above. The remaining steps to implement this change can be carried out using existing staff and resources.

## **6. Expected Outcome**

DHS expects an increase in telephonic hearings. Volume will be closely monitored to assess

whether DHS can maintain its timeliness rates and whether offering a choice makes a significant impact on dispositions.

### **7. Expected Completion Date**

DHS anticipates that the Customer Portal will be changed to allow customers to choose between an in-person and a telephonic hearing by January 30, 2026.

## **III. Strategic Communication Plan**

As DHS implements the changes in this remedial plan, it will ensure that any necessary information about these changes is properly conveyed to relevant stakeholders, consisting of current and prospective SNAP customers, DHS employees, and community members.

### **A. Communicating with Current and Prospective SNAP Customers**

For many of the changes discussed in this remedial plan, DHS will communicate with SNAP customers by directly altering the documents at issue. For example, DHS will not need to notify SNAP customers that it is updating a reason for adverse action to make it clearer. Rather, the customer will be made aware of the change if they receive a Notice of Decision with the new reason for adverse action. Similarly, SNAP customers will be informed of their choice to schedule in-person or telephonic appeals because the option will be prominently listed on every appeal form and will be provided verbally if they submit an appeal over the phone or in person.

For other changes, DHS will work on more comprehensive communication processes as needed. For example, if DHS adopts a process that allows certain customers to receive unloaded EBT cards, then DHS will implement a plan to notify customers of the unique nature of these EBT cards that may involve verbal communications during SNAP interviews, stickers on the unloaded card, and additional written information provided by text message, the DHS website, the customer portal, or in mailed notices.

## **B. Communicating with DHS Employees**

DHS provides staff with updates on new processes through a variety of methods, including written Process Update Notifications, routine and special training sessions, and verbal or written communications from managers in the regular course of business. DHS will provide process updates to DHS employees regarding changes resulting from this remedial plan that may impact their work—such as the new ability for appellants to choose between in-person and telephonic hearings—and will use the communication method most appropriate for each individual change.

## **C. Communicating with Community Members**

Many of the changes outlined in this remedial plan do not require communication with individuals other than SNAP customers and DHS employees. However, community members who represent SNAP customers through the application and appeals processes will learn of the changes in the natural course of their representation because the changes will be communicated to them in the same way that they will be communicated to SNAP customers.

## **IV. Continued Implementation and Monitoring**

DHS sets out the following proposal for updating the Special Master, but as indicated above, it is willing to provide additional reports and updates on other topics should that be helpful for the Special Master's review.

### **A. Data Reporting**

DHS will provide data to the Special Master at regular intervals. By the 15th of the month following a monthly reporting period, it will provide the Special Master with the following: the State APT rate, the State RPT rate, the QC APT rate, the appeals timeliness rate, and the number of late-filed appeals treated as requests for restoration of benefits. It will provide the FNS-366B form quarterly by the 15th of the month after the form is submitted to FNS.

**B. Tracking Delivery of SNAP EBT Cards**

Tables 1 and 2 (at pages 9-10) provide proposed dates related to the implementation. DHS will provide regular reports and updates to the Special Master, as requested.

**C. Improving Decision Times on Expedited Applications**

Table 3 (at page 15) provides proposed dates related to the implementation.

**D. Notice Revisions to be Made Through a Collaborative Process**

Tables 4 and 5 (at pages 21-22) provide proposed dates related to the implementation, and the Parties anticipate presenting disputes about the notice release timeline to the Special Master.

**E. Notice Revisions to be Made Through a Non-collaborative Process**

Table 6 (at page 25) provides proposed dates related to the implementation.

**F. Providing Hearing Options for Appellants**

Table 7 (at page 29) provides proposed dates related to the implementation.

## **Appendix 1 – Detailed Background**

### **I. Federal SNAP Framework**

SNAP is a federal government program that provides food-purchasing assistance to low-income households. 7 U.S.C. §§ 2011 to 2036d; 7 C.F.R. §§ 271.1 to 285.5. The U.S. Department of Agriculture (“USDA”) administers SNAP at the federal level through its Food and Nutrition Service (“FNS”) agency. 7 C.F.R. § 271.3(a). While the federal government sets the program’s requirements, participating states are responsible for certifying eligibility for benefits, issuing benefits, and otherwise administering the program at the state level. 7 U.S.C. §§ 2013(A), 2020(a), (d), (e), 2025(a). In Tennessee, DHS is the state agency responsible for administering SNAP. Tenn. Code Ann. § 71-5-304. Congress and FNS have established a complex framework of statutes and regulations that state agencies like DHS must follow, two categories of which are particularly relevant to this case. *See, e.g.*, 7 U.S.C. § 2020; 7 C.F.R. §§ 273.1-277.18.

First are the timeliness requirements for application processing. 7 U.S.C. § 2020(e)(3), (9); 7 C.F.R. § 273.2(g)(1), (i)(3)(i). Depending on an applicant’s circumstances, DHS has seven or thirty days to process an initial application and either deny the application or provide the applicant with benefits loaded onto an Electronic Benefit Transfer (“EBT”) card. 7 C.F.R. §§ 271.2, 273.2(g), (i)(3)(i), 274.2(b). SNAP recipients must also apply for recertification at certain intervals, and if they do so by the 15th day of the month in which their benefits will expire, DHS must process the recertification applications before the end of that month. 7 C.F.R. § 273.14(c), (d). DHS must interview each applicant and verify that the information in the application is accurate. 7 C.F.R. § 273.2(e)(3), (f), (g)(3), (i)(4)(i). Applicants must cooperate with DHS’s interviews, verification, and, if required, the quality control process. 7 C.F.R. § 273.2(d). And DHS must issue notices throughout the application-review process about matters including interviews, required

documentation, and DHS's decision on the application. 7 C.F.R. § 273.2(c)(5), (e), (g)(3).

Second are the timeliness requirements for processing appeals. When DHS denies a SNAP application or takes an adverse action related to a recipient's SNAP benefits, it must notify the applicant or recipient, explain the adverse action, and inform them of their right to request a fair hearing. 7 C.F.R. §§ 273.10; 273.13; 273.15. Applicants and recipients may request a hearing within 90 days. 7 C.F.R. § 273.15(g). And those recipients who are receiving benefits may have the benefits continued during their appeal if they appeal within the 10-day, adverse-notice period provided in the notice of adverse action. 7 C.F.R. §§ 273.13(a)(1), (3), 273.15(k)(1). After receiving the request, DHS has 60 days to conduct a fair hearing, reach a decision, and notify the applicant of the decision. 7 C.F.R. § 273.15(c). When an applicant requests a fair hearing more than 90 days but less than one year after an adverse action, DHS must deny the request as untimely and treat it as a request for restoration of lost benefits. 7 C.F.R. §§ 273.15(g), (j)(1)(i), 273.17.

FNS requires state agencies administering SNAP to monitor and report their compliance with requirements. 7 C.F.R. §§ 275.2, 275.3. FNS considers an application processing timeliness rate ("APT") of 95% "acceptable performance." Updated Guidance for Improving State Agency APT Rates: Standardizing the Escalation Process, Dep't Agriculture FNS (Aug. 1, 2024), <https://perma.cc/48E3-MXXE>. If a state agency falls below a 95% timeliness rate, FNS may require it to participate in "corrective action planning." 7 C.F.R. § 275.16.

## **II. DHS Administration of SNAP**

Within DHS, the Family Assistance Division ("Family Assistance") processes initial and recertification SNAP applications, utilizing approximately 2,000 staff positions and maintaining field offices open to the public in all 95 Tennessee counties. Family Assistance staff are responsible for reviewing SNAP applications, scheduling and conducting interviews with applicants, verifying

applicant-submitted information, and determining eligibility for SNAP benefits within the federally mandated timeframes.

All adverse decisions by Family Assistance regarding a household's SNAP benefits may be appealed to the Appeals and Hearings Division ("Appeals and Hearings") of DHS, which processes SNAP appeals. Everyone who files a SNAP appeal is offered a fair hearing conducted in person or telephonically by an Administrative Judge.

#### **A. Transition from Legacy Software Platform to Modern Platform**

Until 2023, Family Assistance and Appeals and Hearings operated on separate, outdated software platforms that lacked customer portals and made the application and appeals processes inefficient by modern standards. In June 2023, DHS transitioned to the Electronic Benefits Management System ("EBMS"), a unified platform designed to streamline processes and improve efficiency for DHS and its customers. The EBMS customer portal, OneDHS, enables DHS customers to file SNAP applications and appeals, upload supporting documents, view case information, make accommodation requests, and access DHS notices and administrative orders—all electronically and in one place. The move to EBMS marked a major technological upgrade for DHS and its customers, but one not without challenges for both Family Assistance and Appeals and Hearings.

#### **B. Impact of EBMS Transition on SNAP Application and Appeals Processing**

For application processing, DHS's transition to EBMS and One DHS took place from June 2023 to January 2024. During the transition, Family Assistance staff experienced a period of lower efficiency while the entire eligibility process was being converted. Staff needed to be trained on and practice with the new platform, which took time away from their typical job duties, such as conducting interviews and verifying household information. From June 2023 to December 2023, staff were required to work from both the legacy software platform and EBMS to process cases.

Additionally, staff were required to work from two document retention systems, a legacy system called FARAS and a new system called Box. These efficiency issues were compounded by the fact that the new system and portal enabled households to submit multiple applications while the initial application was still pending, with each needing to be reviewed by staff. This greatly impacted Family Assistance's ability to make timely eligibility determinations during the transition and led to a backlog in the months that followed the completion of the transition.

For appeals processing, DHS's transition to EBMS occurred entirely in June 2023 and led to a dramatic increase in SNAP appeals. The number of appeals quadrupled in the months following the rollout of EBMS. This influx overwhelmed the Appeals Division's capacity to hear and resolve all SNAP appeals within 60 days. The number of SNAP appeals filed was greater than the total number of fair hearing slots available on DHS's dockets. In some cases, this forced the Appeals Division to schedule fair hearings more than 60 days after an appeal was filed, creating a backlog of untimely SNAP appeals.

### **III. Corrective Actions by Family Assistance**

Following the statewide rollout of EBMS, Family Assistance determined that intensive, coordinated efforts were necessary to address the slowdown in application processing and the resulting backlog of applications. The corrective actions taken had the desired effect, with the 30-day timeliness rate increasing from 11% in January 2024 to 96% by August 2024. The 30-day timeliness rate has remained above 95% since August 2024.

Family Assistance initially responded by holding daily meetings involving the Deputy Commissioner, Assistant Commissioner, Directors of Operations, and Field Management Directors to discuss workload management, report on progress, and address any roadblocks in the processing of applications. To mitigate the increased workload and reduced productivity caused

by staff operating in both the legacy system and EBMS simultaneously, Family Assistance prioritized the proper registration of all applications in EBMS and developed a manual process to track daily assignment goals and ensure they were achieved. It also crafted a plan to improve application processing times and move towards the elimination of the application backlog. This plan was known as the 90-Day Get Well Plan.

#### **A. 90-Day Get Well Plans**

Family Assistance launched the 90-Day Get Well Plan in January 2024. The plan was timed, in part, to begin after the legacy system was decommissioned on December 31, 2023, enabling staff to fully focus on processing applications in EBMS. To accomplish its objectives, the Get Well Plan prioritized completing application interviews, resolving defects in the EBMS system, and implementing improved communication methods with SNAP customers.

As an initial step in prioritizing interviews, Family Assistance obtained approval from the USDA in December 2023 to authorize contract staff to perform clerical work. This approval allowed Family Assistance staff to focus on conducting interviews. Family Assistance also approved overtime pay for staff. Then, from January 22 to January 26, 2024, Family Assistance utilized nearly all personnel and resources to conduct interviews. In addition to scheduling interviews, Family Assistance contracted with Deloitte, the third-party vendor who developed and oversaw the launch of EBMS, to provide comprehensive support services. Throughout the 90 days of the Get Well Plan, Family Assistance implemented and monitored weekly processing goals and enhanced its communication with frontline staff.

Family Assistance's Deputy Commissioner, Assistant Commissioner, Director of Operations, and Field Management Directors met daily with Deloitte's EMBS team to address defects in EBMS identified through trend metrics or raised by Eligibility Counselors and SNAP customers. Between January and March 2024, Deloitte implemented numerous changes to EBMS

to enhance functionality and streamline processes.

As part of the Get Well Plan, Family Assistance launched proactive communication efforts to remind applicants of their interview times via text messages and phone calls. DHS also collaborated with wireless carriers to ensure that its phone numbers were not flagged as spam, thereby helping calls reach customers successfully. After DHS rolled out these reminders, the interview no-show rate dropped from 51% to 23%.

The Get Well Plan proved successful, resulting in a “steady state” in which Family Assistance had sufficient resources to process the volume of incoming applications. The State APT rate increased from 7% in January 2024 to 37% in March 2024. Over its 90 days, the Get Well Plan reduced the number of pending application registrations from 19,159 to 43, pending interviews from 58,000 to 2,000, pending untimely applications from 49,113 to 1,500, and pending recertifications from 23,354 to 4,450. Additionally, the number of daily dispositions increased from 2,147 to 4,224.

Following the success of the initial 90-Day Get Well Plan, Family Assistance implemented a second 90-Day Get Well Plan focused on case maintenance tasks. To support this effort, Family Assistance developed workload management reports to assist frontline management in monitoring application progress and implemented quality checks within the system to enhance benefit accuracy. These changes reduced open tasks by 43%, and by June 2024, DHS increased the State APT rate to 85%.

## **B. Process and Program Changes**

### **1. Broad-Based Categorical Eligibility**

In the Fall of 2023, DHS started work on a rule to implement Broad-Based Categorical Eligibility (“BBCE”). BBCE is an optional policy that states may implement, under which households become categorically eligible for SNAP because they qualify for a non-cash

Temporary Assistance for Needy Families (“TANF”) benefit. BBCE benefits both the customer and the state agency by eliminating the need to verify certain information, thus speeding up application processing. DHS filed the rule on October 2, 2025, and it is currently proceeding through the notice-and-comment rulemaking process.<sup>20</sup>

## **2. Workload Management**

Beginning in March of 2024, Family Assistance developed and implemented a process to monitor three application timeliness metrics in an effort to prevent the emergence of new backlogs. Family Assistance also developed corrective actions to immediately take if any of the metrics exceeded a certain threshold. The process was a success, and Family Assistance memorialized it in March 2025 as Policy 24.30 SNAP Workload Management.

The first metric is the number of applications pending registration. If this number exceeds 100 for five consecutive business days, Field Management Directors will increase the task assignments per worker.

The second metric is the number of applications pending disposition. If this number exceeds 32,000 for five consecutive business days, Field Management Directors will increase task assignments per worker, require supervisors to process applications, or authorize overtime. In addition, Family Assistance’s Assistant Commissioner will notify the Commissioner and Executive Leadership Team and provide a daily status update. To monitor the effectiveness of the corrective actions, the Director of Operations will schedule twice-daily meetings to review

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<sup>20</sup> Although the rulemaking process is underway, certain steps in the process could prevent the current rule language from being finalized. DHS may receive public comments that require alteration or withdrawal of the rule. Similarly, review by the Joint Government Operations Committee of the Tennessee General Assembly or changes in federal law could require the same. DHS became aware on November 19, 2025, of a draft FNS regulation, Regulation Identifier Number (“RIN”) 0584-AF10, being evaluated Office of Information and Regulatory Affairs that could alter the availability of the BBCE option to states. To DHS’s knowledge, the text of the draft has not yet been released through a Notice of Proposed Rulemaking.

progress and address any barriers to reducing pending applications below the threshold.

The third metric is the number of interviews scheduled more than four business days after the filing of an expedited application. If expedited interviews are scheduled beyond the fourth business day for more than two consecutive business days, the Director of Operations will notify field management staff to add more appointment slots per worker.

### **3. On-demand Interviews**

Family Assistance launched an on-demand interview pilot in July 2024. The pilot allowed customers who called DHS, either after missing or wishing to reschedule their recertification interview, to complete the interview immediately during the call. The pilot was successful, and in November 2024, Family Assistance expanded the on-demand interview process to include initial applicants. Approximately 75 employees currently support the process. From July 2024 through August 2025, Family Assistance completed more than 84,000 on-demand interviews.

### **4. Elderly Simplified Application Project**

The Elderly Simplified Application Project (“ESAP”) extends certification periods for elderly and disabled customers who have no earned income and do not receive TANF. The implementation of ESAP has benefited this vulnerable population by simplifying the recertification process, while also reducing administrative burdens and allowing staff to focus more time on processing non-ESAP applications.

### **C. Personnel Changes**

In October 2023, DHS created a new strategy to address Family Assistance staff vacancy rates, retention rates, and training needs. In December 2023, DHS took further staffing measures to address the backlog of pending applications. Staff from divisions other than Family Assistance were temporarily reassigned to conduct eligibility interviews and assist with case processing. DHS also contracted with an external vendor to provide additional staffing to help customers with

general inquiries, enabling DHS staff to focus on eligibility-related tasks.

These staffing efforts bore fruit, as vacancies were reduced by 87% between 2023 and 2025, and turnover rates decreased from 24.13% in 2023 to just 5.64% in 2025.

To address the high number of vacancies, DHS prioritized hiring new staff. Weekly “Office Hours” meetings were established with Family Assistance managers to address vacancies and improve hiring, onboarding, and recruitment practices. Family Assistance changed its processes to allow Eligibility Assistants to be promoted to Eligibility Counselors in two years instead of the previous four. DHS made additional outreach efforts, including hosting virtual job fairs, expanding recruitment, and increasing the advertising of open positions. DHS also used emergency postings during state hiring freezes to maintain hiring momentum. These initiatives significantly reduced the time required to fill open positions.

At the same time, DHS implemented retention strategies. It held office roadshows and made cultural improvements aimed at increasing employee engagement, including team-building exercises, training summits, an Individual Contributors Conference, a OneDHS Leadership Conference, and an engagement survey.

DHS also focused on enhancing training for both new and existing staff. Through revised training processes, the time required to train new hires was reduced from thirteen weeks to six. DHS also emphasized in-person coaching to support the professional development of new hires. Additionally, hiring managers received training on efficiently reviewing resumes to manage the increased applicant pool resulting from DHS’s hiring outreach efforts. DHS also streamlined the resolution of disciplinary actions, enabling faster responses to behavior or performance concerns.

While addressing vacancies, retention, and training, Family Assistance also approved daily and weekend overtime to increase staff capacity to process initial and recertification applications.

Additional personnel were also added from the Family Assistance Service Center to expand capacity for processing recertification applications.

#### **D. Technology Changes**

##### **1. Application Status Clarity**

In March 2024, DHS updated the OneDHS portal to provide customers with more detailed information on the status of their applications. The updates included revised status descriptions and the addition of tool tips to improve customer understanding. For example, instead of a generic status like “In Progress,” the portal would now display more detailed information, such as “Pending Interview - Appointment scheduled.” These changes not only made the portal more customer-friendly but also helped reduce call center wait times.

##### **2. Self-scheduled Interviews**

In the spring of 2024, Family Assistance began developing an enhancement to EBMS to allow applicants to schedule their eligibility interviews when applying through the OneDHS portal. Previously, customers who submitted applications online were not able to select the time and date of their interview appointments. This enhancement, developed and tested over several months by DHS and Deloitte, went live in March 2025 and proved successful, with DHS conducting over 30,000 self-scheduled interviews in the first month and a half after its launch. The reduction in missed interviews contributed to faster application processing times.

##### **3. Automated Indexing of Verification Documents and Verification Navigator**

DHS took additional steps to streamline the application process and improve customer communication by deploying an automated indexing feature for verification documents submitted by customers. These changes went live in June 2025. The OneDHS portal Verification Navigator also now identifies the specific documents required to process a customer’s pending application

and provides a particular location to upload each document. This new functionality made the document verification process more efficient for both customers and DHS staff. DHS implemented the change to increase the number of applications submitted with all verification documents and reduce the number of incorrectly submitted verification documents. It also sought to enable Eligibility Counselors to more quickly identify when an application was ready for processing.

#### **IV. Corrective Actions by Appeals and Hearings**

After the implementation of numerous corrective actions over a year and a half period, DHS became timely by ensuring that appeals filed on or after February 3, 2025, are processed within the timeframe required by regulation. Appeals and Hearings has maintained its timeliness since that date.

##### **A. Volume Management Plan**

In May 2024, Appeals and Hearings created its Volume Management Plan, a process by which it monitors the number of appeals processed each day and, in the event the number of appeals spikes, initiates measures to ensure that appeals are processed and set for hearing in a timely fashion. This process was later formalized in February and March 2025 as DHS Policy 7.11 – Family Assistance Appeal Volume Management and Supporting Document 07.03-25.02 – Family Assistance Appeal Volume Management Plan.

Under the Volume Management Plan, certain steps are taken when the volume of appeals filed on a single day exceeds 150.<sup>21</sup> As a first step, the plan requires the Appeals and Hearings Assistant Commissioner, the Director of Operations, and the various Appeals and Hearings units to be notified of the volume increase. It then requires frequent communication between the Appeals

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<sup>21</sup> The Volume Management Plan was activated for the first time in November 2025 after becoming a formal policy in February and March 2025. The plan remained active for two days due to an influx of appeals related to the federal government shutdown. It enabled Appeals and Hearings to successfully monitor and address the influx.

and Hearings units to ensure that timely decision-making regarding resource allocation and other support needs is made.

If necessary to maintain timeliness, modifications to internal processes are taken as needed. Staff from units with additional capacity can assist units that have bottlenecks. Existing dockets with open space can be reallocated, and new dockets can be created. Additionally, staff can be reallocated to high-volume hearing locations to allow for more dockets in those locations.

## **B. Process Changes**

### **1. Resolution Unit**

Before May 2024, a Conciliation Unit was responsible for conducting initial reviews of all appeals, registering the appeals, and engaging in prehearing conciliation with the appellants. The volume of appeals filed between June 2023 and May 2024 was so high that the Conciliation Unit only had the capacity to conduct the initial reviews and register appeals. It was unable to engage in the conciliation process due to time and resource constraints.

In May 2024, Appeals and Hearings identified a proactive strategy to help reduce the appeals backlog. It created a pilot team, the Resolution Unit, that reached out to appellants and attempted to resolve cases before their scheduled hearing dates. The Resolution Unit was created to engage appellants in discussions about their appeals, answer questions related to the SNAP application or recertification process, and, when appropriate, facilitate resolutions in favor of appellants.

The Resolution Unit was a resounding success and transitioned from a pilot to a permanent team in August 2024. As an example of its impact, the Resolution Unit successfully resolved 38% of the approximately 1,500 cases assigned to the unit in February 2025.

### **2. Surge Support**

In June 2024, Family Assistance, in collaboration with Appeals and Hearings, established

a Surge Support team to correct case errors during the appeals process. Appeals and Hearings staff proactively review cases for potential errors and, if any are found, submit a request to the Surge Support team for further review. If an error is confirmed, Surge Support staff will take corrective action on the case.

Once corrective action is taken, Surge Support staff report the resolution back to Appeals and Hearings staff, who then contact the Appellant to explain the resolution. If the appellant is satisfied with the correction, they are given the option to withdraw their appeal request.

### **3. Non-linear Case Processing**

In March 2024, Appeals and Hearings identified a bottleneck in the appeals processing method used by EBMS and began discussing how to resolve the issue. When originally developed, EBMS required an appeal to proceed through each step of the process in a linear fashion. The appeal had to first be registered, then assigned to the Conciliation Unit or Resolution Unit for attempted conciliation, and, only after a failed conciliation, could an appeal hearing be scheduled.

In December 2024, Appeals and Hearings implemented both a process change and a system change to allow certain appeals to bypass the Resolution Unit and proceed directly to hearing when resolution appeared unlikely. This change gave Appeals and Hearings staff an additional option to ensure cases were processed efficiently. As a result, cases likely to proceed to hearing moved more quickly through the appeals process and were more likely to be timely heard.

In February 2025, Appeals and Hearings instituted a non-linear processing method in EBMS. Its implementation was the culmination of the planning and efforts that began in March 2024. With this method, an appeal is registered and immediately scheduled for a hearing within 50 days of the filing date. If appropriate, the Resolution Team engages in conciliation efforts. If no resolution is reached, the appellant proceeds to the already scheduled hearing.

#### **4. Increasing Docket Numbers and Size**

Starting in the summer and fall of 2024, Appeals and Hearings reallocated resources to increase both the number of dockets available and the number of appeals placed on in-person and telephonic dockets. To provide additional capacity on high-volume days, supervising Senior Administrative Judges also conducted SNAP hearings.

### **C. Personnel Changes**

#### **1. Restructuring of the Appeals and Hearings Division**

In January 2024, Appeals and Hearings began a restructuring that it implemented over the following eight months. Appeals and Hearings determined it could operate more efficiently by refining job duties, reallocating resources, and identifying opportunities for staff to perform high-value functions. Each Unit, along with the appeals process itself, was carefully analyzed to determine the optimal distribution of staff needed to process appeals efficiently.

The restructuring involved assessing current staff, aligning skills with job duties, collaborating with the Department of Human Resources (a different state agency) to formalize new job classifications, and requiring existing staff to reapply for the reclassified positions. Appeals and Hearings completed its restructuring in August 2024.

As part of the restructuring, Appeals and Hearings added one Appeals Coordinator position and one DHS Administrative Judge position. These new positions increased the number of appeals that could be heard daily. Additionally, several new job classifications were established from existing positions, including: Appeals Analyst, Appeals Generalist, Appeals Coordinator, Customer Service Representative, Office Supervisor, and Appeals Director. These classifications helped balance workflow and reduce bottlenecks at various stages of the appeal process.

The formal establishment of the Resolution Unit, discussed in greater detail above, was also a direct outcome of the restructuring. This addition gave Appeals and Hearings the capacity

to proactively resolve certain cases prior to hearing.

## **2. Registration Process**

In February 2024, Appeals and Hearings identified and resolved an internal process bottleneck that contributed to delays in the appeals process, the registration of appeals. Registration involves logging the appeal, assigning it to appropriate staff, ensuring the continuation of benefits if the customer is eligible, and assigning certain tasks related to the appeal. To address the bottleneck, Appeals and Hearings reallocated staff to assist with the registration process. This change increased the number of appeals registered and allowed cases to move more efficiently through the appeals process. A dedicated unit, the Intake and Registration Unit, was later established as part of the division's restructuring described above.

## **D. Technology Changes**

Several contributing factors to appeal delays involved technological issues within the new platform, EBMS, and the OneDHS portal. In response, DHS began developing system updates to address these issues and improve overall functionality.

### **1. Ensuring that Only One Appeal is Filed Per Issue**

The first of these updates went live in September 2023. Previously, customers could file multiple appeals for the same issue. The update introduced a prompt for customers attempting to file an appeal on an issue that already had a pending appeal. The prompt displayed a message reading: "You have previously submitted an appeal for this case. Do you want to file another appeal?"

### **2. Early Appeals, Mistaken Appeals, and Categorization of Appeals**

In October 2023, DHS implemented a second system update to address several issues that were unnecessarily consuming Appeals and Hearings' staff time. One issue involved customers filing appeals before an eligibility determination had been made. To address this, a message was

added to the appeals section of the OneDHS portal informing customers about the typical processing time for SNAP applications.

Another issue arose from customers who mistakenly filed appeals when they meant to apply for benefits. This confusion was due to the proximity of the “Appeals” tile to the “Apply” tile on the OneDHS portal. A redesign of the portal landing page remedied this issue for customers. Additionally, a new screen was added to the appeal process that allowed customers to select the basis for their appeal and provided plain language examples (e.g., “The amount of my benefits has decreased”). This change clarified that the customer was filing an appeal rather than an application. And for cases where an appeal was intended, the change reduced the time needed for Appeals and Hearings staff to determine the issue in the case.

In June 2025, as part of its appeals volume monitoring, Appeals and Hearings noticed an increase in the number of appeals filed by customers. After investigating, it found that many customers were mistakenly filing SNAP appeals when they intended to appeal decisions related to a separate program, the Tennessee Summer Nutrition Initiative (“TSNI”). To resolve the issue, Appeals and Hearings updated the OneDHS portal to direct customers to a dedicated web form specifically created for TSNI appeals. This situation highlighted the effectiveness of the Volume Management Plan implemented by Appeals and Hearings and its ability to ensure that appeals are processed timely.

## **V. Treating Late-Filed Appeals as Requests for Restoration of Benefits**

Before the filing of this lawsuit, DHS had Policy 24.22, which sets out a process that complies with the regulation governing the restoration of lost benefits, 7 C.F.R. § 273.17. However, DHS was unaware that a separate regulation related to fair hearings, 7 C.F.R. § 273.15(j)(1)(i), required it to treat certain late-filed appeals – those submitted more than 90 days but less than a

year after an adverse action – as requests for restoration of lost benefits. DHS became aware of this requirement on January 9, 2025, when the lawsuit was filed.

After learning of the late-filed appeal requirement, DHS immediately began corrective action. From January to February 2025, multiple DHS divisions worked together to develop a policy for treating late-filed appeals as requests for restoration of lost benefits. DHS also developed the procedures necessary to carry out the new policy. This collaborative process resulted in DHS becoming compliant with 7 C.F.R. § 273.15(j)(1)(i) on March 1, 2025, through the publishing and implementation of three DHS policy documents.

DHS Policy 7.12 - Requests for Restoration of Lost SNAP Benefits Received Through Untimely Hearing Requests, took effect on March 1, 2025. Under Policy 7.12, Appeals and Hearings staff must identify all untimely filed hearing requests that are still within one year of the underlying adverse action. Once identified, Appeals and Hearings forwards the untimely hearing request to Family Assistance to be reviewed as a request for restoration of lost benefits. At the same time, Appeals and Hearings staff issue a letter to the customer explaining that their hearing request was not filed on time and will not be accepted. The letter also informs the customer that a referral will be sent to Family Assistance staff to review the request for possible restoration of lost benefits. Supporting Document 07.03-25.01 - SNAP Restoration Flow Chart, effective March 1, 2025, provides a visual representation to DHS staff of the steps in the process.

DHS Process Update Notification 24.02-25.02 - SNAP Restoration Requests, took effect on February 28, 2025. The Process Update Notification provides Family Assistance staff guidance on the process for reviewing a case for potential restoration of SNAP benefits when a customer files an untimely appeal. The review is conducted in accordance with DHS Policy 24.22 - SNAP Claims and Issuances, which explains the standard process for the restoration of lost benefits under

7 C.F.R. § 273.17. If the review shows the customer is eligible for restoration of benefits, Family Assistance staff must update the case and manually issue the correct SNAP benefits for the affected months. After the review, a notice is sent to the customer whether the request is approved or denied. The notice provides the decision made by Family Assistance, lists the months and benefit amounts restored (if approved), the reason denied (if denied), and instructions on how to file an appeal if the customer disagrees with the decision.

Between February 2025 and October 2025, 141 late-filed appeals have been filed by customers and treated as requests for restoration of benefits.

## Glossary

<b>Term / Acronym</b>	<b>Definition / Meaning</b>
90-Day Get Well Plan	A plan launched by Family Assistance to address slowdowns and backlogs in SNAP application processing, focused on interviews, resolving system defects, and improving communication with customers.
ABAWD	Able-Bodied Adult Without Dependents. An ABAWD is an individual subject to additional work requirements in order to receive SNAP benefits. ABAWD requirements apply if they are between the ages of 18 and 64, considered physically and mentally able to work, and not living with a child under the age of 14.
Accenture	Current contractor for DHS customer service telephony services.
Administrative Judge	Official who conducts SNAP fair hearings for appellants, either in person or telephonically.
Appeals and Hearings Division	The division within DHS handling SNAP appeals, including appeal processing, conducting hearings, and issuing dispositions.
Appeal Volume Management Plan	A process by which DHS monitors the number of appeals processed daily, activating additional measures if volumes spike to ensure timely processing.
Appeals Coordinator	A staff position within Appeals and Hearings responsible for managing appeal scheduling and other tasks.
Appeals Generalist	A staff position within Appeals and Hearings, established as a new job classification to assist with appeals processing.
Application Processing Timeliness Rate (APT)	The rate at which DHS processes SNAP applications within federally mandated timeframes.
Batch File	An automated file comprised of large amounts of data gathered by EBMS based upon a set of commands or scripts.
BBCE (Broad-Based Categorical Eligibility)	An optional policy permitting categorical SNAP eligibility for households qualifying for non-cash TANF benefits.
CardPro	The FIS-contracted vendor in charge of physically mailing SNAP EBT cards through first-class mail from its facilities.
Deloitte	The third-party vendor that developed and supports the EBMS system; also involved in implementing various DHS system changes.
DHS (Department of Human Services)	The state agency administering SNAP in Tennessee; responsible for the application process, issuance of benefits, and holding fair hearings.
EBT (Electronic Benefit Transfer) Card	A debit-like card that SNAP recipients use to access benefits.

Term / Acronym	Definition / Meaning
EbtInsight	The FIS system used by DHS to collect information on EBT card issuance dates, activations, and transactions.
EBMS (Electronic Benefits Management System)	The modern software platform adopted by Tennessee DHS to integrate SNAP application and appeals processing and customer portal functionality.
Elderly Simplified Application Project (ESAP)	A project that extends certification periods and simplifies recertification processes for certain elderly or disabled SNAP customers.
Family Assistance Division	The DHS division responsible for administering SNAP.
FCS (Family and Children's Services)	Organization contacted by DHS for potential focus group field testing regarding SNAP notices.
FIS (Fidelity National Information Services, Inc.)	Current contractor for EBT card services.
FRC (Fiscal Review Committee)	A statutory oversight committee of the Tennessee legislature comprised of 7 senators and 7 representatives. The role of FRC is to conduct a continuing review of such items as revenue collections, budget requests, the recommended executive budget, appropriations, work programs, allotments, reserves, impoundments, the state debt, and the condition of the various state funds. FRC must review most state contracts and grants, depending on the amount and length of term.
FNS (Food and Nutrition Service)	The agency within USDA responsible for federal SNAP administration and oversight.
FormStack	Online form tool used by DHS. FormStack is a fillable online form used for filing appeals and various other tasks, both internal and external to DHS.
Go Live	A term commonly used in technology to indicate that all design, development, and testing stages are complete and the system is fully operational for users.
IMB (Intelligent Mail Barcode)	A barcode system proposed to be added to SNAP EBT card mailings to enable tracking and reporting of actual delivery dates.
Intake and Registration Unit	The dedicated Appeals and Hearings unit established to improve efficiency by handling registration of appeals.
KPMG	Current UAT contractor for DHS's SNAP-related system changes.
LOE (Level of Effort)	A level of effort is an estimate prepared by technology vendors to estimate cost, resources, hours, complexity, and feasibility of a requested change to a system.
Notice of Adverse Action	Notification to SNAP applicants/recipients of a DHS decision affecting benefits, which also informs of hearing rights.

Term / Acronym	Definition / Meaning
Notice of Decision	Notice provided to applicants/recipients outlining the reasons for an adverse action on their SNAP benefits.
Notice of Delay	Notice provided to applicants/recipients indicating their SNAP application status is pending.
Notice of Hearing	Notice to appellants detailing the scheduled time, place, and method of their appeal hearing, including instructions for requesting a different hearing format.
Notice of Missed Interview	Notice explaining how a SNAP applicant/recipient can reschedule their interview when missed.
Notice of Pending Status	Notice that indicates application processing is ongoing.
OneDHS Customer Portal	The online platform for applicants and recipients to submit SNAP applications, appeals, documents, and view notices. It contains a customer dashboard with appointment times, application statuses, and pending verifications.
Operational Readiness	A process that ensures all environments, data conditions, deployment procedures, and communication materials are fully prepared
Overpayment Demand Letter	Written notice sent to SNAP recipients informing them of overpayments and their right to appeal.
Plaintiffs	The eight individuals and one non-profit who initiated the lawsuit against Tennessee DHS.
PILO (Public Information and Legislative Office)	Office within DHS responsible for stakeholder and public communications, legislative activities, media inquiries, and large-scale internal communications for DHS.
QC Rate (Quality Control Rate)	Refers to the rate or result of federal quality control reviews of SNAP case processing accuracy.
Readability Analysis	An analysis measuring the grade level of written text, clarity of the text, and overall comprehension parameters of the text.
Recertification	The periodic process by which current SNAP households must re-establish eligibility, typically at set intervals.
RLB (Restoration of Lost Benefits)	A process by which benefits are restored to SNAP recipients under certain circumstances, such as when a late appeal is filed within the allowed period.
Resolution Unit	Appeals and Hearings team tasked with proactively contacting appellants and seeking to resolve cases before hearings.
SNAP (Supplemental Nutrition Assistance Program)	A federal program providing food-purchasing assistance to low-income households, commonly known as food stamps.
Special Master	Court-appointed party responsible for overseeing, facilitating, and

Term / Acronym	Definition / Meaning
	reporting on remedial plan implementation in this litigation.
STS (Strategic Technology Solutions)	A division of the Tennessee Department of Finance & Administration assisting in technical/IT aspects of DHS system modifications.
System Integration Testing (SIT)	The testing phase ensuring new system changes work correctly within the broader integrated IT environment.
TANF (Temporary Assistance for Needy Families)	A federal assistance program for low-income families, used as a basis for BBCE eligibility for SNAP.
TSNI (Tennessee Summer Nutrition Initiative)	An initiative held in summer 2025 that provided a one-time cash assistance payment directly to families in need across 15 economically distressed counties.
UAT (User Acceptance Testing)	A testing phase where system changes are validated by users in real-world case scenarios prior to full deployment.
USDA (United States Department of Agriculture)	The federal department supervising SNAP through its Food and Nutrition Service (FNS).