

Probation

delayed and capped

- Longer payout delay
- Monthly volume cap set from stated size and stock
- Early field visit

Trafficking stores often show high volume soon after authorization, so probation covers the riskiest period.

- ▼ clean history: to Normal
- ▼ score spikes: to Elevated or High risk

low risk
high risk

Normal

standard settlement

- Standard settlement time
- Score keeps updating every month

WHO DECIDES
Software: the monthly score

▼ score crosses tier threshold ▲ score falls, history clean

Elevated

delayed and capped

- Longer settlement delay and a volume cap
- Warning letter: prices sit well above peers

WHO DECIDES
Software, no investigator time

▼ score crosses high threshold ▲ review clears, hold released

High risk

partly held

- Part of payouts held pending review
- Hold has a time limit; rolling reserve kept

WHO DECIDES
Software holds; a person reviews

▼ investigation confirms trafficking

Disqualified

stopped

- Permanent for trafficking, 7 CFR 278.6(e)(1)
- Reserve funds recovery; a civil money penalty option exists

WHO DECIDES
Investigator, with notice and appeal

Guardrails: a hold without a time limit and a release path is a penalty without process. Publish appeal timelines, track reversals, and pay interest on wrongful holds. Before disqualifying the last authorized store in an area, run an access test, with a civil money penalty as the alternative.