USDA
United States Department of Agriculture

KEYS TO PAYMENT ACCURACY

Food and Nutrition Service

10 KEYS TO PAYMENT ACCURACY

The Supplemental Nutrition Assistance Program (SNAP) payment accuracy is an ongoing priority for the U.S. Department of Agriculture. Accurate payments provide better customer service to SNAP clients and are important in maintaining Program integrity and external support for the Program. This guidance provides summaries and best practices for what Food and Nutrition Service (FNS) considers the 10 most important "Keys to Payment Accuracy" to assist States in improving and maintaining payment accuracy.

CALL CENTERS

Call centers can assist a State's effort to modernize the administration of SNAP and other human service delivery programs. Provided there is sufficient capacity and staffing, call centers can streamline processes and improve Program access while ensuring payment accuracy—it is a win-win. Learn more about making the most of a new or existing call center.

CASE REVIEWS

One of the most successful tools in attaining and maintaining high payment accuracy is a good case review system. A basic, yet effective way to improve payment accuracy, this guide outlines various ways to approach case reviews to ensure accurate eligibility determination and benefit amount. This strategy allows States to address errors where they happen—at the point of eligibility determination. Read about different approaches to case reviews and why this key is important.

COMMUNICATION

Incorporate good communication throughout all of the 10 keys for maximum effectiveness. Leadership can effectively model strong communication through the sharing of policies and procedures that support payment accuracy. Read this key for more information about how to improve communication with staff and SNAP clients.

CORRECTIVE ACTION PLANS (CAPs)

Corrective action planning is a critical component in reducing improper payments and is a Federal requirement. This key details simple, yet effective, steps to develop a CAP and best practices to consider throughout the CAP lifecycle.

DATA ANALYSIS

The foundation of a strong corrective action plan is good data analysis. Data analysis can provide a thorough understanding of the root cause of errors, including when the error occurred, and, most importantly, *why*. Pay attention to the tips in this key to better understand how to gather, store, and use data.

MODERNIZATION

State modernization efforts can reduce costs and improve customer service. Modernization initiatives can focus on policy or procedural changes, improving technology or engaging with community partners. Efforts such as business process reengineering can improve Program access for SNAP clients while keeping in mind the State's finite resources. Read this key for more information on modernization efforts in SNAP.

ORGANIZATIONAL CULTURE (Leadership)

Commitment to Program integrity must be articulated by all levels within the SNAP organization, from the State Commissioner/Secretary to the eligibility workers. Leaders can set performance goals each year that emphasize the organization's commitment to improving payment accuracy. Read this key to learn more about how support from Top Leadership can motivate the agency's payment accuracy efforts.

POLICY OPTIONS AND WAIVERS

Options and waivers allow States to adapt the administration of the Program to meet the particular needs of their eligible households. It is key to monitor and evaluate the impact of new options or waivers on payment accuracy after implementation and make any necessary adjustments to training or the business process to mitigate their effects on payment accuracy.

STATE SYSTEMS

Because SNAP serves millions of households each month and the Federal requirements are numerous and complex, the quality of a State's eligibility system is instrumental in administering an efficient and cost-effective program. States should heed the opportunity to reduce payment errors by making payment accuracy a primary consideration in new or updated systems. States may find the tips and resources in this key helpful when assessing whether payment accuracy is at the forefront when implementing changes to State systems.

TRAINING

Without proper staff training on systems, policy, and procedures, efforts to improve payment accuracy will be limited. Training can also be utilized as an opportunity to reinforce organizational culture and to better understand the challenges being faced that are impacting payment accuracy. This key shares training techniques and cost-effective resources for States' consideration.

CALL CENTERS

Summary

Call centers, or Customer Contact Centers, can play an integral role in the service delivery models of States seeking to improve Program access and customer service while streamlining processes that may improve payment accuracy. For many States, call centers are a primary component in a State's effort to modernize the administration of SNAP and other human service delivery programs. Call centers can provide a variety of case maintenance and certification functions through Interactive Voice Response (IVR) systems and staff agent assistance. Improving the ease for households to report case changes can have a direct positive impact on payment accuracy.

Why is this Key Important?

Provided sufficient capacity, staffing, and call lines, call centers can address many of the challenges State agencies encounter in SNAP administration:

- Customer Service: Call centers provide alternative methods for receiving program services and accessing customer information. Various case maintenance and certification functions can be received and processed through call center operations, such as general inquiries, case changes, application and recertification interviews and processing. Call centers can reduce major barriers to program access such as a household's lack of transportation, hours of employment, illness or disability, childcare issues, etc. Call centers may even offer customers with 24/7 access to general and case specific information through IVR features, which allow customers to self-serve, often significantly reducing the need to speak to an agent or visit a local office.

- Workload Management: Call centers can reduce the workload of eligibility staff by having contractor (non-State merit employee) personnel responding to certain customer calls related to general program information and other allowable functions that would usually be performed by eligibility staff (see Call Center Policy Guidance below). In addition to the IVR features mentioned above, this allows eligibility staff to devote more time and attention to case processing, which can have a positive impact on payment accuracy.

- Customer Contact: Call centers accessible by a known single telephone number to report household changes or to perform other functions can ensure the customer gets to the correct contact the first time.

Teachable Moments

Determine Call Center Functions

- Call centers can be effective in helping to reduce the workload of eligibility staff. Although State call centers can support a wide range of services and functions, from general program information to application and recertification disposition, States must review their business processes and data to determine the call center functions they

need most. States should also consider required staffing and technology needs, as well as other resources required to support the call center. Failure to complete this process can lead to long call center wait times and other inefficiencies.

Quantity vs Quality

- Call center staff and systems must be able to manage heavy call volumes, and should try to minimize wait and hold times. The quality of the customer contact is important to ensure that customers will typically only need to call once to resolve an issue.

Training

- Call center staff must receive extensive training in both SNAP policy and call center technology to perform their jobs effectively. The State must ensure that they timely notify and train call center staff on changes in SNAP policy and procedures, and on all call center procedures and technology updates.

Call Center Policy Guidance

- Review and share with staff the updated February 2020 call center guidance regarding allowable tasks by non-merit personnel.

Best Practices

- **Documentation:** Documentation in the client's case file is critical. Training call center staff on the importance of documentation is essential for this best practice.

- **IVRs:** Development of intuitive IVRs, which are designed to route people to the correct staff, can reduce call wait times and dropped calls.

- **Technology Adoption:** Consider including text message, online chat and/or email response to the call center's function to reduce excessive wait time and dropped calls.

- **Employee Engagement Activities:** These activities may help improve call center performance through boosting morale, job satisfaction, and fostering group cohesiveness.

- **Continuous Improvement:** Collecting data to develop a comprehensive understanding of the reason customers contact the call center can help to develop a system which maximizes customer self-service.   This can also help the State zero in on common issues, and then Business Process Reengineering or similar efforts can make more systemic improvements.

- **Quality Assurance Unit:** This is a team of call center staff and supervisors responsible for conducting monthly quality and accuracy reviews to ensure consistency among call

center operations and staff performance. It also provides a means for supervisors to address problem areas through staff coaching and mentoring.

- **Scenarios:** The State agency sends out regular emails to staff with real case scenarios and solutions to difficult case problems to ensure consistency in the way situations are addressed. This provides the State agency an opportunity to assess knowledge and to fill in where there are gaps.

- **Call Monitoring:** Regular call monitoring and recording by supervisors allows for additional training opportunities on case processing and customer service.

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CASE REVIEWS

Summary

Case reviews make it possible to gather real-time data to determine the types of errors occurring and their root causes. At a minimum, the data should capture an entire office so comprehensive data analysis can be done to recognize trends. Once trends are identified, the State agency can make needed system changes, issue policy clarifications, and conduct training. Case reviews not only provide vital information for case corrections and problem identification, the data collected can also be used to hold eligibility staff accountable for their work.

Why is this Key Important?

One of the most successful tools in attaining and maintaining high payment accuracy is a good case review system. Many States mandate case reviews because they provide managers and supervisors valuable information on the quality and timeliness of case determinations. Information gathered from case reviews allow States to determine the root causes of errors and identify specific areas for corrective action, such as policy clarification, refresher training, changes in office procedures, improved case record documentation, system changes, etc.

Case Review Types

- **Case Sweeps:** This type of case review can be targeted toward the most error prone cases, such as earned income cases, or it can be a review of most or all cases in the caseload. Sweeps have shown to be effective when there is a high error rate that is not localized to a particular geographic area or particular policy. When conducting a case sweep, all available staff are used to complete the case reviews. Case sweeps ensure a large number of error-prone cases are corrected. In order to maintain the accuracy of these cases, findings identified during the case sweeps process should be analyzed immediately to obtain a clear understanding of the root cause of the errors so corrective actions can be implemented.

- **Peer Reviews:** These reviews allow for eligibility workers within the same unit or office to switch cases for review. Generally, peer reviews are conducted prior to benefit approval or very shortly after benefits have been issued. Peer reviews provide another set of eyes to catch if reported information was missed and therefore not included in the eligibility determination. They also help to reinforce policy knowledge and to find and correct errors in a large number of cases. These reviews may seem less intimidating to an eligibility worker who would prefer to have a co-worker find their mistakes than their supervisor.

- **Supervisory Case Reviews:** These thorough case reviews are conducted by supervisors, prior to certification, who may be required to conduct a minimum number of reviews monthly, using a prescribed procedure. These reviews enable supervisors to track the accuracy and timeliness of benefit issuance and may help to identify staff who need additional support.

- **Third Party Reviews:** The most effective case review systems include a third-party review process, usually a supervisor, after an initial review has been completed. The third party reviewer should not have reviewed the case previously. A third party review ensures that those conducting initial case reviews have an accurate understanding of policy and are spending the time needed to conduct a thorough and accurate review. These re-reviews maintain the integrity and consistency of the review process.

- **New Worker Reviews:** To ensure new employees have a thorough understanding of the Program and benefit determination, immediate supervisors perform reviews of cases completed by new workers prior to approving benefits. These reviews may be ongoing during the first 6 to 12 months of new eligibility workers' employment.

- **Targeted Case Reviews (Focused Accuracy Reviews):** These targeted reviews focus on specific error prone cases and/or elements of the case. They are effective in isolating and correcting specific types of errors within an office or State. These reviews allow for a large number of cases to be reviewed as only one element is being targeted.

Teachable Moment

Quality Control Policy Memo

- SNAP policy requires that individual case reviews for future corrective action planning occur AFTER case results have been transmitted to FNS. For more information on maintaining the integrity of the SNAP quality control system, please see memo 16-02.

Best Practices

- Develop a case review sheet that collects detailed findings and has a standardized process for consistent data collection.

- Implement a system to track error cases to ensure corrections are made timely and accurately.

- Determine the root cause of the error. For example, it is common to assume that because there are a lot of errors occurring related to a particular policy, the workers need to receive refresher training. Before settling on that conclusion, check first to be sure the policy is clearly written, the computer system is properly programmed to handle the policy, and there are no procedures in place that could be causing the errors.

- Once the root cause is discovered, develop and implement corrective actions immediately.

- Conduct a targeted review 6 and 12 months after implementing the corrective action and revise the CAP until the issue is fixed.

- Review the FNS 310 Handbook to better understand the quality control review process.

COMMUNICATION

Summary

Communication is a strong component of success for all the Keys in this guide. Additionally, as new technology and easier access to information transforms the way we do business, it is also important to remember that simple things, such as good communication, have significant value in improving accuracy and ensuring buy-in from all staff.

Why is this Key Important?

It is critical that all State agency staff, from management to eligibility workers, understand not only "how" to access information and process client cases accurately, but also "why" it is important to ensure that accurate SNAP benefits are provided to households. Providing this context is critical for all staff members in order to effectively improve and maintain payment accuracy.

Agency leadership must communicate a clear vision, objectives, and performance expectations to all areas and levels in the organization. When implementing policy or procedural changes, leadership should provide clear direction, as well as context for the change, to impress upon staff the critical need for adopting the changes.

Teachable Moments

Sharing guidance and new policy with staff

- Leadership at various levels must communicate guidance and new policy to staff. This information may be presented in a variety of ways, such as through memos, guidance, video, webinars, trainings, etc. The communication should include not only the "how" a procedure or policy is being changed, but also "why" the change is needed. Consider including messages from the Commissioner or Secretary to emphasize the purpose and their support.

Turning an error into an opportunity to learn

- While mistakes by eligibility staff must be corrected to improve payment accuracy, reducing the likelihood of the mistake reoccurring by turning the correction into an opportunity for all staff to learn from may be a more efficient and effective approach in improving payment accuracy.

Quality vs. Quantity

- Without consistent reinforcement that payment accuracy is a priority, eligibility workers may choose to emphasize speed over accuracy when faced with crowded waiting rooms or stacks of unprocessed cases. Leadership from first and second line

supervisors focusing on and rewarding quality can help eligibility staff to focus on quality as well.

Don't forget about the client

- Simple and direct communication through easily accessible platforms, such as text messaging and mobile apps, may improve a State agency's efforts to improve payment accuracy. Many payment errors could be avoided by providing information to clients that is brief, easily accessed, and clearly written.

Best Practices

- Repetition is necessary when communicating key messages. The more important the message, the more that message should be repeated across different platforms. Examples of possible platforms include agency memos, staff meetings, trainings, intra-agency websites, email, or other communication channels that staff can access.

- Adhere to the bilingual requirements at 7 CFR 273.4(b) to ensure clients fully understand program rules.

- Establish regular trainings to reinforce the agency's mission and current Program policy.

- Maintain an agency-wide newsletter or internal website to highlight key messages on program policy and express appreciation for the staff's role in improving program accuracy.

- Tracking error trends and incorporating that information into meetings and communications at all levels of the agency reinforces payment accuracy as a priority.

- Establish visible ways to recognize offices or teams, which are successful in payment accuracy.

- Look for opportunities for State exchange to learn about other States' strategies to improve payment accuracy.

- For online training opportunities, ensure staff is allotted sufficient time to complete trainings.

- Consider classroom trainings so there are opportunities to ask questions.

- Make trainings and the sharing of information PROACTIVE, not REACTIVE.

CORRECTIVE ACTION PLANS

Summary

Corrective action planning is one of the most critical components for successfully reducing improper payments. State and local agencies analyze problems through corrective action planning and then develop initiatives to reduce or eliminate the impact of these problems on program operations and customer service. Documenting and sharing the corrective action plan (CAP) confirms the agency's commitment to improved payment accuracy and high quality customer service. It also provides opportunities for staff at all levels to participate in improvements.

Why is this Key Important?

Federal regulations at 7 CFR 275.16(b) require State agencies to develop corrective action plans for any of the following circumstances:

- A payment error rate of 6 percent or greater.
- Causes of other errors identified by quality control, including error rates of 1 percent or greater in negative case actions.
- Those found in a FNS review, GAO audit, contract audit, USDA OIG audit or investigation, or a FNS report regarding the implementation of major system changes.
- If 5 percent or more of a State's quality control caseload is coded as incomplete.
- In any circumstance where State agency rules, practices, or procedures result in underissuances, improper denials, improper suspensions, improper terminations, or improper systemic suspension of benefits to eligible households.

A thorough corrective action plan can make a BIG difference in identifying and correcting problems in order to prevent payment errors. While not difficult, it does take time and commitment from leadership and staff. This key outlines the steps to follow in developing a CAP, and ends with a basic template that can be used to draft your plan.

- **Establish an Agency-Wide Commitment to Payment Accuracy**
  Ensure commitment from leadership and all stakeholders in the process before developing your plan. Agencies may wish to consider corrective actions in their strategic or workforce planning process.

- **Create a Holistic Team**
  Develop a holistic team approach to identify and implement corrective actions effectively. The focus for corrective actions is to eliminate any deficiencies in policies, practices, or procedures or systems that contribute to incorrect eligibility determinations, issuance of incorrect benefit allotments, or insufficient documentation of agency decisions. In order to effectively accomplish this objective, different perspectives from your organization should be engaged in the process, such as eligibility workers, supervisors, fraud staff, claims staff, quality control workers, and your technical team for solutions that require system changes.

- **Conduct a Root Cause Data Analysis**
Conduct a root cause analysis to identify the primary factors contributing to payment errors. In conducting the analysis, you can use the error codes in the quality control data to identify policy or procedural factors that are contributing to errors (e.g., income, reporting, etc.) as well as geographic considerations (such as whether errors are concentrated in certain counties or local offices). While quality control data is likely the primary source when conducting root cause analysis, other data may be useful. It is also recommended that a risk assessment is completed after the analysis identifies which factors are contributing to errors. Review each risk and determine the frequency, or how often this factor leads to errors, and the impact, which is if this factor leads to an error, and how much over or under issuance occurs. Inaccurate eligibility determinations and high dollar errors may be more important to address than a factor that occurs frequently, but leads to fewer improper payment dollars.

- **Conduct a Program Analysis**
Use the results of the root cause data analysis, then conduct a program analysis to assess what policies, practices, and procedures led to the root causes. This is your opportunity to apply program and operational knowledge to better interpret the data. This is where a holistic team is most helpful to ensure different perspectives are considered (eligibility, quality control, fraud, claims, customer service, access, and technical).

- **Draft a Corrective Action Plan**
When identifying the corrective actions, it is crucial to describe how the action relates to the results of the root cause/program analysis to address the leading causes of errors. These are the components to include in a draft corrective action plan:

  1. **A thorough description of the deficiency.** Describe what went wrong and why it went wrong. This includes both the error element and the root cause associated with the problem.
  2. **The magnitude of the deficiency**. How many cases were affected? What was the dollar value of the error? Does it affect the entire State? Just one county?
  3. **The data source(s) used** to identify the deficiency and the magnitude, e.g. QC, supervisory reviews, MEs, observations.
  4. **A complete description of the corrective action initiative** developed to resolve the deficiency.
  5. **The tasks, timeframes and person(s) responsible** for the implementation of the corrective action.
  6. **A description of the plan to monitor** implementation of the corrective action.
  7. **A description of the plan to evaluate** the effectiveness of corrective action and the expected outcome.
  8. **The name and title of the person** who has overall responsibility for the CAP.

- **Implement Corrective Actions**
  During the implementation phase, hold regular meetings with leadership and stakeholders while implementing corrective actions to ensure open and transparent communication regarding progress and challenges. Ensure everyone is informed and clear lines of responsibility are established. Be flexible with addressing new challenges as they arise.

- **Validate Corrective Actions**
  Document outcomes from corrective actions. Without the necessary documentation and data, FNS cannot validate that the deficiency has been mitigated. Additionally, please work with your FNS Regional Office and your State partners to help share best practices as you develop evidence regarding how to effectively reduce improper payments.

Teachable Moment

Utilizing staff expertise

- Include eligibility staff, quality control staff, fraud prevention staff, claims staff, supervisors, and technical staff in the corrective action process to ensure that different perspectives are considered. Asking for their assistance in solving a problem helps to ensure a holistic assessment of the root causes and to determine the most effective corrective actions.

Best Practices

- The first step to corrective action planning is detailed data analysis. It is essential to address the root cause(s) of the problem(s).

- When brainstorming corrective action ideas with the group, explore the merits of all new or different ideas.

- Be realistic about the number and scope of corrective action initiatives undertaken at any one time. Focus on a risk management approach, identifying the actions that provide the "biggest bang for the buck."

- Always assign reasonable target completion dates and the person(s) responsible for each step necessary to implement an initiative.

- Develop monitoring and evaluation plans at the same time as the corrective action plan.

- Remember to complete the evaluation step at the end of the trial period for the corrective action to determine if it was successful in reducing or eliminating the targeted error(s).

- A sample CAP template is included. Include a different sheet for each corrective action. .

SNAP CORRECTIVE ACTION PLAN (MODEL)

Agency: Date:

Office(s) and/or Unit(s) implementing this plan:

Description of deficiency, including associated error element and root cause:

Magnitude and geographic extent of deficiency and data sources used:

Complete description of activity developed to resolve deficiency:

Tasks/steps, time frames and person(s) responsible for each task/step:

Description of Task/Step	Person Responsible	Target Completion Date

Description of plan to monitor implementation tasks/steps and time frames:

Description of plan to evaluate effectiveness of activity to resolve deficiency:

Expected outcome: _____ percent reduction in error rate during next months.

As of the date of this plan/update, the status of performing tasks/steps, meeting time frames and effectiveness of initiative to resolve deficiency:

Name and title of person who has overall responsibility for this corrective action:

DATA ANALYSIS

Summary

Data analysis is the process of systematically applying statistical and/or logical techniques to describe, illustrate, condense, recap, and evaluate data. *Data analytics* is the process of examining large data sets to identify patterns, correlations, trends and other useful information. The foundation of a strong corrective action plan is good data analysis.

Why is this Key Important?

At a minimum, data analysis can provide a thorough understanding of the root cause of the error, when during the certification period the error occurred, and who was responsible for the error. This information ensures that the real problem is addressed.

Teachable Moments

Gather data

- Ensure the process of gathering data is standardized, e.g., how applications are received, how eligibility staff process cases, client wait times. This information can provide insight into the causes of errors.

Centralized data

- Data must be stored in one centralized location in order to perform data analytics.

Categories of information to analyze include:

- Error Element: Wages & salaries, shelter costs, vehicles, etc.
- Nature Code: The circumstances surrounding the error.
- Cause: A good starting point for determining what went wrong. Error cause alone is too broad a category to develop meaningful corrective actions as it explains what happened, but not why the error *occurred*.
- When the Error Occurred: Before, at the time or after the most recent action was taken on the case.
- County, Unit and/or Worker responsible for the error: This category can help you to appropriately determine the corrective action strategy.
- How or Where Quality Control (QC) Found the Error: In the case record, through the client interview, or through a collateral source.
- Finding: Overissuance, underissuance, or ineligible.

Error prone profiles

- Consider using error prone profiles to indicate which cases need second party reviews based on common errors found through data analytics. If data is examined to see what types of elements in a case frequently cause errors and a pattern can be found, then cases that have those aspects can be automatically queued for second party review by a supervisor, before benefits are certified.

Asking why

- Identifying the source of the problem is vitally important. Investigating the cause of an error, usually by asking "Why?" several times, must continue until the root cause is identified. For example, here are a few ways that a "policy incorrectly applied" can result in an error:
  - The system is not correctly applying policy
  - The worker does not understand the policy
  - The worker is unfamiliar with using the policy manual to research questions
  - The manual is not up to date
  - The policy is not clearly written
  - The worker did not know the correct person to ask for assistance
  - The worker does not know how to enter codes into the eligibility system
  - The worker did not ask follow-up questions during the interview that would have provided additional information to make a good policy decision

Best Practices

- Take statistically valid samples. Work with your statistician and/or systems staff to ensure the data will accurately reflect what is going on in the cases, in order to make informed decisions.

- Take a step back and consider the big picture when reviewing the data.

- Gather data from all available sources, such as interviews, quality control/SNAPQCS, supervisory case reviews (and other case reviews, e.g., peer reviews, special review team), customer complaints, fair hearings, overpayments, data match hits, MEs, etc.

- Understand how QC codes identified errors in order to better utilize QC coding to quickly analyze where errors are occurring at eligibility.

- Establish regular meetings between QC and policy staff **after** QC cases are sent to FNS to analyze trends on recently submitted QC cases in order to determine corrective actions that will improve payment accuracy on future cases.

- Align the agency's analysis of other data sources with the QC analysis as much as possible. Additional data will provide a larger picture of potential problem areas, and allow for early problem identification.

- Monitor data on a continual basis to look for emerging error trends, target corrective action initiatives, determine the effectiveness of corrective action, and identify the need for specific options/waivers.

- Various reports are available as part of the SNAP Quality Control automated system. States can view the SNAP payment error rates on the USDA Food and Nutrition Service website. In addition, many States have created their own analysis reports.

- Engaging your FNS regional Data Analytics Team (DAT) may also be useful in identifying trends and areas of concern.

- State ME reviews are a critical tool in identifying error prone processes at the local office level. These reviews generally gather a lot of information about errors and why they are happening, which then allows the States an opportunity to determine how to address process or policies that are error prone so that they can avoid costly errors in the future.

MODERNIZATION

Summary

In an effort to reduce costs and improve customer service, State agencies have taken steps to modernize Program operations and systems. SNAP modernization initiatives vary in their scope and complexity depending upon the State. Generally, they can be categorized as follows:

1. **Policy Initiatives**: Streamlining through waivers, options or demonstration projects.
2. **Procedural**: Examining the agencies' business processes for client reported changes, application and recertification actions to identify areas for potential streamlining and process improvement.
3. **Enhanced Technology**: Implementing online applications, document imaging, automated response units, online change reporting, emails, text messages with reminders for application and recertification, chat and instant messaging for client inquiries, and mobile apps which allow the client to perform basic case management tasks including accessing benefit information, case status information and to upload documents, through online client accounts.
4. **Community Partners**: Engaging with community partners, such as food banks, to aid in the application process by providing application assistance, conducting SNAP interviews (with FNS demonstration project approval) and gathering documents.

Why is this Key Important?

Modernization is meant to improve Program access for the recipients while helping States balance the objective to improve Program outcomes, such as payment accuracy, with limited resources.

Teachable Moment

- When pursuing modernization options, the State agency should consider whether they have the needed resources to implement the modernization effort effectively. If not, the State may find the new tool more of a burden than a help.

Best Practices

Modernization best practices are an opportunity for State agencies to improve customer service and payment accuracy by improving communication internally and with the client. When properly implemented, these practices can make it easier for clients and agencies to communicate and can help State agencies process information more quickly and with greater accuracy.

- **Business Process Reengineering (BPR):** Enables the State agency to document, analyze and streamline its business processes and identify issues that cause errors. For example, FNS developed a toolkit to help State agencies evaluate their SNAP notices and make targeted improvements that fit the needs of their clients, work within system constraints, and comply with Federal policy. The toolkit includes model notices with examples of plain language and formatting that State agencies can adapt to fit their own needs. Clear and accurate notices make it easier for the client to understand what they need to provide to the State agency, and this helps improve payment accuracy. Check with your Regional Office about a Notice Project.

- **Integrated Eligibility Systems (IES):** An IES aids eligibility workers efforts to improve payment accuracy due to the comprehensive view it offers of the recipient household. These systems are effective because they reduce the need to have multiple screens open to process a single household application across programs (such as SNAP, Medicaid, or TANF). IES is becoming more common and is especially helpful to States with integrated enrollment of SNAP, Medicaid and/or TANF. Prior to the development and implementation of a new system, States should review the *State Agency Guide for SNAP Eligibility System Upgrades*[1] to ensure there is proper oversight during the system development lifecycle and that Federal requirements are met.

- **Advance Planning Documents (APDs):** It is critical to follow the FNS 901 Handbook which helps State agencies navigate the FNS requirements to secure approval, and get the requested funding, for modern eligibility systems and EBT benefit delivery services. Business owners, including SNAP program staff, should be involved in the development of system requirements and user testing.

- **Data Matches:** When an automated system can effectively handle routine but necessary tasks, workers have less to do manually, freeing up their time to focus on accurate eligibility determinations. Developing systems that automatically conduct data matches and auto populate certain information in the eligibility system can save eligibility workers' time and help them to make accurate determinations the first time without waiting for data to arrive later. In addition, the use of system alerts that inform eligibility workers of a client's change in status through a data match helps reduce errors.

- **Data Mining:** Data analysts identify sources of data to mine in order to generate new information and/or patterns. The *SNAP Fraud Framework*[2] encourages States to use a standard analytic process to help them act upon insights gained from data mining. The Cross-Industry Standard Process for Data Mining (CRISP-DM), as referenced in the Fraud Framework, is a data mining methodology and process model that provides a complete blueprint for conducting an analytics model.

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[1] State agency staff who do not have access to the *State Agency Guide for SNAP Eligibility System Upgrades* should contact their FNS regional office for assistance.
[2] State agency staff who do not have access to the *SNAP Fraud Framework* should contact their FNS Regional Office for assistance.

- **Data Analytics:** This allows the State agency to gather and analyze large amounts of raw data to discover patterns and relationships in order to draw conclusions. It can be conducted to determine any number of things, from common sources of errors, to instances of policy misinterpretation.

- **Document Imaging and Management Systems:** These systems provide for easier access to client documents. Before implementing, a State should consider whether they have the business processes in place to make this efficient. It is also important to develop a standard operating procedure (SOP) to properly attach information to the case, as this is an important component in reducing errors.

- **Mobile Applications and Mobile-Optimized Websites:** Clients may be more likely to have mobile phones than computers, making mobile access a consideration for State agencies as they look to move away from paper-based processes. Mobile applications and/or mobile-optimized websites may allow clients to more easily provide documents, report changes, and view their benefit summaries. Electronic documents may also be easier to track and be received more timely.

- **Text Messaging:** Texts are an efficient way to alert clients of documents due at application and recertification, and also as appointment reminders. Incorporating text messaging into a State's business processes may require a waiver. See the Electronic Notice Waiver and Options memo issued November 3, 2017, for further guidance.

- **SNAP Process and Technology Improvement Grants (PTIG):** These grants support efforts by State agencies and their community-based and faith-based partners to develop and implement projects that focus on improving the quality and efficiency of SNAP operations and processes. See the SNAP PTIG webpage for more information.

- **Identity Authentication:** This State policy option can streamline Program administration and improve customer service by modernizing the most basic integrity measure in SNAP – ensuring the true identify of SNAP recipients. See the Identity Authentication State Option memo released August 21, 2019, for more information.

ORGANIZATIONAL CULTURE (LEADERSHIP)

Summary

The beliefs, ideologies, principles and values of an organization define the workplace culture. The workplace culture may control the way employees behave within the organization, as well as with external customers. A State agency's culture is often a direct reflection of the State agency's leadership and priorities. A healthy culture encourages the State workers to stay motivated and loyal to the agency, its management, and their priorities.

Why is this Key Important?

In order to improve payment accuracy, commitment to excellence must come from all levels within the State agency, from eligibility staff, to the State Commissioner/Secretary. However, for the message of payment accuracy to be embraced by all stakeholders within an organization, the commitment must be emphasized and communicated by **top leadership.**

Teachable Moments

- State agency leadership should articulate performance goals each year and establish performance standards to help achieve these goals.

- Promoting employee engagement and development in the workplace, where eligibility staff earn the recognition and appreciation of leadership, can motivate staff commitment to excellence in priority areas such as payment accuracy.

- Sometimes workplace culture can reinforce negative habits. Use workplace culture to create a positive work environment with good working habits among staff.

Best Practices

- **Top leadership** recognizes and conveys the importance of achieving a low error rate and sets performance goals for the State. A plan to achieve the goals is developed and articulated to staff.

- A performance goal or target is communicated to staff at all levels. Staff throughout the organization should be aware of the payment accuracy target and their role in developing a plan for reaching the goal.

- Eligibility staff is held accountable for the error rate through performance standards. Leadership meets regularly with staff to review error rate trends and supports case review meetings to ensure actions are taken to make corrections going forward.

- Staff is acknowledged and rewarded for payment accuracy improvements.

- **Top leadership** is receptive to and appreciates new ideas for improving program administration from all levels within the State agency.

- Corrective action plans are focused and there is buy-in and understanding of what must be accomplished at all levels. **Top leadership** fully supports corrective action.

- **Top leadership** understands what causes errors that are discovered in quality control reviews.

- **Top leadership** supports and encourages open communication among State agency staff (policy, quality control, training, systems and corrective action) to ensure that error causes are eliminated.

- **Top leadership** prioritizes system changes that are necessary to reduce or eliminate errors.

POLICY OPTIONS AND WAIVERS

Summary

While State agencies must follow the eligibility and procedural requirements of the Food and Nutrition Act of 2008 (the Act) and Federal regulations in administering SNAP, these requirements also include various policy options for States to consider to best serve their participant populations. In addition, States may request to temporarily waive certain requirements to adopt alternative procedures, within certain parameters and limitations.   While states should ultimately exercise state policy options based on their unique state needs and policy goals, proper implementation and training around state policy options is vital to properly preventing payment errors.

Why is this Key Important?

Policy options and waivers allow States to strategically adapt the administration of the Program to meet particular needs of eligible households in their State, streamline administrative and field operations, and coordinate SNAP activities with other programs. It is critical to properly mitigate any risks associated with various policy options or waivers on payment accuracy through well-planned implementation and staff training.

Teachable Moments

- Not all policy options or waivers will have the same effects on payment error rates. It is key to monitor and evaluate the impact of new options or waivers on payment accuracy after implementation and make any necessary adjustments to training or the business process to mitigate their effects on payment accuracy.

- States should carefully consider how adopting a State option may affect the error rate once it's implemented. Bringing in multiple representatives from the organization for a discussion of a State option before adoption or implementation may help avoid unintended consequences. State agencies should also contact their FNS regional offices for clarification on SNAP policy as needed.

Best Practices

- Stay informed on the most current Program information and policy news available to determine which options or waivers may best support your agency's performance goals.

- Speak with other States about lessons learned on options or waivers they have implemented.

- Reach out to the FNS regional office and other States to discuss possible solutions to challenges in your State, and to learn about what options and waivers States agencies are currently using.

- As your agency is considering policy options or waivers, it is essential for all internal stakeholders (policy, quality control, corrective action, systems, field operations, fraud unit, etc.) to debate the merits of the option and weigh how the policy initiative will impact the error rate, program access, and integrity.

- Educate staff and participants on new policy and how it will impact them. Create education materials for State staff and Program participants that are direct and are easy to read.

STATE SYSTEMS

Summary

State agencies are required to develop and maintain automated eligibility systems to administer SNAP. Prior to implementing these systems, States must obtain FNS' approval by showing that the automated eligibility system is designed and programmed to ensure compliance with the Federal requirements for administering SNAP and determining household eligibility. Because SNAP serves millions of households and the Federal requirements are numerous and complex, the quality of State eligibility system automation has been a long-standing priority for both States and FNS. A successful automated SNAP eligibility system results in:

- Consistent, systematic compliance with the Federal laws for administering SNAP and determining household eligibility.
- More effective and efficient programs.
- Improved payment accuracy when key business rules are implemented properly.
- Improved program accountability.

Why is this Key Important?

Eligibility system upgrades and enhancements may be needed to keep up with advancements in technology, changes in business functions, or changes in Federal statutes or regulatory requirements. By prioritizing payment accuracy in new or upgraded systems, States have a huge opportunity to reduce errors.

Teachable Moment

Ensure SNAP is engaged early and often in system development

- New system development should have SNAP experts at the table to ensure payment accuracy is addressed through requirements that reflect SNAP policy (see best practice below). An important tool developed by FNS, the *State Agency Guide for SNAP Eligibility System Upgrades*[3], provides important instruction in system implementation.

Re-emphasizing the priority of payment accuracy

- When States' business models are task driven and a daily performance standard is set, staff may become focused on completing the required tasks, with less attention to payment accuracy. Additionally, to meet daily performance goals, staff may select tasks that are easier to complete and avoid checking interface validations to prevent delays which might extend the timeframe required to complete the case. In order to help emphasize that accuracy is as critically important as timeliness, pull in leadership to re-emphasize the importance of payment accuracy and acknowledge staff who are doing it

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[3] State agency staff who do not have access to the *State Agency Guide for SNAP Eligibility System Upgrades* should contact their FNS regional office for assistance

well. Ensure metrics to monitor performance do not focus exclusively on efficiency, but are balanced and also include measurements of quality.

Understanding the new system

- Training is critical, and "just in time" training is important. While staff should be trained as close to the initial implementation date of the new system as possible to reduce the loss of newly acquired knowledge, it is also important to remember that the new system will be fluid for a number of months while bugs are identified and system fixes are created—unfortunate, but it happens. To ensure staff are using the new system correctly any interim business processes needed should be incorporated into training. Additionally, clear, concise, and accessible guidance should be provided to staff regarding system changes or when workarounds or interim business processes are no longer needed.

Best Practices

- When developing SNAP-related business requirements for the new system, be sure they accurately reflect SNAP policy and are sufficiently detailed.
    - Ensure a requirements traceability matrix (RTM) is created and utilized throughout the eligibility system development lifecycle, so SNAP subject matter experts can validate that all Program requirements make it into the system design, test scripts, and final acceptance criteria. The SNAP System Integrity Review Tool is useful in ensuring that the system has all of the required functionality.
    - Ensure that adequate resources and expertise from SNAP policy and operations are available to support requirements development.
    - Hold internal requirements development sessions with the program, policy, and IT staff.
    - When developing these requirements, review the following items for consideration in the new system:
        - Management evaluation findings that require system changes
        - Waivers
        - Legacy system documents, such as change orders from recent years that should be reflected in the design of the new system

- During the system development stage consider the following activities to ensure payment accuracy is addressed:
    - Ensure a solid testing plan is developed, with attention to the rigor of the testing process, the breadth and detail of the test scenarios, the integrity of the defect ranking criteria, and thorough regression testing. See FNS Handbook 901 Chapter 6, for more on testing.
    - Have robust test cases and include error prone areas in test cases.
    - Make sure the test plan includes data conversion and migration, with clear criteria for success.
    - Ensure that testing is done using converted data, which will help validate the integrity of the data, the conversion process, and the system being tested.

- Confirm that integration with other programs, such as Medicaid, does not compromise SNAP rules, processes, thresholds or other requirements.

- Once the system moves on from development and testing and is ready for the production environment, make sure that all hardware and software defects, as well as program and policy concerns have been addressed.
  - Conduct pilot testing. FNS requires that a pilot of at least three months be conducted, in a live production environment, to ensure that the system operates accurately, and that error-prone functions are identified and addressed before rolling the system out statewide.
  - Put program integrity first. An aggressive project schedule can drive decision makers to accept and implement a system that isn't ready and may jeopardize payment accuracy. Many kinds of defects can be worked out over time, but going into statewide operations with defects in eligibility determination or benefit calculation can create problems that take much longer to recover from than it would take if done right the first time.

- Utilize the *State Agency Guide for SNAP Eligibility System Upgrades*. This guide provides further detail on the best practices outlined above and is intended to assist State agency staff with improved oversight and management throughout the lifecycle of SNAP eligibility system implementation. The guidance also includes tools for States to utilize in the development of business requirements and test scenarios.

- Provide staff with clear guidance on any system workarounds.
  - Post workarounds on an electronic site that is accessible by all staff.
  - Create auto notifications to alert staff when a new workaround is created.
  - Develop a transition process from workaround to system fix, when a workaround is no longer needed.
  - Conduct refresher training when a significant number of defects are fixed, to "level set" and make sure staff is clear on any new functions or procedures.

TRAINING

Summary

All staff, from leadership to eligibility staff, must possess the knowledge and skills needed to provide timely and accurate benefits to those we serve. Ongoing refresher training for veteran staff is as important as thorough training for new employees.

Why is this Key Important?

Insufficient or poor quality training can often be the cause of payment errors. Efforts to improve payment accuracy must include regular trainings for veteran staff as well as strong trainings for new employees. These trainings are a time to emphasize payment accuracy as a priority, provide updates on new policy and procedures, and provide consistent answers to all staff questions. Without regular training opportunities, improving payment accuracy is nearly impossible.

Teachable Moment

- Impart valuable messages to clients and staff more than once and using a variety of different techniques. Learning styles differ so using a multiude of approaches to share information improves the likelihood the essential information will "stick."

Best Practices

Consider the following when developing staff training opportunities:

- **Back to Basics:** This training may provide information on improving interviewing techniques, customer service, integrated eligibility system use, understanding the client perspective, etc.

- **Train-the-Trainer:** This type of training can range from classroom to web-based courses offered to supervisors and/or local training staff to share new training techniques or modules for delivering training to staff. This helps provide consistency in training statewide.

- **Centralized Training Centers:** Staff in centralized training centers are responsible for developing training materials and providing training to all staff in all programs statewide. These centers are generally used for training new eligibility staff as well as refresher training to veteran staff as needed. Centralized training ensures consistency in training.

- **Rotate Staff:** Rotating staff through different assignments allows workers to diversify their skill sets and better understand how each task intersects with payment accuracy. It can also help to increase interest and motivate staff.

- **Training Advisory Teams:** Advisory teams are comprised of representatives from throughout the agency including management, management evaluation, systems, eligibility workers and supervisors, corrective action, and staff development. The

purpose of the team is to provide input from their respective areas to effectively target and prioritize training needs. The teams generally meet quarterly.

- **Regional Training Specialist:** The training specialist travels to local offices to provide training to State staff within their region, for all programs and on statewide issues, as well as, issues and needs specific to their region based on quality control and/or case review findings. Larger States have found this to be cost effective by reducing travel costs.

- **Mini Training Modules:** These are 5-15 minute training modules that can be presented during unit meetings or placed on the State intranet site for all workers to use. The mini-training sessions are generally targeted to error prone policy, procedures or customer service topics. Training staff keep the modules up to date and add new subjects areas, as needed.

- **Huddles:** Using quick "huddles" enables units to have frequent but short briefings to stay informed, review work, make plans, and move ahead rapidly.

  Benefits of "Huddles"
  - They allow fuller participation of front-line staff, who find it difficult to get away for longer meetings.
  - Teams are able to build upon momentum by meeting more frequently.

- **Quarterly Newsletter:** Produce monthly or quarterly newsletters that provide policy updates, payment accuracy tips and best practices, accomplishments, error rate and data analysis information, emerging error trends and new areas of concern identified by management evaluations and/or quality control. Policy quizzes or crossword puzzles with small prizes can motivate staff to feel engaged. Newsletters may be paper copies or electronic.

- **Computer-Based Training or CBT (also known as On-line Refresher Training):** CBT can consist of short quizzes or somewhat longer training modules via the agency website or intranet that automatically check or provide the answers to complex or error prone topics. This type of training can be highly effective in reinforcing skills and knowledge, and can be relatively inexpensive.

  For these trainings to be most effective, time must be allotted for staff to take the trainings. Also, staff should be monitored to confirm they've taken the training. The monitoring may be through the issuance of post-training certification, pre and post testing, etc.

- **Webinars:** These trainings allow for the live voice of the presenter, enable off-site employees to participate, and provide an opportunity for real time questions and answers.

- **Regional Conference Training:** All conferences should be used as an opportunity to provide training including policy updates and clarifications, error reduction strategies,

quality control and error analysis, system updates and refresher training, supervisory training such as how to do a good case review, etc.

- **State Exchange:** State exchange funding is frequently used for State conferences but can also be accessed for one-on-one cross-training opportunities. The best practices promoted during State exchanges should be well established and vetted by FNS.

- **Learning and Development Resources:** The *SNAP Fraud Framework*[4] provides detailed recommendations on implementing successful trainings under the "Learning and Development" section of the guide.

- **Mix and Match:** People learn differently. Use multiple approaches to training and give staff options so they can choose the best approach.

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[4] State agency staff who do not have access to the *SNAP Fraud Framework* should contact their FNS regional office for assistance.