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Enhancing SNAP Quality Control Completion Rates
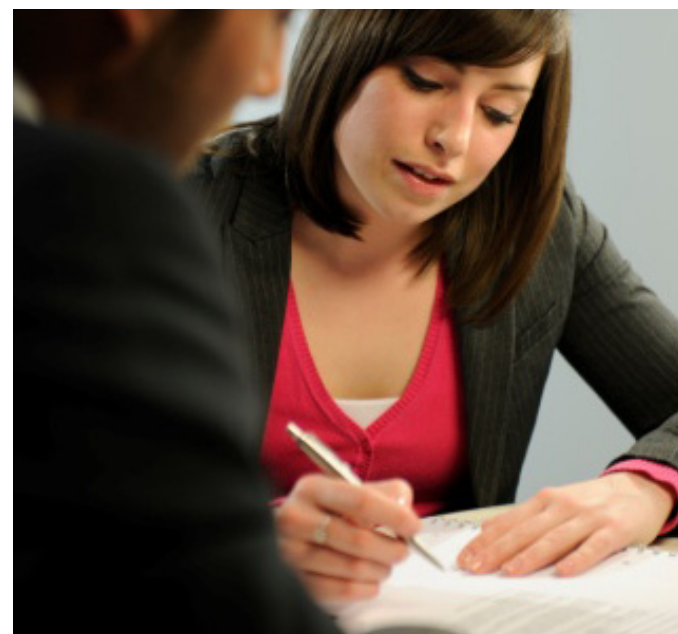
Final Report

Enhancing SNAP Quality Control Completion Rates

Final Report

January 2016

Authors

Brittany McGill
Betsy Thorn
Carole Trippe
Chrystine Tadler
Meg Tucker

Submitted to

Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive
Alexandria, VA 22302

Project Officer

Bob Dalrymple

Submitted by

Insight Policy Research, Inc.
1901 North Moore Street
Suite 1100
Arlington, VA 22209

Executive Project Director

Stéphane Baldi

Suggested Citation

McGill, B., Thorn, B., Trippe, C., Tadler, C., & Tucker, M. (2016). *Enhancing SNAP Quality Control completion rates*. Prepared by Insight Policy Research, Inc., for the Food and Nutrition Service, U.S. Department of Agriculture. Alexandria, VA.

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Executive Summary

The Food and Nutrition Service (FNS) of the U.S. Department of Agriculture developed the Quality Control (QC) process for the Supplemental Nutrition Assistance Program (SNAP) in 1977 to track and measure errors in both eligibility and benefit determination for the program. States conduct monthly reviews of a statistically representative sample of participating households (active cases) and households for whom participation was denied, terminated, or suspended (negative cases). These reviews measure the validity of SNAP cases and ultimately serve as the basis for the SNAP payment error rate. The SNAP QC process also provides FNS with a probability-based national sample that supports research on the SNAP population.

National completion rates for SNAP QC reviews have generally declined since peak levels in the 1980s and State-level completion rates vary widely. The purpose of this study is to examine the factors contributing to incomplete reviews of active cases and to describe best practices associated with high SNAP QC completion rates. Maximizing these completion rates will enable FNS to minimize bias in the QC dataset and most accurately estimate the eligibility and benefit errors made by States.

A. Study Overview

Data collection activities for this study included site visits to 6 States and 2 FNS Regional Offices, online and telephone surveys of the remaining States and Regions, collection of extant administrative data from 5 States, and field re-reviews of 75 incomplete cases from 3 States. Table E.1 outlines the data collection activities associated with each of the five research objectives of the study.

Table E.1. SNAP QC Study Objectives and Data Collection Activities

Study Objective	Data Source
1. Describe the process of conducting a QC review at the State level.	• Site visits to States, including in-depth interviews with State Quality Control Reviewers (known as SQCRs) and QC managers • Survey of State QC managers and reviewers
2. Describe the process of conducting a QC review at the regional level.	• Site visits to Regional Offices, including in-depth interviews with Federal Quality Control Reviewers (FQCRs) and QC managers • Survey of FQCRs
3. Describe the characteristics of incomplete cases as compared to complete cases, and determine the extent to which incomplete cases may bias the data in the QC database.	• Administrative data
4. Determine whether cases are being reviewed and processed correctly.	• QC field re-reviews of incomplete cases
5. Describe the challenges and best practices in the QC review process at the State and Federal levels.	• Site visits to States • Site visits to Regional Offices • Survey of State QC managers and reviewers • Survey of FQCRs

B. Summary of Findings

1. Variation in the State SNAP QC Review Process by State Completion Rate

The State SNAP QC review process is illustrated in figure E.1. Although the general process is consistent across States, the details of each step vary.

Figure E.1. Overview of the State SNAP QC Review Process

QC cases are sampled and assigned to reviewers

SQCR schedules the household interview and prepares for the interview by reviewing case information and checking electronic databases

SQCR collects the necessary information through a household interview and/or collateral contacts. SQCR conducts follow-up with nonresponsive clients as needed

SQCR processes the case, including documenting review process and making error determinations

A second party (or parties) review(s) the case before the review findings are transmitted to FNS through SNAP QCS

Key findings regarding the association between SNAP QC review processes and QC completion rates include the following:[1]

▶ **Household interviews.** QC reviewers in States with high completion rates were more likely to routinely call clients prior to interviews (either to schedule or confirm appointments) and to conduct interviews in clients' homes.

▶ **Nonresponse follow-up strategies.** Reviewers in States with high completion rates made more attempts to contact clients, used various means of contact, and identified creative ways to obtain updated contact information for households. By comparison, State Quality Control Reviewers (SQCRs) in States with low completion rates were more likely to submit a case as incomplete because of failure to cooperate, rather than make additional contact attempts. Similarly, reviewers' efforts to reach collateral contacts were typically greater in States with high completion rates.

▶ **Staff workload.** Overall workloads of SQCRs in site visit States with low completion rates were generally higher than in States with high completion rates; these workloads tended to include other job responsibilities outside of SNAP QC.

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[1] It should be noted that some variations by State completion rate are based on interview data with six States and may not be generalizable to all States.

- **Staff Training.** SQCRs in low completion States were more likely than SQCRs in other States to report their training had decreased or not changed over time. SQCRs in low completion States were also more likely to receive training from a third-party contractor.

2. Federal SNAP QC Reviews of Incomplete Cases

FNS's Regional Offices review all cases that are designated by States as incomplete or not subject to review (NSTR), plus a subsample of active complete and negative cases, to ensure States are reviewing cases and applying policy accurately. The Federal review process consists of a desk review, in contrast to the face-to-face interviews and field work conducted during the State reviews. Although FQCRs are authorized to attempt to complete incomplete cases, such attempts were uncommon. The primary reasons cited were a lack of time and the absence of any requirement to make the attempts. FQCRs rarely formally disagreed with State dispositions of cases as incomplete.

3. Characteristics of Incomplete Cases

Analyses of administrative data from five States suggest the following differences in the characteristics of complete and incomplete cases:[2]

- Incomplete cases are more likely to have earned income and less likely to have unearned income.

- Incomplete cases are more likely to include households with zero income and to receive the maximum benefit level.

- Incomplete cases include more households headed by individuals younger than 25 and fewer households with elderly members.

- Incomplete cases are more likely to be newly certified and to have shorter intervals since the most recent administrative action.

- Incomplete cases are more likely to be in metropolitan areas and less likely to be in micropolitan areas.[3]

4. Field Re-Review Findings

Field interviewers completed 17 percent of cases selected for re-reviews (11 of 64[4]). These cases had been designated as incomplete by the State and Region. The 11 re-reviews were completed despite additional challenges, including lack of access to government databases for verifications, the voluntary nature of client participation (e.g., no penalty for noncooperation), longer interim between the sample month and the time of the re-review than for SQCRs, and the requirement of a signed client release prior to all collateral contacts.

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[2] Because the proportion of incomplete cases is relatively small, however, the effect of these differences on estimates of the characteristics of SNAP cases overall is modest. Effects may be more pronounced for analyses of certain subgroups.

[3] A metropolitan (or urban) area includes a population of 50,000 or more. A micropolitan area includes an urban area with a population of 10,000 to 49,999. All remaining areas are considered rural (U.S. Census, 2013).

[4] Six of the original 75 cases were removed from the re-review caseload because they were under investigation or had been completed since the Federal review. Five cases were reclassified as NSTR because of changes in household circumstances since the time of the SQCR review and were removed from additional analyses.

Among the 11 completed re-reviews, 3 contained payment errors, each the result of overissuance. The case error rate[5] for these cases was 27 percent, and the payment error rate[6] was 13 percent.

Strategies for completing cases. The following strategies were used by field interviewers to successfully complete the cases previously designated as incomplete.

▸ Establishing verbal contact before scheduling and conducting interviews

▸ Greater persistence in contacting clients and use of a wider array of contact methods than those documented by SQCRs, including text messaging, email, and home visits

▸ Conducting interviews in clients' homes

▸ Working directly with collateral contacts to obtain missing documentation (i.e., rather than relying on the client to obtain and provide the documentation)

C. Recommendations for Enhancing SNAP QC Completion Rates

Study results suggested the following recommendations for enhancing SNAP QC completion rates and addressing challenges encountered by State and Federal reviewers.

1. Recommendations for FNS To Enhance SNAP QC Completion Rates

▸ **Expand Federal efforts to complete incomplete cases**, including additional efforts by FQCRs to obtain information from clients or collateral contacts and expanded FQCR access to electronic databases accessed by States.

▸ **Collect additional data on incomplete cases,** including State reporting of information on the demographic, economic, and administrative characteristics of incomplete QC cases based on data in State certification systems. Further research would enhance FNS's understanding of characteristics and patterns of incomplete cases.

2. Recommendations for Addressing Challenges Encountered During SNAP QC Reviews

Obtaining household cooperation. Establishing contact with clients and persuading them to come to scheduled interviews presents a substantial challenge for SQCRs, and many study respondents perceived this difficulty has increased over time.

Recommendations to States

▸ Be persistent and use a variety of contact modes, including text messaging, to increase the likelihood of successfully reaching clients.

▸ Contact clients by phone to schedule and confirm interviews to reduce the likelihood of missed appointments and lost travel time by reviewers.

▸ Consider conducting interviews in clients' homes, in the absence of safety concerns, to reduce the likelihood of missed appointments and increase access to needed documents.

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[5] The number of completed re-reviews with errors divided by the total number of completed re-reviews
[6] The total amount of benefits issued in error divided by the total amount of benefits issued in the re-review cases

▸ Consider conducting more interviews by phone for clients successfully reached by phone to reduce clients' transportation barriers and reviewers' time spent traveling to appointments.

▸ Use home visits to try to reach clients otherwise difficult to locate, in the absence of safety concerns.

▸ Enhance the ability to terminate SNAP benefits within the QC review period for noncooperation to increase the likelihood of completing the QC review before the submission deadline.

Obtaining enough information to complete a review. Missing or unavailable documentation commonly prevented case completion. For example, some study respondents reported having limited or no access to electronic databases that would assist with obtaining information necessary to complete cases. Insufficient understanding of the circumstances in which "likely conclusion" may be used to complete cases also inhibits case completion.

Recommendations to States

▸ Expand efforts to use collateral contacts in the absence of client interviews.

▸ Expand access to The Work Number or other databases of employment and earnings data.

Recommendation to FNS

▸ Provide additional guidance to States on the use of likely conclusion.

Amount of time required to complete cases. Limited time and competing priorities presented challenges to case completion for SQCRs, particularly in States with low completion rates, and for FQCRs.

Recommendation to FNS and States

▸ Reduce SQCR and FQCR workloads, or otherwise allot more time to work on cases, to increase the level of effort invested per case.

Recommendation to States

▸ Use technology to improve the efficiency of State SNAP QC review processes, such as online workflow management systems, cellphones for SQCRs, and videoconferencing technology for client interviews.

Potential tradeoffs between case completion and error identification. Incentives to lower State error rates by coding cases with possible errors as incomplete may outweigh incentives to increase completion rates. In some States, consultants advised State reviewers to reduce efforts to complete cases beyond the minimum required and recommended other strategies to avoid errors.[7]

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[7] Anecdotal evidence from some study respondents suggests that cases suspected of error may be systematically designated as incomplete; if so, the error rate would be an underestimate of the true error.

Recommendations to FNS

▸ Clarify guidance in the *FNS 310 Handbook*, including more explicit guidance on the minimum expected effort prior to designating a case as incomplete.

▸ Reevaluate incentives provided to States for low error rates: Revising the system of incentives for States with low or improving error rates, or alternatively raising the penalties for incomplete cases, may reduce the disincentive for error identification during the QC process.

Recommendation to States

▸ Prioritize case completion: Strong emphasis by State QC management on QC case completion, independent of payment accuracy, may play a role in ensuring high completion rates.

3. Recommendations for Addressing Challenges Related to the SNAP Certification Process

Statewide efforts to modernize or streamline SNAP application and recertification procedures may have had unintended consequences for SNAP QC procedures. Challenges related to SNAP certification processes included the following.

▸ **Increased use of phone and online application procedures.** These changes are thought to contribute to the high rate of missed appointments for QC interviews by desensitizing clients to the need for in-person interviews during the QC process.

▸ **Reduced familiarity of eligibility workers with individual clients** as a result of increased reliance on phone interactions and case-banking case management structures. This may have reduced the likelihood that eligibility workers can assist SQCRs with locating a household, that household changes or notifications are documented, and that clients have a familiar person to call with questions about the QC process.

▸ **Reduced verification of eligibility criteria.** These changes may have increased the challenge of verifying information during the QC process by reducing the documentation available in the case file.

▸ **Inadequate awareness of the SNAP QC process among clients and eligibility workers.** This is thought to contribute to noncooperation of clients with QC reviews.

Recommendations to States

▸ Increase awareness among clients about the SNAP QC process and its requirements.

▸ Educate eligibility workers about the SNAP QC process.

▸ Train eligibility workers to provide more thorough documentation in the case file, even if verification from these sources is not required for certification.

Chapter 1. Introduction

This report presents the results of a U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) study of factors associated with incomplete case reviews in the Supplemental Nutrition Assistance Program's (SNAP) Quality Control (QC) process. Serving as a critical safety net for the Nation's families with low incomes, SNAP provided almost $70 billion in benefits during fiscal year (FY) 2014, reaching an average of more than 46.5 million Americans each month to help them obtain a healthful diet (USDA FNS, 2015a). FNS is committed to providing strong stewardship of the public funds used for SNAP. Given the scope and size of SNAP, it is vitally important that SNAP benefits go to those who meet the eligibility criteria and benefit amounts are correctly calculated.

The SNAP QC process was developed by FNS in 1977 to track and measure errors in eligibility and benefit determination. States conduct monthly reviews of a statistically representative sample of participating households (active cases) and households for whom participation was denied, terminated, or suspended (negative cases). These reviews measure the validity of SNAP cases and ultimately serve as the basis for the SNAP payment error rate. The SNAP QC process also provides FNS with a probability-based national sample that supports research on the SNAP population. While some national surveys collect data on individuals participating in SNAP, only the QC database includes the detailed information collected as part of the program application.

The purpose of this study is to examine the factors contributing to incomplete active cases and to describe challenges and best practices associated with SNAP QC completion rates. Minimizing bias in the QC dataset and most accurately estimating the eligibility and benefit errors made by States requires completing as many sample cases as possible. In FY 2014, the national completion rate was 91.9 percent. National completion rates for SNAP QC reviews have generally declined since peak levels in the 1980s, while State-level completion rates vary widely. This study sheds light on the sources of this variation and strategies that may enhance completion rates while addressing the five research objectives described in table 1.1.

Table 1.1. Study Objectives

Study Objectives
1. Describe the process of conducting a QC review at the State level.
2. Describe the process of conducting a QC review at the FNS regional level.
3. Describe the characteristics of incomplete cases as compared to complete cases and determine the extent to which incomplete cases may bias the data in the QC database.
4. Determine whether cases are being reviewed and processed correctly.
5. Describe the challenges and best practices in the QC review process at the State and Federal levels.

A. Background

Over the past few decades, the completion rate for reviews of active QC cases has decreased nationally and remains below the peak levels of 97 percent achieved in FYs 1985 and 1986 (figure 1.1). The rate declined to about 91 percent in FY 1998, rose slightly for the next 2 years, and then again declined steadily to a low of less than 90 percent in FY 2006. The completion rate rebounded somewhat to approximately 93 percent, where it remained between FY 2010 and FY 2013, before declining slightly to 92 percent in FY 2014.

Figure 1.1. National Completion Rate for Active SNAP QC Cases for FY 1984 to FY 2014
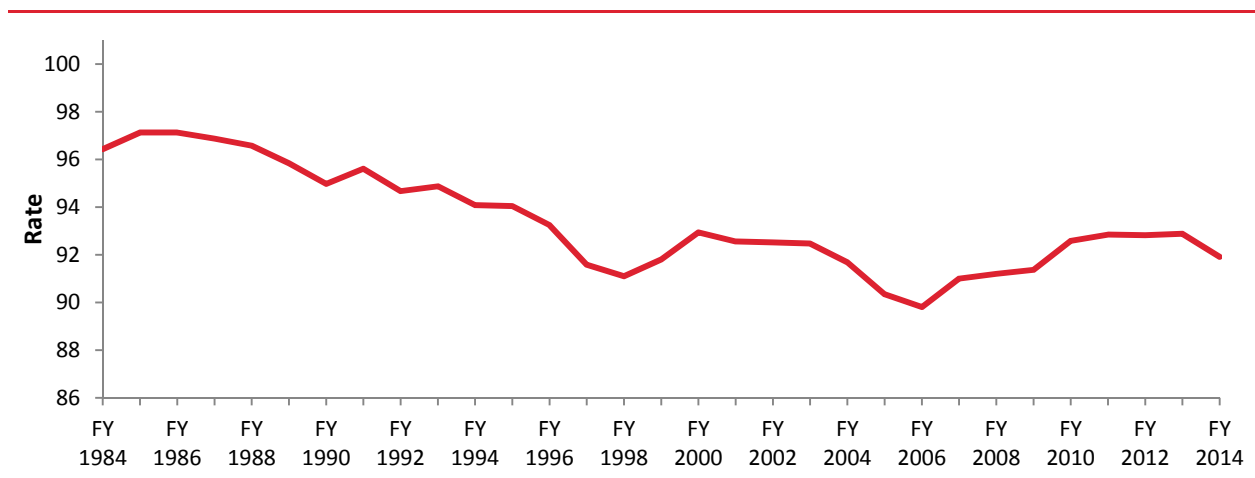
Very little is known about the reasons for the overall decline in the completion rate or the potential for incomplete cases to bias the estimates of error or household characteristics. A 1986 study by the Government Accountability Office[8] examined the QC processes and reported that both incomplete cases and those designated as not subject to review (NSTR) were twice as likely to contain errors as complete cases.

Completion rates vary even more across States, with some completing nearly 100 percent of cases and others fewer than 87 percent. Figure 1.2 shows SNAP QC completion rates for active cases in each of the 50 States, the District of Columbia, Guam, and the U.S. Virgin Islands in FY 2013, grouped approximately into thirds. Even within States, completion rates vary over time, sometimes slowly and sometimes fluctuating rapidly. For more information, see appendix A, which shows the active completion rate by State, arranged by FNS region from FY 1980 through FY 2014.

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[8] At the time it was called the General Accounting Office.

Figure 1.2. State SNAP QC Completion Rates for Active Cases, FY 2013
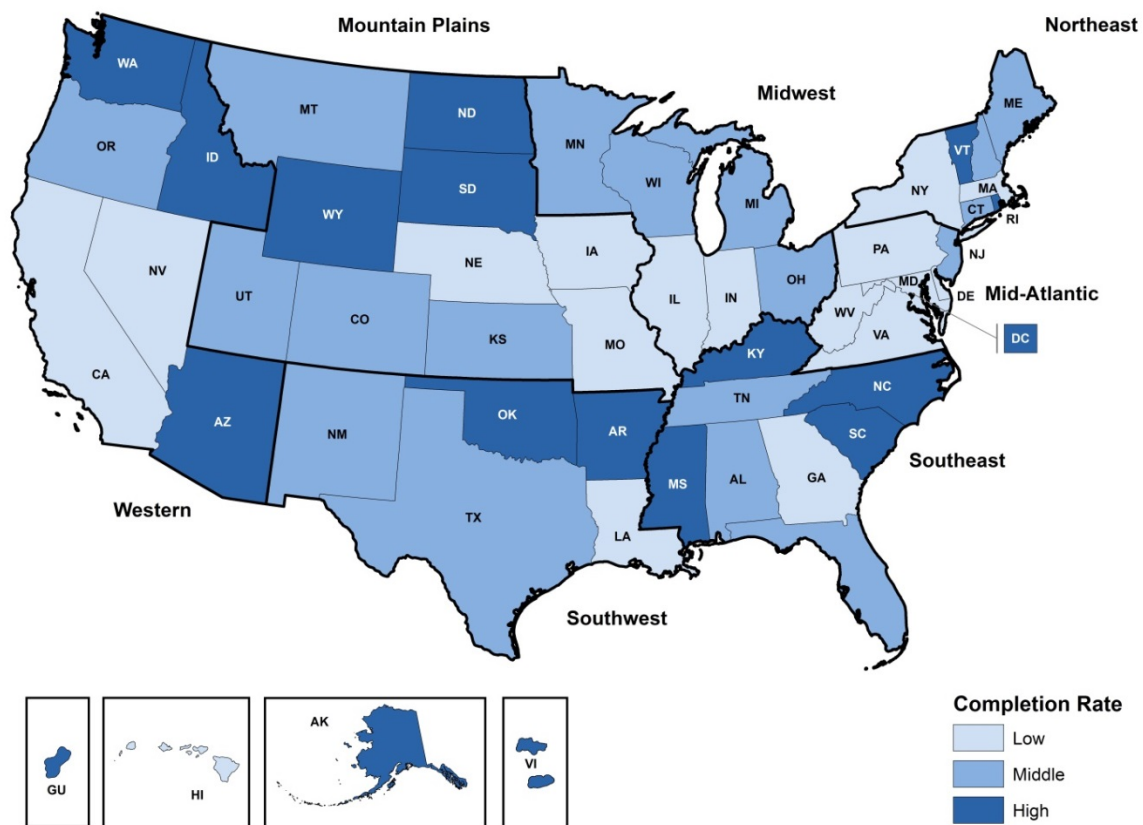
Differences in SNAP caseload or QC sample size, for example, do not appear to drive variation in completion rates across and within States. Variations in QC review practices at the State level, however, may play a role. For example, some States may rely more on extant data sources to complete reviews than others. In 2010, FNS re-reviewed a sample of incomplete cases and found many of these cases were classified as incomplete because the household failed or refused to cooperate and the reviewer did not use other options to complete the review. As a result, the reviewer disagreed with their designation as incomplete in about 60 percent of the cases (USDA FNS, 2010, p. 11).[9]

Incomplete case reviews pose potential problems for SNAP. First, FNS estimates of the SNAP payment error rate may not be accurate if incomplete cases are systematically different (e.g., more error-prone) from complete cases. Second, if incomplete cases are systematically different from complete cases, the national QC database widely used by FNS and other entities to study the SNAP population may over- or

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[9] The *FNS 310 Quality Control Review Handbook* requires that reviewers attempt to complete the QC review by verifying information through other sources or by using "likely conclusion." Many cases in the study sample may have been completed based on information from third-party sources. "Likely conclusion" is another option that may be used when a reviewer is unable to obtain all the necessary information to complete a review but is able to come to a likely conclusion about the accuracy of the case based on available information.

underrepresent certain types of households. Finally, increases in incomplete cases in turn create burden for Federal reviewers, who are required to re-review all incomplete cases.

B. Overview of SNAP QC Process

1. SNAP QC Process

The Food Stamp Act of 1977 established the current SNAP QC system, which was designed by FNS to monitor and measure errors in SNAP eligibility and benefit determination. FNS also uses SNAP household data generated by the SNAP QC system for an annual report describing the characteristics of the SNAP population[10] and for additional analyses.

FNS developed the *FNS 310 SNAP Quality Control Review Handbook (FNS 310 Handbook)* to provide the requirements and guidance for States to conduct SNAP QC reviews and determine errors. Within each State, a QC sample is selected each month. State SNAP QC personnel, known as State Quality Control Reviewers (SQCRs), conduct a review of SNAP cases selected in the sample each month. States must report the findings of the reviews to FNS within 115 days.

For each active[11] case selected for review, SQCRs examine the circumstances of the household during the QC sample month and the most recent certification month; verify those circumstances based on a household interview, documentation, and information from collateral contacts; and determine whether the household's SNAP eligibility determination and benefit calculation were correct or if any variances are found. A variance is defined as an "incorrect application of policy and/or a deviation between the information that was used and the information that should have been used to authorize the sample month's issuance" (*FNS 310 Handbook*, pp. 1–7). If the review findings indicate the household should have received a SNAP benefit that is at least $37[12] more or less than the benefit level determined for the sample month (including if the review determines the household was ineligible), the case is found to be in error.

After reviewing a QC case, the SQCR assigns one of three possible disposition codes:

1. **Complete:** The SQCR was able to verify all information needed to make a determination regarding eligibility and benefit levels. Complete cases include three outcomes: (1) a correct case (no variance), (2) a complete case with a variance but no error that exceeds the $37 threshold, or (3) a complete case with a variance and an error.[13]

2. **NSTR:**[14] The case should not be included in the QC sample. Examples include oversampled cases,[15] disaster cases, cases pending a hearing or under investigation for intentional program

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[10] The latest report, for 2014, is the latest in an annual series that dates back to 1976.

[11] Active cases are those determined eligible to receive SNAP benefits. Negative cases are those determined to be ineligible or terminated from the program. This study does not address the QC review process for negative SNAP cases.

[12] Prior to the 2014 Farm Bill, this threshold was $50. The threshold is $37 as of FY 2014 and will change with adjustments to the June cost for the four-person reference family for the Thrifty Food Plan.

[13] This would result in an under- or overpayment (including findings of ineligibility when the entire allotment is an overpayment).

[14] This study focuses on the factors that contribute to a case being disposed as incomplete and does not address factors related to NSTR cases. NSTR cases are not included in the QC database used for research purposes or in the calculation of payment error.

violation, and cases in which all household members have died, are institutionalized, or have moved out of the State.

3. **Incomplete:** The SQCR is unable to complete the review. This designation is made when the case record or household cannot be found, when the household refuses or fails to cooperate with the review and the SQCR cannot verify the needed information,[16] or when the SQCR cannot verify enough information to reach a likely conclusion about the eligibility and benefit determination of the case.

After States submit their reviews to FNS, FNS conducts a Federal re-review of a subset of SNAP QC cases, including all cases classified as NSTR or incomplete and a subsample of all complete cases. These re-reviews are conducted by Federal Quality Control Reviewers (FQCRs) at FNS' 7 Regional Offices, with each Regional Office covering 5-10 States (see figure I.2). As outlined in the *FNS 315 Validation Review Handbook (FNS 315 Handbook)*, which covers QC requirements at the Federal level, the purpose of these re-reviews is to validate the QC findings of the State agency. The re-reviews ensure the State—

▶ Has not biased its reported error rates

▶ Has complied with FNS requirements concerning sampling, estimation, data management, and QC review procedures, as outlined in the *FNS 310 Handbook* and *FNS 311 Quality Control Sampling Handbook (FNS 311 Handbook)*

▶ Has complied with Federal regulations concerning certification processes

▶ Has accurately determined eligibility and benefit levels of active cases[17]

▶ Has completed all possible reviews

During the Federal re-reviews, FQCRs in FNS regional offices determine whether the State conducted the QC review correctly and met all the standards in the FNS 310 Handbook. If the FQCR disagrees with the State's disposition of the case, the case may be returned to the State for further review and possible revisions. If FNS and States disagree on how eligibility and benefits for a particular case should be determined, the case may be forwarded to the FNS National Office for formal arbitration.

2. Calculation of SNAP Payment Error Rates From SNAP QC Data

Based on the final outcomes of the QC reviews, FNS calculates the State-specific and national error rates each year. The rates include both the percentage of cases in error (case error rate) and the dollar value of the errors (payment error rate).

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[15] Cases dropped to correct for excessive sampling are required to represent a random subsample of all selected cases (including those completed, not completed, and not subject to review; USDA FNS, n.d.).

[16] The distinction between *failure* and *refusal* to cooperate is whether the reviewer can verify that the household was contacted and was aware the reviewer was seeking the household's cooperation (*FNS 310 Handbook*, pp. 4–11). If, for example, a household agrees to attend an interview with the reviewer but does not show up or follow up with the reviewer within 10 days, the household may be classified as *refusing* to cooperate. If a household does not respond to messages left at the household's verified address, and the reviewer is unable to ascertain the household received the message, the household may be classified as *failing* to cooperate. Both failure and refusal to cooperate are valid reasons for classifying a review as incomplete, but refusal to cooperate may result in benefit termination.

[17] Federal re-reviews also ensure the State has accurately determined the validity of actions on negative cases; however, this study focuses only on active cases.

For each State, payment error rates are calculated annually based on the level of overpayments and underpayments among completed reviews of active cases. For States with less than 98 percent of their sampled cases completed, an adjustment is made in the error calculation to account for the unknown error among the incomplete cases.[18] The completion rate is factored into this adjustment, such that penalties increase somewhat as the proportion of completed cases declines.

The national payment error rate is calculated based on an average of the State error rates, weighted to account for differences in caseload size. States may be sanctioned by FNS if their payment error rate exceeds a certain threshold relative to the national average. They may also receive bonuses for low or improving error rates.

The national payment error rate has declined nearly continuously over the last 3 decades, decreasing from a high of 12.4 percent in FY 1981 to an all-time low of 3.2 percent in FY 2013 (figure 1.3). The payment error rate increased slightly to 3.7 percent in FY 2014. Many factors may have contributed to the general decline in the payment error rate, including the following:

▶ Increased emphasis on SNAP QC and the importance of payment accuracy at the State and national levels

▶ Administrative changes (e.g., reducing the number of changes households are required to report between certifications as a result of simplified reporting)

▶ Legislative changes, such as increases in the payment error threshold (e.g., from $25 to $50 in the 2009 American Recovery and Reinvestment Act, resulting in fewer cases considered to be in error[19])

While the SNAP payment error rate has decreased, the percentage of incomplete SNAP QC reviews has increased (i.e., incompletion rate; figure 1.3). This pattern introduces potential concerns about the validity of error rate estimates. Although FNS applies a small adjustment to the payment error rates of States that complete fewer than 98 percent of their case reviews, it is unclear whether the adjustments sufficiently reduce the potential bias associated with the unknown level of error in these cases. If incomplete cases are more error-prone than complete cases, for example, State and national error rates may be underestimated. As a result, it is critically important for FNS to understand the factors that contribute to incomplete case reviews and to identify potential means to increase SNAP QC completion rates.

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[18] This adjustment is calculated as follows: 2 x (1 – completion rate) x standard error of State error rate.
[19] The 2014 Farm Bill then decreased the threshold to $37, as mentioned above. The $50 tolerance was in effect during FY 2013, the most recent year for which data were available for this report.

Figure 1.3. National SNAP Payment Error Rate and Percentage of Incomplete SNAP QC Review Cases Since FY 1983
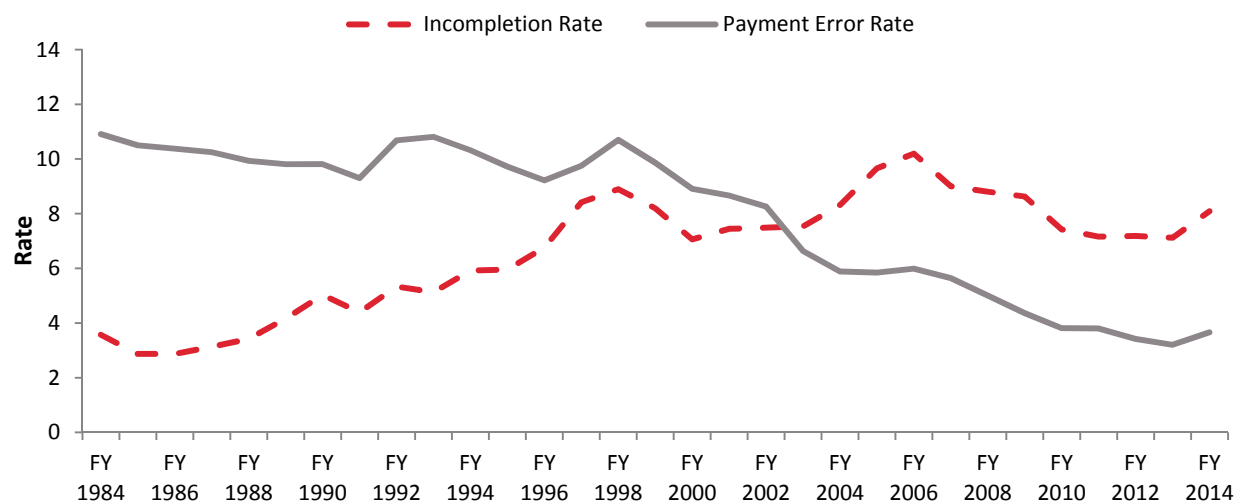
C. Organization of the Report

This report sheds light on the SNAP QC processes at the State and Federal levels, particularly as they relate to incomplete cases, and describes challenges and best practices with regard to completing cases. Chapter 2 provides an overview of the methodology used to conduct the study. Chapters 3 and 4 describe the State and Federal SNAP QC review processes, respectively. Chapter 5 compares the characteristics of households in complete and incomplete SNAP QC cases and assesses any evidence that incomplete cases cause bias in the SNAP QC database. Chapter 6 presents results from field re-reviews of incomplete SNAP QC cases conducted by the study team and includes a comparison of steps taken in re-reviews to those taken by SQCRs. Chapter 7 summarizes the challenges SNAP QC reviewers face when conducting case reviews and identifies promising practices and recommendations for enhancing SNAP QC completion rates.

Four appendices provide additional detail on the study methods and data. Appendix A illustrates the trend in SNAP QC completion rates over time at the State level. Appendices B and C include detailed results from the surveys of State and Federal SNAP QC staff, respectively. Appendix D provides detailed results for the administrative data analysis.

Chapter 2. Study Methodology

The goals of this study are to identify factors that contribute to incomplete QC cases and to recommend ways to increase the completion rates for SNAP QC reviews. This chapter describes the study's methods and data sources. Section A describes data collection and analysis, and section B describes study limitations and considerations.

A. Data Collection and Analysis

The study used the following four complementary study methods:

1. Site visits to six States and two Regional Offices

2. Web and phone surveys of the remaining States and Regional Offices

3. Collection of extant administrative data from five States

4. Field re-reviews of 75 recent incomplete cases from three States

Table 2.1 presents a summary of the data sources used for each of the five research objectives. The remainder of this section describes the four methodological components: site visits (section 1), surveys (section 2), administrative data collection (section 3), and field re-reviews (section 4).

Table 2.1. Summary of Data Collection Sources and Methods by Study Objective

Study Objective	Data Source
1. Describe the process of conducting a QC review at the State level.	• Site visits to States, including in-depth interviews with SQCRs and QC managers • Survey of State managers and reviewers
2. Describe the process of conducting a QC review at the regional level.	• Site visits to Regional Offices, including in-depth interviews with FQCRs and QC managers • Survey of FQCRs
3. Describe the characteristics of incomplete cases as compared to complete cases, and determine the extent to which incomplete cases may bias the data in the QC database.	• Administrative data
4. Determine whether cases are being reviewed and processed correctly.	• QC field re-reviews of incomplete cases
5. Describe the challenges and best practices in the QC review process at the State and Federal levels.	• Site visits to States • Site visits to Regional Offices • Survey of State QC managers and reviewers • Survey of FQCRs

1. Site Visits to States and FNS Regional Offices

The study team conducted site visits to SNAP QC offices in two FNS Regional Offices and six States to collect in-depth information about the State and Federal SNAP QC processes. The study team developed and revised four semi-structured interview protocols for these visits, including separate instruments for FNS regional QC managers, FQCRs, State QC managers, and SQCRs. The study team pretested these instruments with SNAP QC staff from two States and used the staff's feedback to make additional revisions to improve clarity and content in the instruments. The interviews lasted about 1 hour.

Interview topics included staff resources, a description of QC review procedures and tools, reasons for incomplete cases, challenges and best practices related to QC completion, along with other relevant staff perceptions and experiences.

FNS Regional Office Site Visits. The study team conducted site visits at the Mid-Atlantic Regional Office (MARO) and the Southwest Regional Office (SWRO) in August and September 2013, respectively. FNS selected MARO because of its relatively higher number of low-completion States and SWRO because of its relatively higher number of high-completion States.

The study team conducted a total of 14 semi-structured interviews (7 in each Regional Office). During each site visit, the study team interviewed the QC branch chief, the QC coordinator, and five FQCRs, which together encompassed nearly the entire SNAP QC staff in the two Regional Offices visited.[20] The study team also conducted a case file review during each visit to gain understanding of the case review steps for active SNAP QC cases at the regional level, with particular attention to incomplete cases. During this case file review, an FQCR walked the study team through the steps taken when reviewing a case, including an overview of the components of the case file, an explanation of the documentation reviewed during the course of a review, and a description of the process for documenting the Federal re-review findings and the procedures for communicating and arbitrating findings with the State agencies.

State Site Visits. Six states—Iowa, Kentucky, Mississippi, Ohio, Oklahoma, and Pennsylvania—were visited between May and July of 2014. FNS selected three of these States—Iowa, Ohio, and Pennsylvania—because of their relatively low rates of SNAP QC completion. Mississippi and Oklahoma were selected because of their relatively high rates of SNAP QC completion, and Kentucky was selected because of its recently improved completion rate. Because of the geographic dispersion of QC staff across each State, multiple sites were visited in some States. In other States, QC staff traveled to a centrally located office where the interviews took place. Within each State, respondents varied by tenure with SNAP QC and by rural/urban composition of their typical case assignments.

The study team conducted a total of 48 semi-structured interviews. During each State site visit, the study team interviewed the SNAP QC director, two QC supervisors, and five SQCRs.[21] In addition to the interviews, the study team conducted a case file review in each State, when State SNAP QC staff walked the study team through a case file and the steps taken to review an active SNAP QC case, with particular attention to incomplete cases. For example, the SQCR acquainted the study team with the components of the case files received from the local SNAP offices, the order of actions taken by the reviewer to conduct the review, the tools and resources used, how the review findings are documented, and whether and by whom the case receives a secondary review before submission to FNS. Actions taken prior to classifying a case as incomplete were emphasized during this discussion.

Data Analysis. With the permission of each respondent, the study team recorded and transcribed the interviews.[22] The study team analyzed the transcripts and detailed notes using NVivo10 software. The study team developed the coding scheme in an iterative process during the early stages of site visits and interviews. Codes were developed to answer research questions by identifying interview text relevant to

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[20] Two FQCRs who were not available in person during the visit participated in a phone interview with the study team following the site visit.

[21] Most interviews were in person during the site visits, but eight were conducted by telephone following the visit because the respondents were located too far from the site visit location to interview in person.

the research questions. To ensure intercoder reliability, the coding team met regularly during the coding process to discuss the appropriate use of codes and to develop new codes as necessary. The analysis included comparisons of States with high completion rates to those with low completion rates to identify any differences.

2. Surveys of State and Federal SNAP QC Staff

Surveys of State and Federal SNAP QC staff collected information about the SNAP QC process in the States and regions that did not participate in site visits. The surveys gathered information on the same topic areas covered during the site visits but in a closed-ended questionnaire format suitable for a Web survey (e.g., as compared to the open-ended semi-structured format of interview instruments). The surveys provided respondents an opportunity to offer additional input about the SNAP QC review process in a comment field at the end of the survey. Verbatim responses in this field were reviewed and analyzed in conjunction with the survey and interview data from the same respondent groups.

The two State instruments, a manager survey and an SQCR survey, captured similar information, with some variations in questions to reflect different job duties (e.g., questions about supervision of staff in the manager survey, detailed questions about reviewer procedures in the SQCR survey). The study team developed and pretested these instruments with staff from two States, in combination with interview instrument pretests described above. The instrument for the FQCR survey contained similar questions as the SQCR survey, with the focus on the Federal process rather than the State process. The survey administration time was approximately 30 minutes per respondent for all three surveys, and the instruments were reviewed by the Office of Management and Budget and an institutional review board.

All Regional and State QC staff were asked to respond to the surveys; no sampling was performed. The surveys were conducted online with telephone follow-up for SNAP QC staff in 42 States, including Guam and the U.S. Virgin Islands, and 5 Regional Offices.[23] Data collection began in July 2014 and ended 5 weeks later. The State survey achieved a 90-percent response rate[24] and the Regional Office survey achieved a 97-percent response rate (table 2.2). Detailed results from these analyses appear in appendix B.

Table 2.2. State and Regional Survey Response Rates

	Eligible Population	Respondents	Response Rate
States	634	568	89.6%
Regional Offices	30	29	96.7%

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[22] Two respondents did not wish to have the interviews recorded. In lieu of recording/transcribing, the study team took detailed notes during these interviews.

[23] The study plan was to contact all SNAP QC staff in States and Regional Offices that did not participate in pretest or site visits. However, three States did not agree to participate in the survey. Three States provided names and contact information for the SNAP QC directors but for no other staff. Finally, California administers SNAP QC at the county level for several of its largest counties, while State reviewers conduct reviews for all the smaller counties. As a result, California has a much larger number of SQCRs, so collecting staff information from counties for a complete frame would have been challenging. Instead, State QC staff who conducted reviews for 39 (of 58) counties and county QC staff from the 2 largest counties (Los Angeles county and San Bernardino county) were included in the sampling frame.

[24] The State response rate is based on the 42 States that granted permission for their staff to participate in the survey. For three of these States, only the director was included in the survey frame. Three other States refused to participate in the survey, and no staff from these States was included in the survey frame.

Data Analysis. State responses were assigned to three analysis groups corresponding to high, average, and low completion rates. Group assignment was based on dividing participating States into thirds according to survey States' completion rates in FY 2013, the most recent rates available at the time of the survey data collection.[25,26] Results were analyzed to examine any trends that distinguished States with high completion rates from States with low completion rates. Regional responses were analyzed as one group.

3. Administrative Data Collection

Administrative data were used to assess any differences in the characteristics of complete and incomplete cases, including comparisons of incomplete cases to complete cases with errors and complete cases with no errors. Information was collected on demographic (e.g., household size, composition), economic (income and benefits), and administrative (certification/recertification status) characteristics. Five States—Iowa, Kentucky, Mississippi, Ohio, and Oklahoma[27]—provided the most recent available administrative data for all *incomplete* active cases from the previous 3 fiscal years (FY 2010–FY 2012). To reduce State burden, FNS extracted administrative data for the *complete* active cases over the same period from FNS's SNAP Quality Control System (SNAP QCS). Table 2.3 indicates the number of complete and incomplete cases included in the administrative data extracts per State.

Table 2.3. Number of SNAP QC Cases Included in Administrative Data Extracts per State, FY 2010–FY 2012

	Iowa	Kentucky	Mississippi	Ohio	Oklahoma	Total
Complete cases	2,877	3,855	3,673	3,899	3,375	17,679
Incomplete cases	356	249	99	329	96	1,129
Total	**3,233**	**4,104**	**3,772**	**4,228**	**3,471**	**18,808**

Data Analysis. Results were analyzed for individual States and for all five States together. The analysis sought to identify differences in the characteristics of complete and incomplete cases and any patterns that may distinguish States with high completion rates from those with low completion rates.[28] Differences greater than 5 percentage points are described in chapter 5, while all results are included in appendix D.[29]

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[25] The ordering process did not include site visit and pretest States, the three States that declined participation in the survey, or the three States where only the director agreed to participate. Completion rates for the three groups ranged from 86.34 percent to 92.04 percent for the low-completion-rate group, 92.06 percent to 94.66 percent for the average-completion-rate group, and 94.74 percent to 100 percent for the high-completion-rate group.

[26] This method of defining comparison groups was selected to maximize the cell size in each group, which would best support comparisons between groups. Results were similar when defining the high- and low-completion-rate groups more narrowly, such as by the top and bottom quartiles, rather than thirds.

[27] As a result of changes to its IT system, Pennsylvania was unable to provide data for all 3 fiscal years and was not included in this analysis.

[28] In some instances, variables were missing for the incomplete cases for a given State but not for the complete cases.

[29] Because results are based on a census of QC data for these five States, differences do not need to be tested for statistical significance. A threshold of 5 percentage points was selected to approximate what may be considered a meaningful difference between complete and incomplete cases.

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4. Field Re-Reviews of Incomplete SNAP QC Cases

Field re-reviews of incomplete QC cases were conducted in Iowa, Ohio, and Pennsylvania—three States identified by FNS as having low completion rates. FNS provided the study team with 25 of the most recently reviewed incomplete active cases from each of these 3 States, for a total of 75 cases. The cases selected had been reviewed and identified as incomplete by both the States and Regional offices.[30] Field staff conducted the re-reviews over an 8-week period from September through October 2013. The cases were initially sampled for QC review between October 2012 and March 2013.

Experienced field interviewers were selected and trained by the study team to conduct the SNAP QC re-reviews. Two field interviewers from each of the three States were recruited based on their extensive experience conducting interviews in respondents' homes and reaching populations that were difficult to locate as a result of circumstances such as disconnected phone numbers, unemployment, and frequent address changes. FNS conducted a 3-day intensive training course for the field interviewers covering SNAP eligibility and the QC review process, and the study team conducted additional training on administrative procedures and interviewing techniques.

After training, each field interviewer spent 8 weeks attempting to complete the assigned cases. The process for conducting the QC re-reviews was consistent with the general guidance provided by the *FNS 310 Handbook*. General steps included reviewing the case file, contacting the client to schedule an in-person interview, conducting the interview, verifying eligibility criteria, and documenting findings. Because the *FNS 310 Handbook* guidance is broad and leaves States flexibility in executing the details of QC review procedures, the study team provided field reviewers additional instruction specific to the re-reviews such as how and when to contact the clients to standardize procedures across field staff. The field data collection process follows:

▶ **Preparing for the QC review** by reviewing the case record for each assigned case and extracting all necessary information needed for the interview. Field interviewers reviewed and recorded the findings of the *FNS-380* form,[31] steps taken by the SQCR to conduct the original review, all contact attempts and communications, and the case review results of the SQCR and Federal review. Field interviewers identified elements that were adequately verified and documented in the case record (and thus needed no further attention during the field review) and identified any missing documentation that would need to be obtained from the household or collateral contacts

▶ **Contacting SNAP clients by phone to schedule an in-person interview**, followed by sending them a letter with the interview date, time, and location, and list of verification documents needed. Field interviewers scheduled interviews in clients' homes or neighborhood locations. Field interviewers were encouraged to make up to seven phone attempts of a working number for each client and to attempt a disconnected number once a day for the span of 2 weeks to contact clients.

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[30] Six of the 75 cases were removed from the initial re-review caseload because they were under investigation or had been completed since the Federal review, resulting in a total re-review caseload of 69 cases.

[31] The *FNS-380* form is used to record information from the case record, to plan and conduct the field investigation, and to record findings and document the verification that substantiates the eligibility and benefit level.

- ▸ **Conducting interviews and obtaining verifications** from clients or collateral contacts. A field interviewer traveled to the client's home or other neighborhood location at the appointed date and time of the interview. If the interview was conducted, the field interviewer completed the interview using the *FNS-380* form and attempted to obtain necessary documentation to verify residence, household composition, income, rent, utilities, mortgage, and assets. Field interviewers also attempted to reach collateral contacts as needed to obtain necessary documentation that was not in the case record or available from the client. Field interviewers were instructed to make up to two visits to the client's home (or other agreed-upon location) to attempt to conduct the interview, and up to seven phone attempts of a working number and one in-person visit to contact a collateral contact to obtain documentation.

- ▸ **Documenting all steps** in the process and recording all findings in the *FNS-380* form. Field interviewers documented (1) preinterview activities (e.g., efforts to contact the client), (2) interview procedures (e.g., whether the interview was conducted, what documentation was obtained), and (3) postinterview procedures (e.g., efforts to reschedule a missed interview or obtain outstanding verifications).

Field interviewers spent, on average, 30 calendar days to conduct each re-review (from initial contact attempt to documenting final conclusion), although time ranged from 1 to 58 calendar days.[32] Like SQCRs, field interviewers worked on several review cases at the same time, so these are not full days spent on a single case; rather, these estimates of time reflect the total number of days that elapsed from the first day the individual worked on a case until the day a determination was made. For incomplete cases, the length of time covers the time from the day the field interviewer began working on the case through the day that the decision was made that the case could not be completed.

Data Analysis. Following the re-reviews, the study team examined the findings to determine whether any of the cases previously identified as incomplete by State and Regional QC review staff had been successfully completed. Completed case reviews were those for which the field interviewer was able to obtain all the needed verifications to determine whether the eligibility determination and benefit amount were accurate for the sample month. The study team reviewed and verified information recorded on the *FNS-380* form and completed the QC calculations to determine whether any completed case reviews contained payment errors. In addition, a QC reviewer external to the research team reviewed and validated all findings and error analyses. For re-reviews that completed previously incomplete cases, the team examined the steps taken by field interviewer staff to identify potential strategies that might help increase completion rates. For re-reviews that remained incomplete, the team identified common issues that prevented completion.

B. Study Limitations and Considerations

The findings presented in this report are descriptive, and several factors merit consideration when drawing conclusions or attempting to make generalizations. First, variables associated with SNAP QC at the State level cover many elements that vary widely across States and are likely to interact:

- ▸ Staff and caseload sizes
- ▸ Population demographics

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[32] In comparison, SQCRs spent 42 days on average attempting to complete these reviews, ranging from 7 to 84 calendar days.

- ▶ QC procedures, tools, and training
- ▶ SNAP eligibility determination processes and options

Such complexity poses a serious challenge to identifying what factors facilitate or impede review completion. Similarly, variation across States within each region inhibits the ability to draw conclusions about the relationship between factors at the regional level and State completion rates.

One objective of the study was to determine whether cases deemed incomplete by State and Federal QC personnel could be completed. However, important differences remained between the study procedures and State and Federal review procedures as described below:

- ▶ In many cases, many months had elapsed from the time of the original QC review month and the time the study team attempted the re-review. This produced additional challenges for the study team in locating a relatively mobile population and in securing verification of financial and household composition details.

- ▶ Research staff did not have access to the same tools as State and Federal staff to complete the reviews. For example, field re-reviewers did not have access to State or Federal electronic databases to obtain verification of eligibility criteria (e.g., income, employment) or additional contact information for clients or potential collateral contacts.

- ▶ Research staff required signed consent from the household to obtain information from collateral contacts. In many cases, State SNAP QC reviewers may request information from collateral contacts using consent included on the original SNAP application.

- ▶ Research protocols required maintaining confidentiality of the respondents, and field interviewers assured respondents no information they provided would be conveyed to FNS or the State. Unlike SNAP QC reviews, participation in the re-review process was voluntary; field interviewers had no authority to terminate (or reinstate) SNAP benefits for noncooperation, and no incentives were offered for participation in the study. As a result, SNAP clients had different motivations for participating in re-reviews relative to State QC reviews.

An original objective of this study was to determine the impact of incomplete cases on overall error rates, but the data collected for this study were too limited to address this objective:

- ▶ First, the number of cases selected for field re-review (and completed) for this study was too small to support drawing conclusions about the overall SNAP payment error rates. The study does, however, examine the payment error among the subset of cases completed during the field re-reviews. Further research with a larger sample of cases would be necessary to assess whether bias exists in State or national error rates.

- ▶ Similarly, the administrative data analysis examines the demographic, economic, and administrative characteristics of incomplete cases as compared to complete cases. Without knowing the level of error among the incomplete cases, however, comparisons between complete cases found to have error and incomplete cases (with unknown error) do not permit conclusions about potential bias in overall case and payment error rates.

Chapter 3. State QC Review Process

This chapter examines States' processes for completing QC reviews, from case assignment and reviewer caseload through second-party reviews (e.g., by a supervisor) and submission of QC findings to FNS. Particular attention is given to how review procedures vary across States generally and by different categories of SNAP QC completion rates. Findings are based primarily on in-depth semi-structured interviews with SNAP QC directors, supervisors, and reviewers in six States and supplemented with data from a survey of the same respondent groups in the remaining States.[33] Percentages presented in the text and figures refer to survey results. Unless otherwise noted, results from qualitative interviews and the surveys were consistent.

Both survey and interview data were analyzed with a focus on potential differences by State completion rate.[34] Survey results were analyzed according to three categories of State SNAP QC completion rates—low, average, and high—based on rank ordering the 42 surveyed States by their FY 2013 completion rate and separating them into thirds. Detailed tabulations of survey results appear in appendix B.

Section A of this chapter describes State procedures for conducting SNAP QC reviews. Section B summarizes State QC staff perceptions of the reasons for incomplete cases and how they may have changed over time. Section C provides an overview of the tenure, workloads, training, and oversight of State SNAP QC reviewers.

A. State SNAP QC Review Process

Although States exhibit variation in the details of their QC process, the general steps in the SNAP QC review process are the same in all States. That process begins with case sampling and concludes with transmitting the review results to FNS. This section describes these steps (see figure 3.1) with an emphasis on variations in practice between States with high completion rates and those with low completion rates. Survey results related to this section appear in appendix B tables B.1a and B.1b.

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[33] As described in chapter 2, all 53 State SNAP agencies were invited to participate in the study. Six participated in site visits, 2 participated in pretests of interview and survey instruments, 3 declined to participate, and the remaining 42 participated in the survey. In three States participating in the survey, only the SNAP QC director participated in the survey.

[34] Potential variations by State completion rate are reported where present; it should be noted, however, that many findings reported in this chapter are based on interview data from 6 States and may not be generalizable to all States.

Figure 3.1. Overview of the State SNAP QC Review Process

QC cases are sampled and assigned to reviewers

SQCR schedules the household interview and prepares for the interview by reviewing case information and checking electronic databases

SQCR collects the necessary information through a household interview and/or collateral contacts. SQCR conducts follow-up with nonresponsive clients as needed

SQCR processes the case, including documenting review process and making error determinations

A second party (or parties) review(s) the case before the review findings are transmitted to FNS through SNAP QCS

1. Case Sampling and Assignment to SQCRs

The first step in the SNAP QC process is to draw the sample of SNAP cases each month and assign them to SQCRs.

Sampling. Based on specifications outlined in the *FNS 311 Quality Control Sampling Handbook*, State statisticians develop a sampling plan each year for selecting a random, representative sample of active and negative SNAP cases each month. The plan identifies the methodology for how cases will be sampled. Each year, the plan is revised and submitted to FNS for approval. Active and negative SNAP QC cases are then sampled from administrative records each month. Sample sizes ranged from 325 in the U.S. Virgin Islands to 1,359 in Arkansas in FY 2013, with the majority of States sampling between 1,050 and 1,200 cases.[35]

If a State does not complete the minimum number of cases specified in its annual plan, it must sample additional cases to meet that requirement. Additional cases may be drawn at any point in the fiscal year. One of the interviewed QC directors reported monitoring the total number of completed cases each month to sample additional cases relatively early in the year if it appeared additional cases would be needed, while reviewers in other States described having larger QC caseloads toward the end of the year as a result of sampling additional cases late in the year.

Case Assignment. Once the cases are sampled each month, they are assigned to SQCRs. Cases are typically assigned to reviewers based on geographic proximity of cases to the reviewers' location and workload equity across reviewers. Reviewers do not specialize in certain types of cases, such as non-English-speaking, homeless, or larger households.

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[35] Sample sizes among site visit States ranged from 1,075 in Iowa to 1,308 in Kentucky in FY 2013.

SNAP QC staff in the six site visit States were located throughout the State—some work in local SNAP offices (three States), others in State government offices (two States), or their homes (one State). In no State were reviewers centrally located in a single office. Typically, SQCRs (all those interviewed and 75 percent of those surveyed) reported occasionally being assigned additional cases when other reviewers were on leave or staff resources were otherwise limited.

Although cases are assigned to minimize the distance reviewers must travel for household interviews, travel is sometimes significant. Twenty-nine percent of surveyed reviewers reported at least one overnight trip away from home each month. Among site visit States, overnight trips were less frequently reported, but reviewers in more rural areas travelled further (up to 4 hours or more) to review a case.

Time spent in the field offers another perspective. Reviewers across these States reported spending a range of 1–7 days in the field each month conducting interviews, with many reporting 3–5 days. The number of days in the field tended to vary based on the distance between cases and the number of missed interviews that needed to be rescheduled.

Review Timeline. The QC review period for States is 115 days from the time cases are sampled until the time the review results must be submitted to FNS. That time is divided between first-line reviews by SQCRs, second-party reviews by supervisors or other managers, and data entry for final submission. Across the six site visit States, SQCRs reported having from 30 days to 3 months to conduct reviews. In four of these States, reviewers reported review timeliness is part of their performance evaluation. Among the surveyed States, 89 percent of SQCRs "agreed" or "strongly agreed" with a statement indicating they have sufficient time to complete the SNAP QC reviews assigned to them.

Variation in Case Sampling and Assignment by State Completion Rate Group

SQCRs in States with low completion rates reported shorter periods of time to conduct their reviews than SQCRs in other States; approximately half as many reported having at least 75 days (15 percent) as SQCRs in States with average and high completion rates (30 percent and 34 percent, respectively; figure 3.2).

Figure 3.2. Length of Time Reviewers Are Given To Complete Reviews by State Completion Rate Group
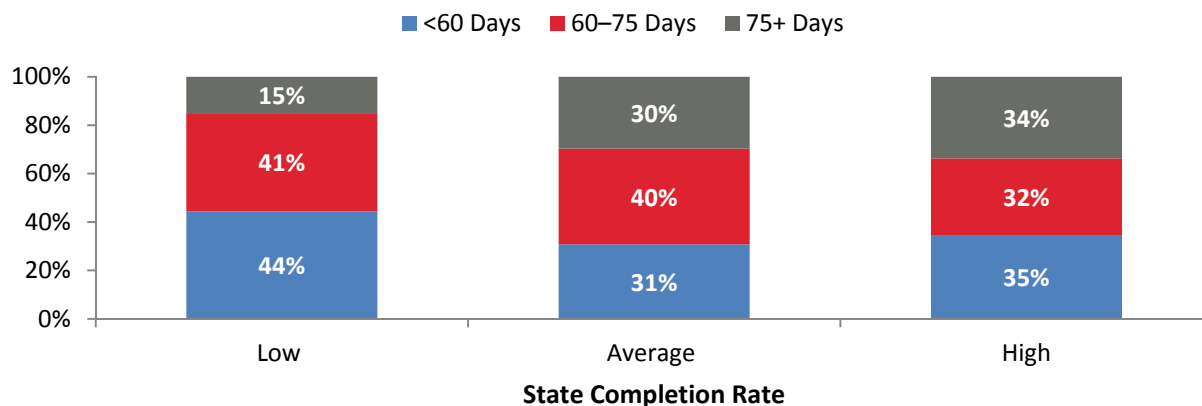
Source: Survey of State Quality Control Reviewers

Reviewers in States with low completion rates were somewhat less likely to report they "strongly agreed" to a statement indicating they had sufficient time to complete the SNAP QC reviews assigned to

them (25 percent, compared to 31 percent and 35 percent of reviewers in States with average and high completion rates, respectively).

Reviewers in States with low completion rates were also somewhat less likely to be given interim deadlines during their QC review period: 51 percent, compared to 66 and 61 percent of reviewers in States with average and high completion rates, respectively.

2. Interview Preparation

SNAP QC reviews require an in-person interview with the client in most cases.[36] This section describes how reviewers prepared for these interviews, including conducting a desk review of the case file, searching electronic databases, scheduling the interview appointments, and confirming the interview.

Case File Review. As part of this first step, reviewers in several States reported printing relevant screens from the administrative SNAP database to develop a hardcopy case file. At this stage, many reviewers also entered case file information for the certification month in the *FNS-380* form.[37] Other reviewers reported completing the form at the end of the process. The majority of SQCRs surveyed (61 percent) reported the case files they received from the local SNAP office typically contained all the certification information they needed to conduct the review. In some cases, however, reviewers reported needing to contact the local SNAP office for additional information if the case file was incomplete.

Review of Electronic Databases. Reviewers were frequently able to gather some of the verifications they needed from various databases at this stage, such as the Income and Employment Verification System, Department of Motor Vehicles databases, and property records. Some State reviewers had access to other public assistance program systems, such as Medicaid, childcare assistance, or child support collection. In addition to providing information on other sources of income, these databases may include alternate contact information for clients or collateral contacts. Many reviewers also had access to and regularly used The Work Number, a database many States pay to subscribe to that provides information on employment and earnings.

Many reviewers supplemented these sources with Internet searches when trying to find a client. The online sources commonly reported were Google.com, whitepages.com, 411.com, and reverse phone number search Web sites. These sites typically provide some information for free but often have limited utility without paying for additional information. One respondent noted that having State-funded access to paid services on these sites would improve the ability for reviewers to locate clients. Few reviewers used social media mechanisms, such as Facebook.

Scheduling Interviews. Reviewers in site visit States reported sending a letter to notify clients of their selection for a case review and, in five States, to assign a date and time for an interview appointment. Consistent with this approach, virtually all SQCRs surveyed (99 percent) reported contacting clients by mailing a letter.

In five of the six States visited, interview dates, times, and locations were designated by the QC staff. Typically, the appointment letters also included a list of documents the client should bring to the appointment for verification purposes (e.g., pay stubs, lease agreements). In attempting to elicit more

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[36] Most States, including each of the six site visit States, had exercised a waiver allowing telephone interviews with households receiving less than $100 in benefits.

[37] The *FNS-380* form is used (as a worksheet) for the QC process to document a household's eligibility information for the certification and review months and to identify errors.

attention and response from clients, a small number of SQCRs reported customizing these letters. Examples of such personalization included handwritten notes, handwriting addresses on the envelopes in hopes of increasing the likelihood clients would open the letters, and highlighting the letter text requesting clients call and confirm the appointment.

In some States, letters were generated automatically and sent from a mail center rather than from the reviewer directly. While reviewers typically arranged their interview schedules to minimize travel time, clients had the option to call the reviewer to reschedule appointment times or locations.

In one State, a mail center generated and sent initial letters to clients notifying them their cases had been selected for review and their reviewers would call them to arrange interviews. Reviewers in this State then called each client a few days after the letter was mailed to establish a mutually convenient day and time for the interview.

Interview Confirmation. While some clients called to reschedule or confirm their appointments upon receipt of the letters (one reviewer estimated roughly 5–20 percent of respondents confirmed appointments), many did not. Many reviewers contacted the households by phone in an attempt to confirm the appointments, while some did not. Even if the SQCR had not successfully reached the client to confirm the appointment, reviewers in most site visit States traveled to the designated location for the appointment.

Variation in Interview Preparation by State Completion Rate Group

A somewhat larger proportion of reviewers in States with high completion rates reported the case files they received typically had all the certification information they needed to conduct the review: 68 percent, compared to 57 and 59 percent of reviewers in States with low and average completion rates, respectively.

Reviewers in States with low completion rates were less likely to routinely call clients prior to interviews—either to schedule or confirm appointments. In contrast, phone follow-up appeared to be a more standard procedure in States with high completion rates.

3.   Household Interview

This section describes the household interview procedures, including the location and the language of the interview.

Interview. QC interviews with clients typically took place on weekdays during standard business hours, although reviewers accommodated clients' needs as much as possible by occasionally scheduling early morning or early evening appointments. Interview length varied from 10 to 15 minutes in very simple cases to 45 minutes or an hour for more complex cases.

During interviews, SQCRs reviewed relevant case file information with the clients, noted any changes, and collected as much documentation as possible (e.g., identification, pay stubs, unearned income verification, bank statements, housing and utilities costs). Commonly, clients did not have all the necessary documents available during the interview. In these cases, reviewers typically provided the client with a list of documents still needed and a deadline for submitting them; some reviewers also provided a stamped envelope for submitting them. Reviewers typically requested that clients provide one or two collateral contacts that could verify household composition or other elements and asked the clients to sign a release. This signed permission authorized other parties (e.g., banks, employers, landlords) to provide information to QC staff.

Interview Location. In five of the six site visit States, interviews typically took place in local SNAP offices, although exceptions were made to accommodate client needs.[38] Most reviewers reported conducting interviews in clients' homes at the request of clients who were elderly or had disabilities and were unable to travel to a local office. Others reported conducting reviews in public places such as libraries, fast food restaurants, or workplaces as alternate locations to local offices. In these States, safety concerns were cited as one of the primary reasons for conducting interviews outside the home. Study interview data, for example, indicated concerns related to high-crime neighborhoods, criminal history of clients or members of their household, and presence of dogs. Budgetary reasons were also provided for limiting interviews to local offices.

In contrast, one State encouraged reviewers to conduct all interviews in clients' homes. The advantages reported were to make clients feel at ease, eliminate any transportation challenges, and improve access to verification documents. Reviewers in this State generally did not feel safety concerns were an issue for home interviews, and SNAP QC management felt strongly that any contact with local offices should be avoided to maintain the integrity of the QC review process.

Languages Other Than English. Interviews were occasionally conducted in languages other than English, and QC staff did not find language barriers to be a problem for completing reviews. For non-English interviews, reviewers reported using the "Language Line" (a language translation phone service provided by the State), a bilingual reviewer or an interpreter provided by the household. A large majority of managers surveyed (80 percent) felt their reviewers had sufficient resources to conduct reviews in languages other than English.

Variation in Household Interviews by State Completion Rate Group

Reviewers in States with high completion rates were more likely to report making home visits to clients than reviewers in other States.[39]

A slightly larger proportion of reviewers in States with high completion rates reported at least occasional safety concerns: 56 percent, compared to 46 and 51 percent of reviewers in States with low and average completion rates (figure 3.3). This is consistent with the finding that States with high completion rates were also more likely to conduct home visits.

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[38] Reviewers in all site visit States reported conducting interviews over the phone in cases where the benefits were less than $100.

[39] This pattern is based on data collected during interviews in site visit and pretest States and from some survey respondents. The survey did not ask specifically about location of interviews, although some survey respondents discussed interview location in the open-ended comment field at the end of the survey.

Figure 3.3. Percentage of SQCRs That Report Safety Concerns at Least Occasionally Affect Ability To Contact or Locate a Household by State Completion Rate Group
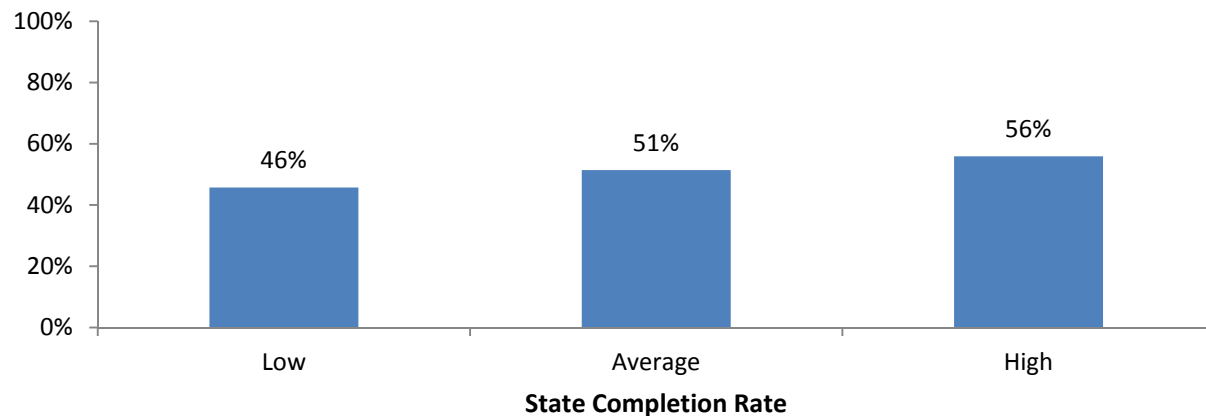
Source: Survey of State Quality Control Reviewers

4. Nonresponse Follow-Up Strategies

Clients frequently are difficult to reach and even once located may miss interview appointments. In these cases, additional actions may be necessary to complete the review. This section describes the mode of contact and methods to ensure client cooperation.

Reaching Clients. Mail and phone were the primary methods reviewers used to contact clients; these methods were used by 99 and 96 percent of surveyed SQCRs, respectively. About half of reviewers surveyed used certified mail at least sometimes (49 percent).

Reviewers in site visit States varied in the frequency of using certified mail. Reviewers in two States (including one State with a low completion rate and one State with a high completion rate) used certified mail whenever a household missed an appointment. SQCRs in two other States occasionally sent letters by certified mail, but the practice was not standard. Two States no longer permitted the use of certified mail during the review process because of the cost. Some review staff in these States noted it would be helpful to go back to using certified mail.

Sixty-two percent of SQCRs surveyed reported reaching out to neighbors to contact difficult-to-reach clients. Among those who did not seek information from neighbors, reasons included safety concerns (40 percent), lack of cooperation by neighbors (38 percent), and "other" reasons (54 percent). In States where most interviews were conducted in local SNAP offices or other public locations, "other" reasons may have included the lack of visits to clients' homes where reviewers would have had an opportunity to speak to neighbors.

Text messaging was reported by only 9 percent of SQCRs surveyed. The reasons most often given for not using text messages were SQCRs' inability to receive messages (42 percent) and lack of State or Federal approval (39 percent). Not all States provided cell phones to reviewers, which may account for some of those who reported an inability to receive messages.

Ensuring Client Cooperation. Once contact with the client was established, reviewers reported relative ease in obtaining household cooperation. Many SQCRs emphasized to clients that the purpose of the review was to ensure the clients received the correct amount of benefits they were entitled to receive, and that the review served to double-check the work done by the State agency.

Survey respondents report that three of the most effective strategies for obtaining household cooperation included notifying the client that noncooperation results in termination of benefits (reported by 48 percent of SQCRs surveyed), offering alternative interview locations (27 percent), and offering flexible interview times (18 percent).

Our profession is civil servant. We serve [people] in the State of [State name]. They're the ones who need the help and need the food. If we didn't care, we wouldn't be doing this job … Our job is to check to make sure everything's being done correctly. The bottom line is that we want make sure the client has enough food for the month.

—State SNAP QC Interview Respondent

SNAP benefits may be terminated if a household can be shown to have deliberately refused to cooperate with the SNAP QC process. For example, if a reviewer shows that a client who missed an appointment knew the appointment had been scheduled (e.g., by confirming the appointment with the client verbally or with a signed certified mail receipt), reviewers typically classified the client as *refusing* to cooperate and notified the local office that the client's benefits should be terminated.[40] However, benefits cannot be terminated if the SQCR is not able to contact the client successfully. In these cases where the reviewer cannot confirm the client was aware of an interview appointment, the household is typically classified as *failing* to cooperate.

Practices appear to vary somewhat by State, however. Reviewers in one State classified cases as *refusing* to cooperate only if they explicitly refuse to participate. Clients who miss an interview in this State were considered as failing to cooperate, even if they spoke with the SQCR and were aware of the appointment.[41]

Variation in Nonresponse Follow-Up Strategies by State Completion Rate Group

Reviewer efforts to follow up with clients varied across States: Reviewers in States with high completion rates tended to use a wider array of strategies and greater persistence to reach clients than did reviewers in States with low completion rates. They were, for example, more likely than reviewers in other States to reach out to neighbors and to use certified mail as strategies to reach clients (figure 3.4). Use of other strategies, such as phone and text messaging, was relatively more similar across reviewers from the three groups of States.

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[40] In such instances, clients often contacted their local offices and/or QC reviewers following the loss of benefits and offered to cooperate with the review to get their benefits reinstated.

[41] The likelihood of submitting a case as complete in these situations depends on how much time remains in the review period between benefit termination (and subsequent willingness to cooperate by the client) and the deadline for the State to submit the QC case to FNS. Termination of benefits near the end of the State's review period, for example, is unlikely to result in the client cooperating with the review in time for the State to submit the findings to FNS within their deadline. States, however, may complete cases previously submitted as incomplete if the client cooperates before the end of the review year.

Figure 3.4. Percentage of Reviewers Reporting Various Strategies for Contacting Clients by State Completion Rate Group
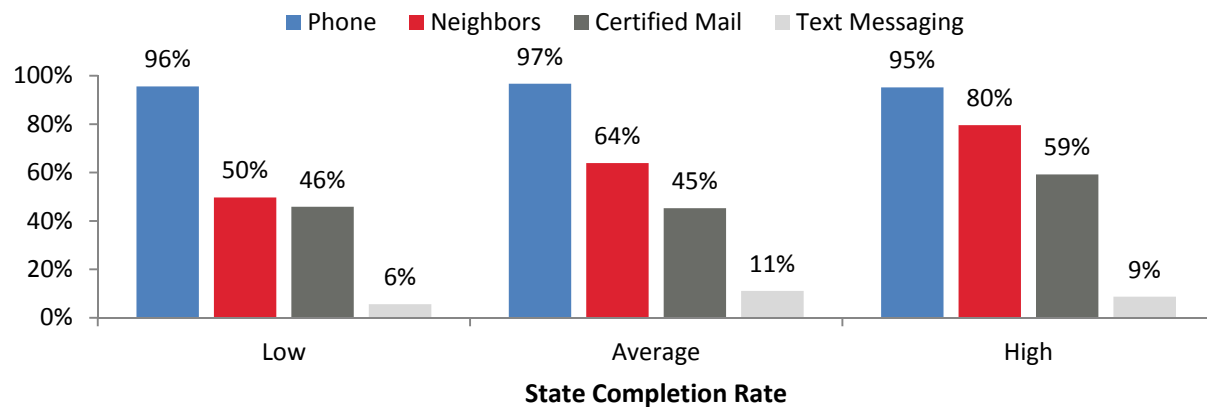
Source: Survey of State Quality Control Reviewers

While 71 percent of all surveyed reviewers reported they are strongly encouraged to make more than two attempts to contact clients, those in States with high completion rates were more likely to report such encouragement. About 84 percent of these reviewers reported strong encouragement compared to 70 percent and 65 percent of those from States with low and average completion rates, respectively (figure 3.5).

Figure 3.5. Percentage of SQCRs Reporting Strong Encouragement for More Than Two Attempts To Contact a Client by State Completion Rate Group
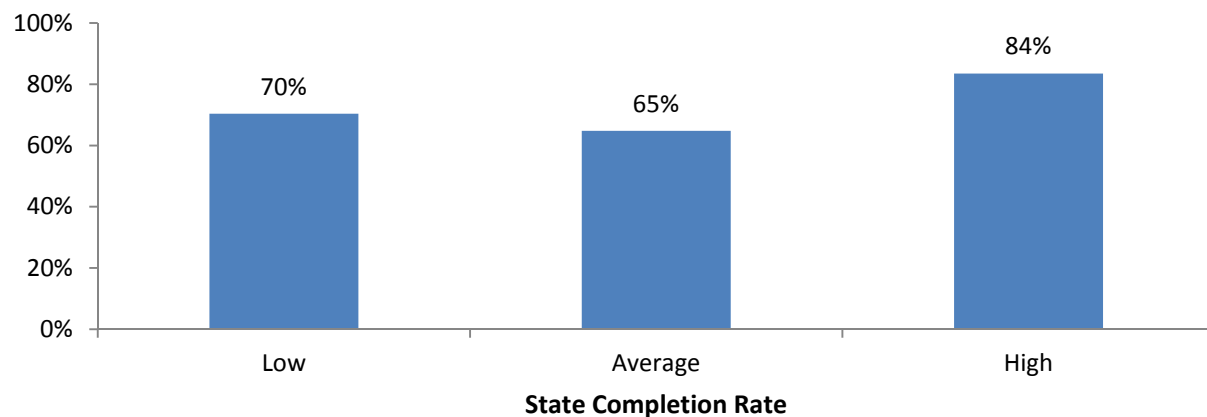
Source: Survey of State Quality Control Reviewers

Similarly, reviewers surveyed in States with high completion rates were more likely to report they could almost always turn missed appointments into completed reviews: 44 percent did so, compared to 29 percent and 21 percent of reviewers in States with low and average completion rates, respectively (figure 3.6).

Figure 3.6. Perceived Frequency of Turning Missed Appointments Into Completed Reviews by State Completion Rate Group

Legend: ■ Almost always ■ Often

State Completion Rate	Almost always	Often
Low	29%	43%
Average	21%	50%
High	44%	38%
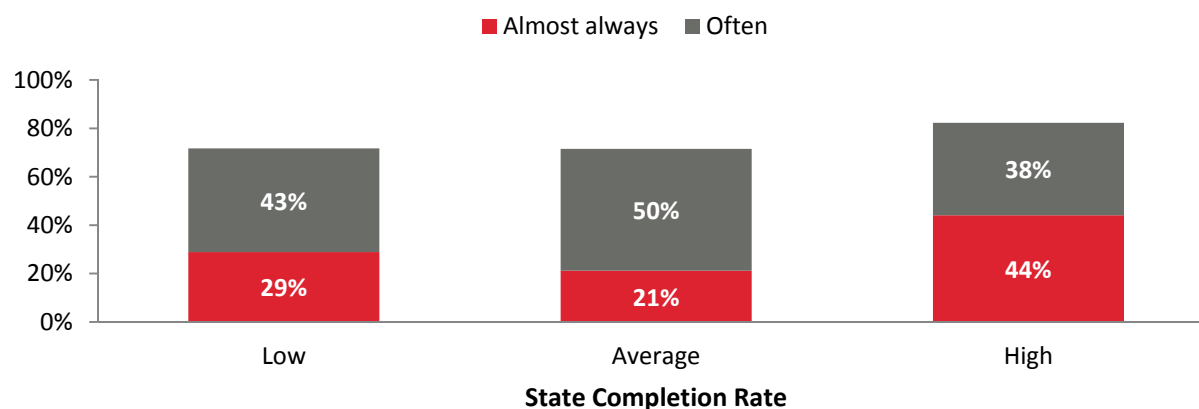
Source: Survey of State Quality Control Reviewers

Consistent with these results, efforts to contact households varied dramatically across—and sometimes within[42]—the six site visit States. Reviewers in the three States with low completion rates, for example, typically made fewer attempts to contact clients. Relative to reviewers in States with high completion rates, reviewers in States with low completion rates were more likely to submit a case as incomplete when unable to locate the client (e.g., failing to cooperate), rather than to make additional contact attempts. For example, reviewers in one State with a low completion rate cited the *FNS 310 Handbook's* requirement of making at least two contact attempts and not needing to do more.

Table 3.1 compares the typical steps taken to contact a client in one State with a high completion rate and one with a low completion rate. In State A, procedures included mailing two letters and making two phone calls to the client, followed by a contact attempt by a supervisor and the FNS Regional Office. In State B, SQCRs reported making 10–15 attempts to reach a client using various means, including making several phone calls, mailing up to 4 letters (including some by certified mail), and making unannounced home visits.

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[42] Within one State, for example, one reviewer reported "hounding" clients and making "as many calls as it takes" to reach them, while another person reported making no phone calls to clients at all.

Table 3.1. Comparison of Typical Approaches To Contacting Clients Across Two States

State A: Low Completion Rate	State B: High Completion Rate
1. Send an initial appointment letter and make two attempts to reach the client by phone (e.g., to confirm the interview prior to interview, to reach the client following a missed appointment)	1. Mail letter to the client notifying that his or her case has been selected for QC review and that a reviewer will contact him or her
2. Send a second appointment letter if the client misses the first appointment	2. SQCR calls the household to set up an appointment (usually several phone attempts)
3. A QC supervisor calls the client	3. If unable to reach the client by phone, mail a second letter requesting the client call the reviewer
4. The QC supervisor requests the FNS Regional Office send the client a letter	4. If the client does not respond to the letter or calls, make an unannounced home visit
5. The case is coded as incomplete (if the client was aware of the missed appointment, the household's benefits are terminated)	5. If the client is not home, mail two letters—one by regular mail and one by certified mail—informing the client of the penalties for not cooperating with the QC process
	6. If the client does not respond within 15 days, the case is coded as incomplete (if the client was aware of the missed appointment, the household's benefits are terminated)

Reviewers in States with high completion rates frequently reported searching for contact information online (e.g., through a search engine such as Google, Web sites such as 411.com, whitepages.com), contacting the U.S. Post Office to confirm the address of clients, visiting the household, and/or contacting neighbors to try to reach the clients.[43] Reviewers in States with high completion rates also used creative ways to identify new contact information for households (see text box).

Selected Innovative Strategies Used by Reviewers In States with High Completion Rates to Locate Clients

- Look up the client's mother using birth certificate data and contact her to find out how to reach the client
- Look for alternate contact information in arrest records
- Look up old phone numbers in library phone books
- Call other States for information in their client records
- Call former employers and ask for clients' emergency contacts
- Call children's schools
- Search under bridges for homeless clients
- Call retailers frequented by the client, as identified by EBT records

5. Obtaining Documentation From Collateral Contacts

Following the interview, reviewers frequently needed to obtain additional documentation; for example, to verify household composition from a collateral contact such as a landlord, or in some cases a neighbor or other source. Several reviewers reported verifying income from employers at this stage, while others requested that clients obtain and provide the documentation themselves. In some cases, reviewers used collateral contacts to gather all the information necessary to complete reviews even when the client did not participate in an interview.

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[43] A minority of reviewers in States with low completion rates also reported using these methods, although these practices were less uniform across reviewers within these States.

Similar to patterns in contacting clients, reviewers' efforts to reach collateral contacts were typically greater in States with high completion rates. This was most apparent with respect to when and how such efforts were made. For example, reviewers interviewed in one State with a high completion rate reported contacting collateral contacts by phone or email as soon as the household interview was conducted (or missed), rather than waiting for the client to collect the information. Some reviewers in States with high completion rates encouraged households to contact employers, landlords, or others during the interview itself to obtain information more quickly and convey the client's permission to release the information, if needed. Reviewers noted that when they received information verbally, they typically requested the collateral contacts to follow up in writing.

In contrast, reviewers in two States with low completion rates typically relied on clients to collect and deliver information from collateral contacts. Respondents in one State reported State law prohibited reviewers from collecting information from third parties without an explicit consent form signed by the household. Such a constraint seriously limited their ability to verify case information independently, particularly in cases where clients did not show up for the interviews.

6. Case Processing

This section describes the steps SQCRs take when a case has either been completed or all steps have been exhausted in trying to locate or interview the household.

Documentation of Findings and Error Determination. Once all the information has been gathered, reviewers document all findings in the *FNS-380* form and analyze the information, a process which some reviewers reported could be time-consuming. For each element on the *FNS-380* form, reviewers must determine whether information for the certification month and the review month matches or whether a variance is present. Based on the review information for each element, the SQCR calculates the benefit amount the household is eligible for in the sample month (referred to as "Comp 1") and compares that amount to the actual amount authorized by the eligibility worker. If the difference between these two amounts is $37 or less, the case is found to be correct (or not in error). This finding applies even if differences in individual elements are larger than the $37 threshold.[44]

If the overall difference is greater than $37, a second computation is calculated. This computation removes from consideration any differences between the certification month and the review month that are acceptable under the State's policies (referred to as "Comp 2"). For example, if a household with a simplified reporting requirement has a change in income that does not increase the household income above 130 percent of the poverty guideline, the new income can be excluded from the calculation of the appropriate benefit level in Comp 2. If the new calculation also results in an overall difference of more than $37, the case is considered to be in error. The lower of the two calculated difference amounts is treated as the final payment error amount.

Until a few years ago, one strategy used by some States to complete cases without full documentation was to make error determinations based only on the certification month (Comp 2) in cases where some information was missing for the review month (Comp 1). However, respondents noted recent FNS

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[44] A variance in one element may produce a difference larger than $37, but be offset by a variance in another element that results in a net difference of less than $37.

guidance called for completing both Comp 1 and Comp 2 to submit the case as complete.[45] Comp 1, however, may be completed using the likely conclusion standard, if applicable. Still, reviewers in multiple States noted this change increased their number of incomplete cases.

Use of Likely Conclusion. In cases where full documentation of eligibility criteria is unavailable but a reasonable assumption can be made based on other verified information, the reviewer is authorized to draw a "likely conclusion" to complete the review. Slightly more than half of SQCRs surveyed reported using likely conclusion for 1–5 percent of their cases. Ten percent reported never using likely conclusion, while 17 percent reported using it for more than 10 percent of their cases.[46]

Disposition of Incomplete Cases. If the reviewer is unable to collect the necessary documentation and is unable to complete the case using likely conclusion, the case is designated as incomplete. For these cases, reviewers typically documented their efforts to complete the case (e.g., dates, means of each contact attempt) under relevant elements in the 380 worksheet, separately in a narrative format, or in a workflow management system,[47] and described why the case is being designated as incomplete.

Types of *FNS-380* Tools Used by Reviewers. The type of *FNS-380* worksheet used by reviewers varied across States, with some using an electronic version (including the automated *FNS-380* developed by FNS) and others using manual versions (i.e., entering information by hand). Approximately two-thirds of reviewers surveyed (69 percent) reported using the automated *FNS-380*. Among them, approximately half (51 percent) reported no change in the ease of the SNAP QC process, while 40 percent thought it made the process easier.

Reviewers interviewed in one State reported the recent transition to the automated *FNS-380* improved their review process substantially; the previous system had been riddled with technical problems and would occasionally stop working and/or lose data, requiring reviewers to spend time reentering lost information. Reviewers interviewed in another State reported using a State-developed tool rather than the automated *FNS-380* form; benefits of the internal tool included greater automatic population of fields from the State's integrated systems.

Variation in Case Processing by State Completion Rate Group

A somewhat higher proportion of reviewers in States with high completion rates (83 percent) used the automated *FNS-380* form compared to reviewers in States with average and low completion rates (58 and 72 percent, respectively).

7. Secondary Reviews of QC Findings

Second-Party Reviews. Once the reviewer completed work on a given QC case, a second party typically reviewed the case before it was submitted to FNS. In some States, case files are submitted to the supervisor for review electronically, but in other States, the paper file is mailed to the supervisor. A large

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[45] Communications with FNS staff indicated this guidance was issued verbally during meetings with States in the early- to mid-2000s requiring that, in accordance with the *FNS 310 Handbook*, both Comp 1 and Comp 2 be completed to submit a case as complete.

[46] Forty-one percent of FQCRs surveyed reported that States in their caseload used likely conclusion to complete cases at least once a month.

[47] A workflow management system allows users to store, manage, and review files associated with that case review, similar to a SharePoint system. A supervisor located in a different part of the State, for example, can at any given time track a reviewer's progress on a given case, access associated files (e.g., case record, verification documents collected, FNS 380 worksheet), and provide a secondary review of findings.

majority of managers surveyed (86 percent) and staff in each site visit State reported all cases received a second-party review. This typically was conducted by a QC supervisor or coordinator.[48] In some States, the QC directors also reviewed a subset of cases, following the supervisor or coordinator review.

QC managers interviewed in three States reported all incomplete and NSTR cases received an additional level of review beyond the SQCR and supervisor's reviews. In two of these States, a supervisor or the QC director provided the additional review, while the third State convened a weekly teleconference to discuss possible ways to complete the cases.[49]

Error Review Conference Calls. Staff in five of the six site visit States reported convening a group of individuals weekly, biweekly, or monthly to discuss cases found to have errors. Typically, the QC director, supervisors, and a representative from the policy office participated in the conference calls. The calls included reviewers, representatives from local or State regional SNAP offices, and/or consultants hired by the States for assistance in improving error rates.

The focus of these discussions varied somewhat across the States. Topics in one State included the previous month's error rate, trends observed by QC staff in errors, and/or corrective actions for preventing future errors. The other four States focused on errors in individual cases under review at the time of the call.

State staff also used the discussions to provide quality assurance of the error findings and to brainstorm ways to mitigate the errors within the bounds of current policies. One example of the latter was to incorporate nonreimbursed medical expenses for elderly cases that then offset the observed error. The strategy potentially eliminated or reduced the error below the reportable threshold. Respondents indicated, however, that these discussions seldom led to changes in error findings.

Local Office Review. Prior to submitting QC review findings to FNS, all six site visit States provided relevant local offices an opportunity to rebut the findings of error cases (or all cases in some States). The State's QC staff then upheld or overturned the error based on the local office response and any new information.

Variation in Secondary Reviews of QC Findings by State Completion Rate Group

States with low completion rates more commonly held error review calls than States with high completion rates.

8. Transmittal to FNS

The last step in the State QC Review Process was to transmit the final case review findings to FNS through the online SNAP QCS. States must submit review findings within the allotted 115 days, or they lose the opportunity to arbitrate cases, should their findings conflict with those from Federal re-reviews. Among the six site visit States, the SNAP QC director typically provided the final approval of case findings before they were transmitted.

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[48] No reviewer reported providing second-party reviews of another reviewer's case.
[49] Note that incomplete cases could still be completed throughout the review year if, for example, nonresponsive clients contacted the QC reviewer after the case had already been submitted to FNS.

B. Incomplete Cases

State SNAP QC staff were asked specifically about the reasons for incomplete cases (section 1) and their perceptions of whether and how those reasons had changed over time (section 2). Survey results for this section appear in appendix tables B.2a and B.2b.

1. Reasons for Incomplete Cases

The most common reason reported for recent incomplete cases was failure to cooperate (52 percent), followed closely by refusal to cooperate (48 percent; figure 3.7). The vast majority of incomplete cases stemmed from lack of cooperation by SNAP households rather than collateral contacts; for example, 45 percent of recent incomplete cases stemmed from client refusal to cooperate, compared to only 3 percent from a collateral contact refusal to cooperate.[50] Incomplete reviews may also have resulted from an inability to locate the case record, but this was rare. These results were consistent across completion rate groups.

Figure 3.7. SQCR Reported Reasons for Most Recent Incomplete Cases
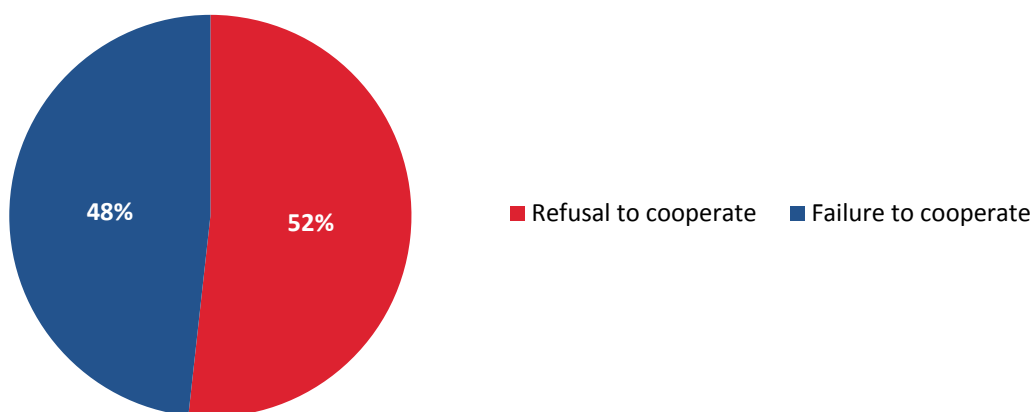
Source: Survey of State Quality Control Reviewers

2. Change Over Time in Incomplete Cases

State QC staff reported whether and how lack of client cooperation had changed over time. Their perceptions are summarized in this section.

Types of Incomplete Cases. Close to two-thirds of SQCRs (64 percent) observed no change over time in the frequency of either type of noncooperation associated with incomplete reviews (see figure 3.8). However, among those reporting a change, most indicated an increase in both failures to cooperate and refusals to cooperate. Results are similar across the three categories of State completion rates.

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[50] A case may be incomplete if the client cooperates with the review, but a collateral contact does not cooperate with providing necessary documentation.

Figure 3.8. SQCR Perceptions of Change Over Time in Types of Incomplete Cases Among SQCRs With at Least 5 Years of Experience With SNAP QC
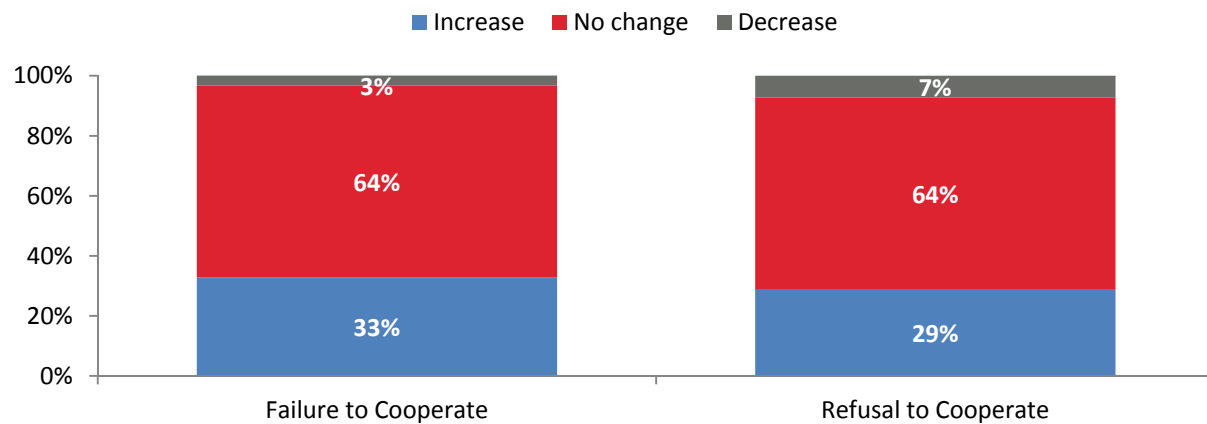
Source: Survey of State Quality Control Reviewers

Challenges Locating Clients. Changes over time in the ease or means of reaching clients may also affect the likelihood of case completion. About 33 percent of surveyed SQCRs reported increasing difficulty in locating clients. The most common reasons reported were more disconnected phone numbers (88 percent) and a larger homeless population (55 percent; figure 3.9). SQCRs also noted more returned mail (49 percent), less cooperation from collateral contacts (41 percent), and an increase in incorrect addresses (37 percent) contributed to a growing number of clients who could not be located.

Figure 3.9. SQCR Perceived Reasons for Increased Difficulty Locating Clients
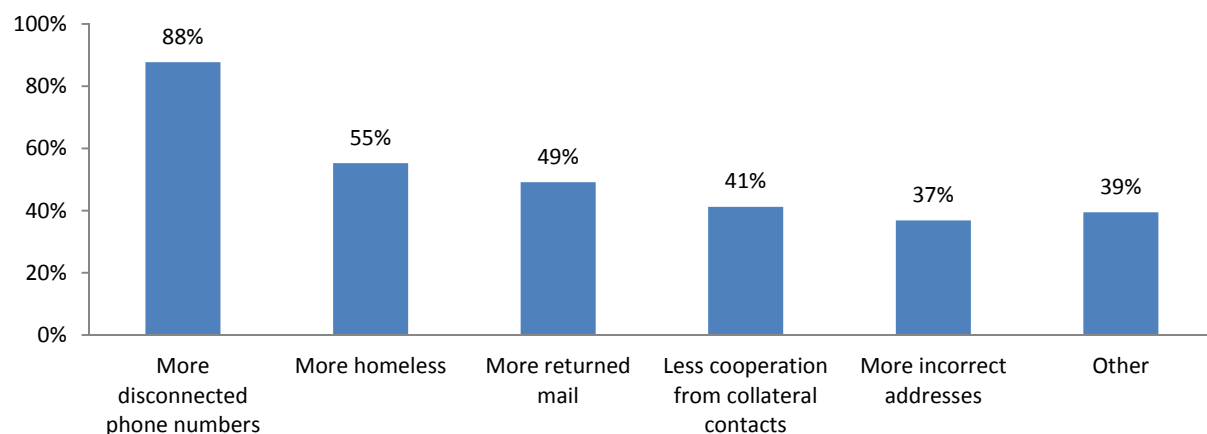
Source: Survey of State Quality Control Reviewers

Number of Contact Attempts Necessary To Complete Cases. Increases over time in the number of contacts necessary to successfully reach a client and collect sufficient information to complete a case may also have affected overall completion rates. Although the majority of SQCRs (60 percent) reported no such change over time, 49 percent reported seeing an increase. Reviewers in States with low completion rates were slightly less likely to report an increase in the number of contact attempts necessary to complete a case than those in States with average and high completion rates (figure 3.10).

Figure 3.10. SQCR Perceptions of Change Over Time in the Number of Contact Attempts Necessary To Complete a Case Review by State Completion Rate Group Among SQCRs With at Least 5 Years of Experience With SNAP QC
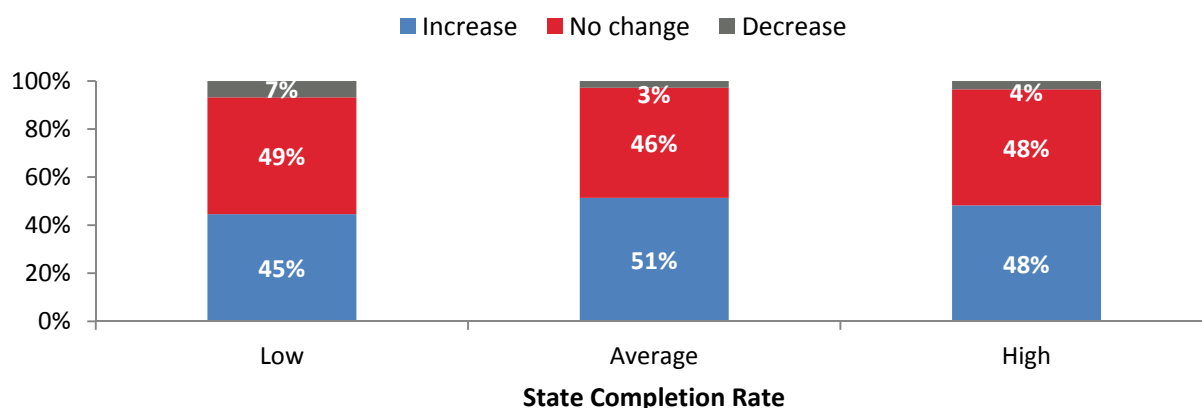
Source: Survey of State Quality Control Reviewers

C. State SNAP QC Staff

Both the quantity and quality of staff resources may influence the frequency of incomplete reviews. This section provides an overview of the tenure, workloads, training, and oversight of State SNAP QC reviewers. Detailed survey results for this section appear in appendix tables B.3 and B.4.

1. Staff Size

State QC directors reported a mean of 13.1 SNAP QC reviewers on staff. Although the QC sample sizes across States were somewhat similar, staff sizes varied considerably. Roughly one-quarter of directors (27 percent) reported 10 or fewer SQCRs in their State, while nearly one-third reported staff of 15 or more SQCRs. Overall, a large majority of directors and supervisors (83 percent) felt their staff size was sufficient to produce quality results; this was similar across completion rate groups.

Variation in Staff Size by State Completion Rate Group

Almost 43 percent of directors in States with high completion rates cited an increase in the size of their QC staff over the previous 5 years, while the percentage of directors in States with low and average completion rates that reported increases was measurably smaller: 23 and 7 percent, respectively (figure 3.11).

Figure 3.11. SNAP QC Directors' Perceptions of Change in Number of SQCRs in Previous 5 Years by State Completion Rate Group
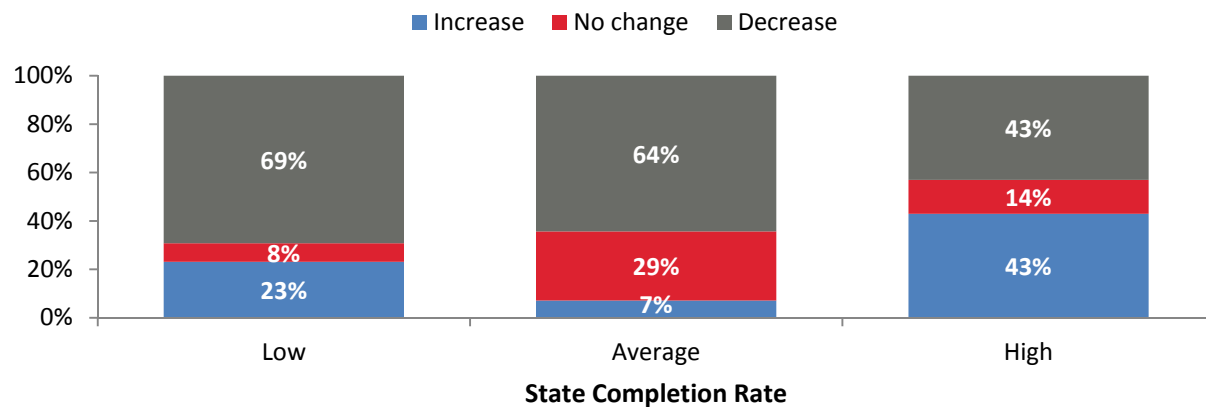
Source: Survey of State Quality Control Managers

2. Staff Experience

Experience With SNAP QC. SNAP QC managers had an average of 13.1 years of experience in SNAP QC. Approximately one-quarter had 5 or fewer years of experience, while approximately one-third had more than 15 years of experience. As expected, SQCRs had fewer years of QC experience—an average of 7.8 years. Nearly one-half of reviewers (47 percent) had 5 or fewer years of experience, while only 13 percent had more than 15 years of experience.

Prior SNAP Experience. A large majority of SNAP QC staff had experience working with SNAP prior to their position in QC, including 84 percent of SQCRs and 85 percent of SNAP QC managers. Managers in site visit States reported that previous SNAP experience, typically as an eligibility worker, was a requirement for being hired as a QC reviewer. Similarly, many reported that familiarity with SNAP policy was a critical prerequisite to working in SNAP QC.

Variation in Staff Experience by State Completion Rate Group

SNAP QC staff in States with high completion rates had more years of SNAP QC experience on average than those in States with low or average completion rates (figure 3.12). Nearly half (48 percent) of managers in States with high completion rates had more than 15 years of experience, compared to one-third (33 percent) of those in States with low completion rates and one-quarter (25 percent) in States with average completion rates. Similarly, all managers (100 percent) in States with high completion rates worked in SNAP prior to QC, compared to 82 percent of managers in other States.

Approximately 21 percent of SQCRs in States with high completion rates had more than 15 years of SNAP QC experience, compared to 9 and 13 percent in States with average and low completion rates, respectively.

Figure 3.12. Mean Years of SNAP QC Experience by State Completion Rate Group
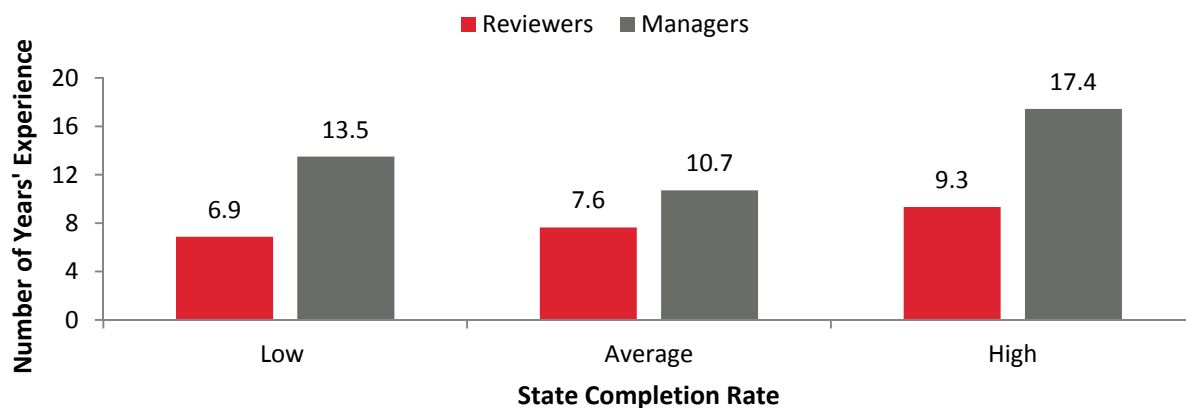
Source: Surveys of State Quality Control Reviewers and Managers

3. Staff Workload

SNAP QC Caseload. SNAP QC reviewers surveyed reported monthly assignments of 7.4 active cases and 5.6 negative cases on average. Caseload size varied across States, however; nearly one-third of reviewers (31 percent) reported five or fewer active cases the previous month, compared to 37 percent of reviewers with 9 or more cases. Among reviewers who had worked in SNAP QC for at least 5 years, 43 percent of reviewers reported no change over time in the size of their caseloads, while 40 percent reported caseloads had increased over time.

Additional Duties. Staff in some States had additional job duties outside of SNAP QC, including 42 percent of reviewers and 55 percent of managers. Reviewers in some States conducted QC reviews for programs other than SNAP, such as child care or TANF, while reviewers in other States specialized in SNAP QC only. Reviewers in some States also reported working on tasks other than QC reviews, including meeting with county offices, conducting various program review tasks, and working on special projects.

Variation in Staff Workload by State Completion Rate Group

SNAP QC Caseload. Average QC caseload sizes were somewhat consistent across SQCRs surveyed from States with low and high completion rates (7.0 active reviews and 7.8 active reviews, respectively). Results from site visit States, however, suggested higher SNAP QC caseloads among States with low completion rates and smaller caseloads in States with high completion rates. The difference between results from interviews and surveys may underscore the variation across States in QC caseload sizes.

Additional Job Duties. Staff in States with high completion rates were more likely than staff in States with average and low completion rates to have job duties in addition to their SNAP QC responsibilities. For example, 78 percent of State managers with high completion rates had additional job duties, compared to 53 percent of State managers with low completion rates (figure 3.13). Similarly, 57 percent of SQCRs in States with high completion rates had additional duties, compared to 34 percent of reviewers in States with low completion rates. This pattern makes it difficult to compare the overall workloads for staff in different State completion rate groups.

Figure 3.13. Percentage of Managers and Reviewers With Job Duties Outside of SNAP QC by State Completion Rate Group
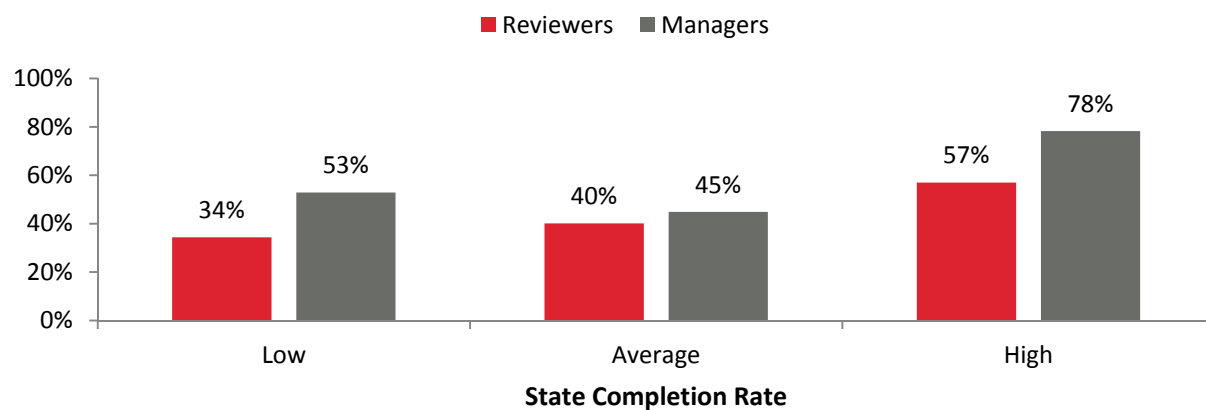
Source: Surveys of State Quality Control Reviewers and Managers

The opposite trend was found among SQCRs interviewed in site visit States, where overall workloads in States with low completion rates were generally higher than those in States with high completion rates. In one State with a low completion rate, for example, a reviewer reported an average monthly SNAP QC caseload of 10–13 active cases and 8–15 negative cases, along with 5–10 reviews for another State program.

In a second State with a low completion rate with a similar number of SNAP QC cases per reviewer, SQCRs were also responsible for conducting reviews each month for one to two other State programs, for meeting with county offices to follow up on corrective action plans, and/or for participating in special projects as requested by upper management. In the third State with a low completion rate, SQCRs conducted reviews only for SNAP, with no additional duties. Typical monthly caseloads included approximately 9–12 active cases and 7–10 negative cases.

In contrast, SNAP QC caseloads in the three States with higher completion rates tended to be lower, and reviewers were less likely to have other duties. Staff in two of the three States, for example, reported SNAP QC caseloads of 6–8 active cases and 3–5 or 4–7 negative cases. In each of these three States, SQCRs conducted reviews only for SNAP, and respondents in one State reported having an additional two staff members responsible for county management evaluations who were able to take on partial SNAP QC caseloads as needed.

Change in Caseload Over Time. Among SQCRs with at least 5 years of experience in SNAP QC, reviewers in States with low and average completion rates were somewhat more likely to report their SNAP QC caseload had increased over time: 40 and 43 percent, respectively, compared to 33 percent among SQCRs in States with high completion rates (figure 3.14). In contrast, SQCRs in States with high completion rates were most likely to report their caseloads had decreased in recent years: 26 percent, compared to 19 percent among SQCRs in States with low completion rates and 12 percent among SQCRs in States with average completion rates.

Figure 3.14. SQCR Perceptions of Change in SNAP QC Caseload Over Time by State Completion Rate Group Among SQCRs With at Least 5 Years of Experience With SNAP QC
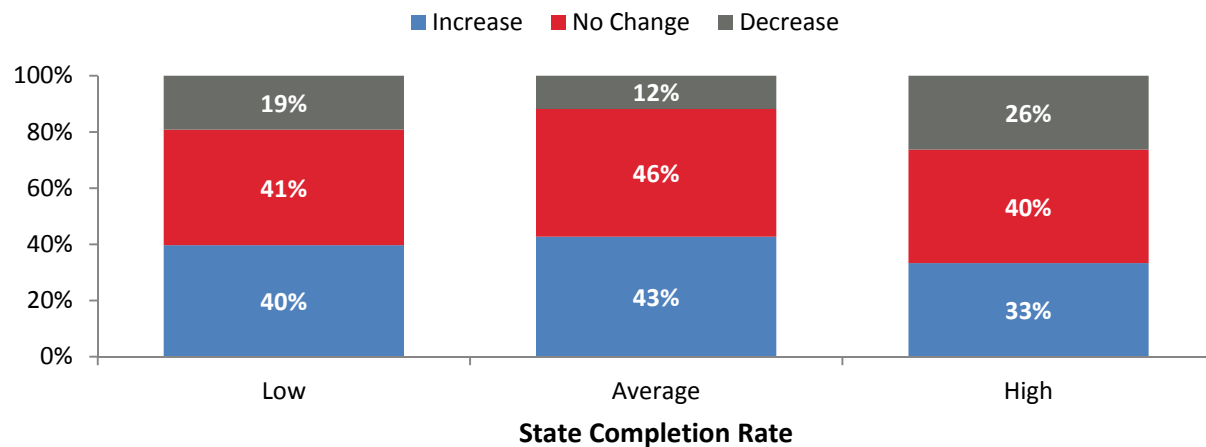
Source: Surveys of State Quality Control Reviewers

4. Training Provided to SNAP QC Staff

New SQCRs typically received an initial one-on-one training with a supervisor and then on-the-job training. Some States used a structured format with materials developed specifically for training new SQCRs, while others informally trained reviewers. The duration of training for new reviewers varied; for example, SQCRs in one State attended a 1.5-day training, compared to a 2-week intensive program of instruction in another State.

Because reviewers typically came in with prior SNAP experience, training focused on QC review procedures, with relatively less attention to SNAP policy. Each State reported covering the *FNS 310 Handbook* and procedures during training. Following training, new reviewers in some States accompanied an experienced reviewer on interviews and/or had another reviewer accompany them on their first reviews. In some States, new reviewers were assigned a lighter caseload in the first month(s), either fewer active cases or only negative cases.

SQCRs received ongoing instruction on policy changes or other emergent issues, typically in the form of an email from the QC director or supervisors. Reviewers in one State reported their State policy office broadcasted policy change notifications agency-wide by email. In-person or phone conferences were also used by QC management to share new information with reviewers.

Overall, SNAP QC staff received training on a wide variety of topics related to SNAP policy and SNAP QC review procedures, including the use of likely conclusion (reported by 73 percent of SQCRs), interview techniques (60 percent), and methods for locating households (52 percent). Some reviewers reported, however, that additional training would be helpful, particularly on complex issues outlined in the *FNS 310 Handbook* (reported by 50 percent), the use of likely conclusion (40 percent), State-specific policies (36 percent), and procedural components of QC reviews (34 percent).

The majority of reviewers (84 percent) reported receiving training from a QC supervisor or coordinator; 42 percent reported also receiving training from a QC director. One-quarter of reviewers (26 percent) received training from a third-party contractor.

Variation in Training by State Completion Rate Group

Eighty-two percent of reviewers from States with low completion rates reported that the frequency of training had stayed the same or decreased over time, compared to notably smaller percentages of reviewers from States with average or high completion rates. In contrast, 30–49 percent of reviewers from States with high and average completion rates, respectively, cited increases in the frequency of training (figure 3.15).

Figure 3.15. SQCR Perceptions of Change in Training Frequency by State Completion Rate Group Among SQCRs With at Least 5 Years of Experience With SNAP QC
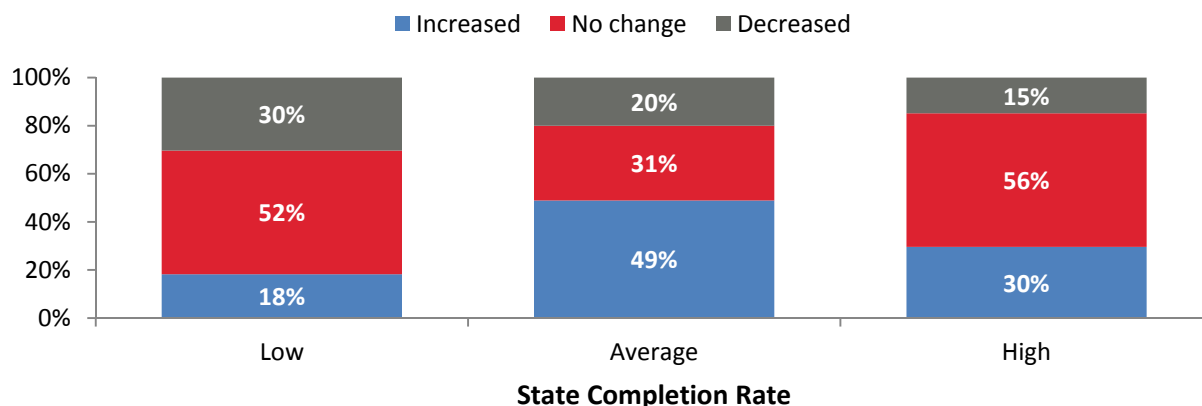
Source: Surveys of State Quality Control Reviewers

A larger proportion of reviewers from States with low and average completion rates received training from third-party contractors (33 and 26 percent, respectively) than those from States with high completion rates (13 percent; figure 3.16).

Figure 3.16. Percentage of SQCRs Who Received Training From a Third-Party Contractor by State Completion Rate Group
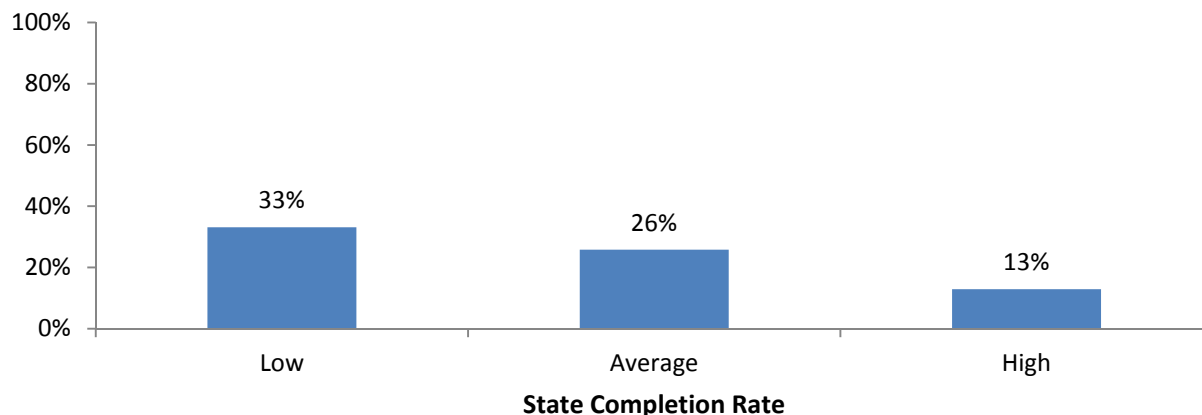
Source: Surveys of State Quality Control Reviewers

5. Oversight of SQCRs

Because supervisors, like SQCRs, are typically located throughout their State, ongoing communication between supervisors and staff often involved email, phone, and/or instant messaging. Reviewers reported relying on these methods to obtain feedback and troubleshoot cases as needed.

The extent of communication varied across States, however. At one extreme, reviewers in one site visit State reported biweekly videoconferences, semiannual in-person meetings, routine in-person visits by supervisors, and frequent contact by phone, email, and instant messaging. At the other extreme, reviewers in another site visit State reported very little ongoing communication, no regular phone calls, and one annual in-person meeting.

In five of six States visited, supervisors' roles included reviewing SQCRs' work on QC cases, training new reviewers, and providing general personnel oversight, such as monitoring staff performance. Three-quarters of surveyed managers (77 percent) monitored SNAP QC completion rates by reviewer. Interviews indicated that managers typically used this information to identify issues with individual reviewers and to troubleshoot accordingly as needed.

The majority of State SNAP QC managers reported confidence in the supervisory capacity of their SNAP QC staff. Three-quarters of managers (77 percent), for example, reported they had an adequate number of supervisors, and 92 percent reported supervisors had the resources needed to do their jobs effectively.

Variation in SQCR Oversight by State Completion Rate Group

Several reviewers in two of the three site visit States with low completion rates reported very little ongoing communication either between reviewers or with their supervisors. Reviewers in the remaining four States reported more regular communication with other staff or supervisors and/or regular meetings of all staff.

Slightly higher proportions of managers in States with high completion rates monitored completion rates by reviewer than did managers in States with low completion rates (figure 3.17).

Figure 3.17. Percentage of Managers Who Monitor Completion Rates by Reviewer
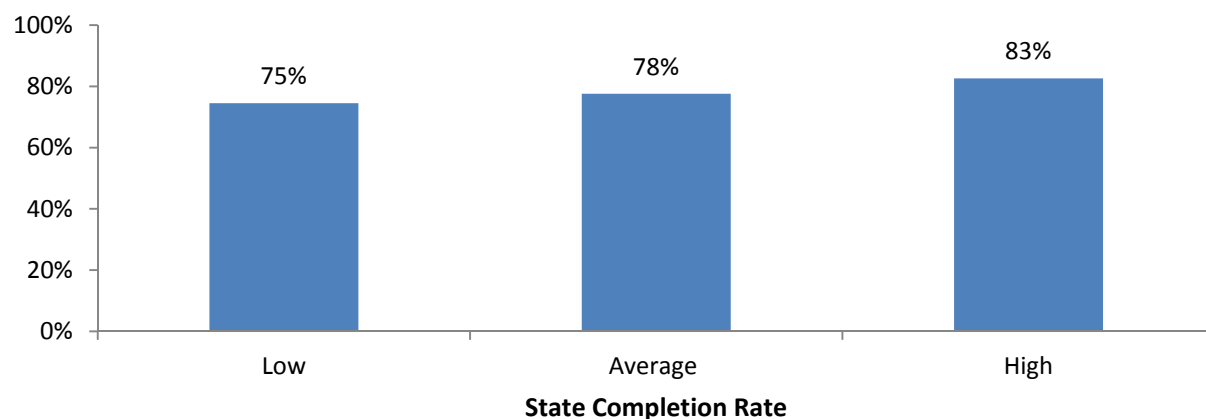
Source: Survey of State Quality Control Managers

Managers from States with high completion rates were somewhat more likely to report that reviewers in their States followed the same procedures to conduct reviews: 100 percent, as compared to 84 and 94 percent of managers from States with low and average completion rates, respectively (figure 3.18).

Figure 3.18. Percentage of Managers Reporting Reviewers All Follow the Same Procedures When Conducting Reviews by State Completion Rate Group
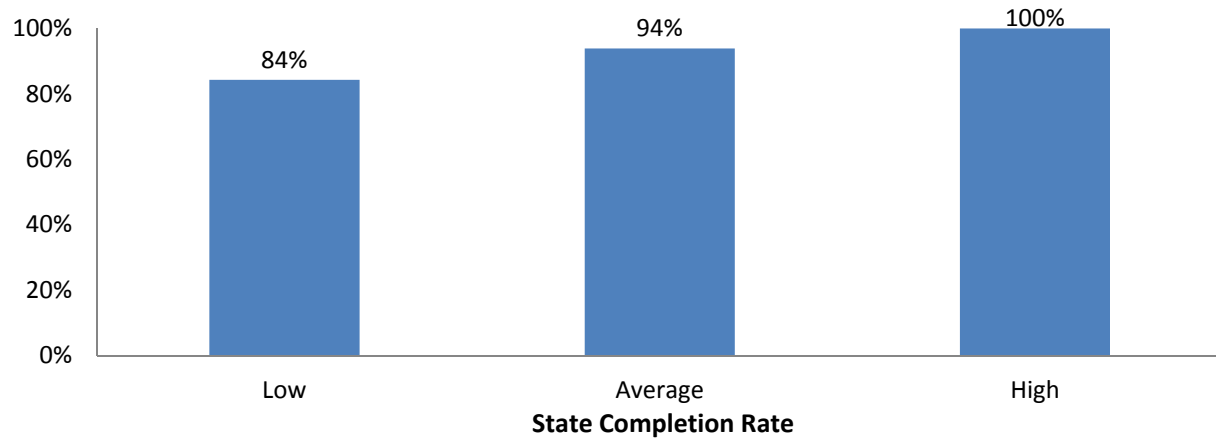
Source: Survey of State Quality Control Managers

Chapter 4. Federal SNAP QC Review Process

The Federal portion of the SNAP QC review process begins when a State transmits data to FNS through SNAP QCS. FNS's Regional Offices review all incomplete cases and NSTR cases, and a subsample of each State's complete active cases. This chapter examines the Regional Office review process from the time the office receives the cases from the States through the time FNS makes a final determination about each case.

Findings are based on semi-structured interviews with SNAP QC managers[51] and FQCRs from two Regional Offices and a survey of FQCRs from the other five Regional Offices. Percentages presented in the text and figures refer to survey results. Unless otherwise noted, results from qualitative interviews and the surveys were consistent. Section A of this chapter describes the Regional Office procedures for conducting SNAP QC reviews. Section B describes the experience, workload, and training of Federal SNAP QC staff. Detailed tabulations of survey results appear in appendix C.

A. Regional Office SNAP QC Review Process

Federal reviews are designed to ensure States are reviewing cases and applying SNAP policy accurately. This section discusses the steps involved in the Regional Office QC review process: case sampling and assignment to FQCRs (section 1), preparations for case review (section 2), the review process for active complete cases (section 3), the review process for active incomplete cases (section 4), secondary reviews of findings (section 5), and the resolution of disagreements between State and Federal reviews (section 6).

1. Case Sampling and Assignment to FQCRs

Sampling. Each month, FQCRs review all QC cases designated as incomplete or NSTR plus a subsample of active complete and negative cases for each State. This representative subsample is based on the size of the monthly QC sample of the State. The sample size typically ranges from 150 to 400 active complete cases per year and 75 to 160 negative cases per year per State, with each Regional Office reviewing cases for 5-10 States. The number of NSTR and incomplete cases varies substantially between States. In FY 2013, the annual number of NSTR cases ranged from 14 to 129 per State, and the number of incomplete cases ranged from 0 to 143.

Once review cases have been selected, the Regional Office requests the case files from the States. Most States provide an electronic case file, such as a PDF, but a few States mail paper case files to the Regional Office.

Case Assignment. The Regional Offices vary in how cases are assigned to FQCRs. One of the site visit Regional Offices assigns each FQCR to a single State, so the FQCR focuses exclusively on that specific State. This strategy makes case distribution straightforward and limits the amount of policy knowledge FQCRs must have across States. The other site visit Regional Office assigns multiple States to each FQCR so that individual States are reviewed by multiple FQCRs. The advantage of this strategy is that each FQCR can use at least one peer as a resource when questions or difficulties with State policy or QC practices occur. The second strategy is more common across the other Regional Offices; 79 percent of FQCRs conduct reviews for two or more States (see figure 4.1).

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[51] Branch chiefs and coordinators

One of the site visit Regional Offices assigns all incomplete cases to a single staff member with less experience than the FQCRs. Incomplete cases are thought to be relatively easy to review because it is not necessary to know the nuances of State policy or to recalculate benefit amounts. However, this strategy is relatively uncommon across Regional Offices: the vast majority of FQCRs surveyed (96 percent) reviewed incomplete cases in the past year, and more than four-fifths (83 percent) reviewed at least one incomplete case in a typical month.

Figure 4.1. Number of States in a Typical FQCR Caseload
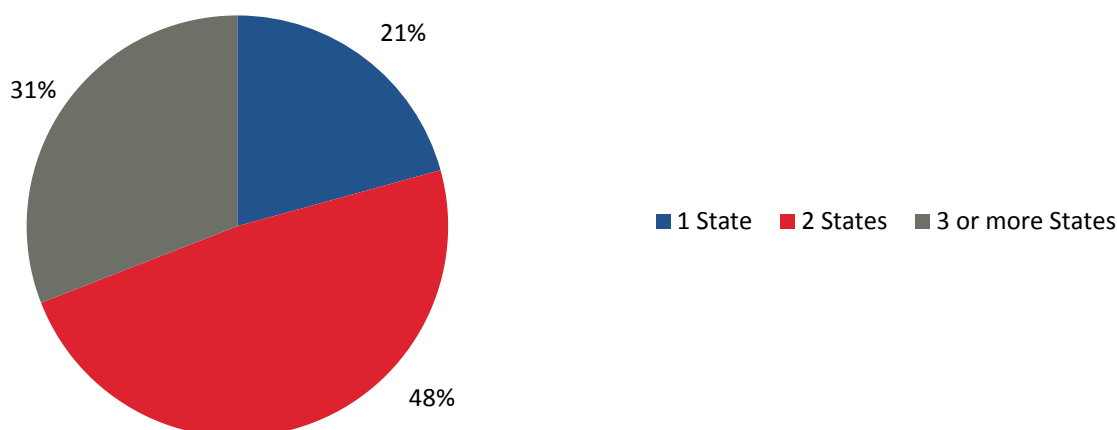
Source: Survey of Federal Quality Control Reviewers

Review Timeline. The Regional Office review period is 70 days per case. The actual time it takes to conduct a review varies from 30 minutes to a full workday, depending on the complexity of the case and whether all materials are initially available in the case record. Once all documents are available, however, most cases can be reviewed in less than 3 hours. Incomplete and negative cases typically take less time to review (less than an hour each) because they require fewer steps than active complete cases.

Surveyed FQCRs were almost evenly divided as to whether the amount of time available to complete all their reviews was sufficient (52 percent regarded the amount of time available as insufficient). Similarly, about half of FQCRs indicated the amount of time necessary to review a case had increased over the past 5 years. This may be in part because of the changes in steps and tools used to conduct reviews, as discussed in section 3.

2. Preparations for Case Review

The review process at the Regional Office level consists of a desk review, in contrast to the face-to-face interviews and field work conducted during the State reviews. The first step for FQCRs is to review the case file provided by the State to make sure it contains all the necessary documents. FQCRs rarely have access to State information systems and databases, so if documents are missing, the Regional Office must request them from the State.[52] FQCRs in one site visit Regional Office funnel all such communications through the Regional QC coordinator; at the other, FQCRs reach out directly to the main point of contact in each State. About two-thirds of FQCRs reported direct access to State systems

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[52] Only one FQCR reported having access to State systems.

and databases would be helpful as it would speed the review process and ensure that FQCRs have all relevant information for their review.

Most FQCRs (74 percent) reported the State files they receive for incomplete cases almost always or often contain all the necessary materials. Similarly, most FQCRs (81 percent) reported the cases files almost always or often included thorough documentation on the review procedure. Fifty-two percent of FQCRs, however, reported at least occasionally requesting additional information from the State for incomplete cases. These informal requests are made with the intent of completing the cases, if the missing information is available and sufficient to do so. Some FQCRs noted States are more cooperative about providing information when it appears the incomplete cases would be correct rather than when they would be deemed to have errors.

3. Case Review Process for Active Complete Cases

The goal of the Federal review is to determine whether the FQCR agrees or disagrees with the findings of the State. The desk review of complete active cases generally consists of an examination of the *FNS-380* elements, the computation sheets, and the verification documents. The steps for conducting reviews have changed in recent years, with one-third of FQCRs reporting the steps have changed to some extent and one-half reporting the steps have changed a lot. These changes were commonly attributed to new guidance and additional tasks from the FNS National Office. For example, one recently added task was the evaluation of the timeliness of application processing by the State.[53]

Changes were also attributed to the introduction of the automated *FNS-380* system. This online tool is based on an MS Access database and allows users to simultaneously review and document their findings directly in the system. The automated *FNS-380* is a substitute for the paper *FNS-380* form. The structure of the automated 380 requires FQCRs to review every element, not just those relevant to a particular case. Almost three-quarters of FQCRs always or often used the automated *FNS-380* in their reviews. Two-thirds of FQCRs reported the automated system did not affect the ease of conducting reviews, although some indicated the requirement to navigate through every field made conducting reviews more time-consuming.

FQCRs were asked about other materials used in the review process. Most stated they often use the *FNS 310 Handbook* and State-specific QC materials during the review process, but they rarely use the *FNS 315 Handbook*.

Once the review is complete, findings are entered into SNAP QCS. If the FQCR agrees with State findings, the review is considered complete, either at this point or after a secondary review (see section 5). If the FQCR disagrees with State findings, the case (referred to as a "disagree" case) is likely to receive a secondary review, and the Regional Office and State work formally or informally to resolve the differences (see section 6).

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[53] This timeliness measure refers to the initial processing of the application for certification or recertification; it does not refer to the timeliness of the State's QC process.

4. Case Review Process for Active Incomplete Cases

Reviewers use the same set of tools for incomplete cases as for complete cases, but reviews follow a slightly different process than reviews of complete cases. Rather than examining the individual data elements and the benefit calculations, reviewers focus on the narrative description of the process used by the SQCR and the available information in the case. The purpose of these reviews is to assess whether the case was correctly disposed of as incomplete.

The *FNS 315 Handbook* specifies that FQCRs "may take actions to complete the case and if the review is completed will report it to the State as a completed case" (section 230, pp. 2–5). However, it was uncommon for FQCRs to attempt to complete cases. In one of the site visit Regional Offices, FQCRs were discouraged from making phone calls to clients or collateral contacts in an effort to attempt to complete cases. In the other site visit Regional Office, FQCRs occasionally made phone calls to employers or landlords, but limited time and resources frequently precluded this type of effort. FQCRs in both site visit Regional Offices occasionally completed cases if they could do so without collecting additional information.

> ### On Completing Incomplete Cases at the Federal Level
>
> *It takes a lot of time. The clients are even more reluctant to talk to some stranger calling from [the Regional Office] about something they don't really understand than they would have been with someone from their own State. … It's not easy for us to complete a case.*
>
> —FQCR Interview Respondent

Federal QC staff viewed completing cases as a time-intensive activity. Almost half of FQCRs (48 percent) reported no attempts to complete a case during the past year and an additional 11 percent reported one or fewer attempts per year (see figure 4.2). The primary reasons cited were a lack of time and the absence of any requirement. Eleven percent of FQCRs, however, reported attempting to complete a case at least once a month. When FQCRs did take steps to complete cases, the most common methods were phone calls to collateral contacts or to the household. However, these efforts were seldom successful. More than three-quarters of FQCRs who made at least one attempt to complete a case during the previous year (79 percent) estimated that attempts to complete cases were successful less than one-quarter of the time.

FQCRs rarely formally disagreed with State dispositions of cases as incomplete and returned them for additional work. Instead, FQCRs were more likely to request additional case information informally during their review because formal disagreements tended to take substantially more time for the FQCR, QC coordinator, and branch chief. Some FQCRs reported it was more common to change the disposition of a case from incomplete to NSTR than it was to complete the case. Furthermore, some FQCRs who reviewed cases for States with relatively high completion rates indicated they believed that incomplete cases in those States could not be completed.

Figure 4.2. Frequency of FQCRs Attempting To Complete Incomplete Cases

- No attempts
- Less than once a year
- At least every 4–6 months
- At least every 2–3 months
- At least once a month

48%
11%
19%
11%
11%
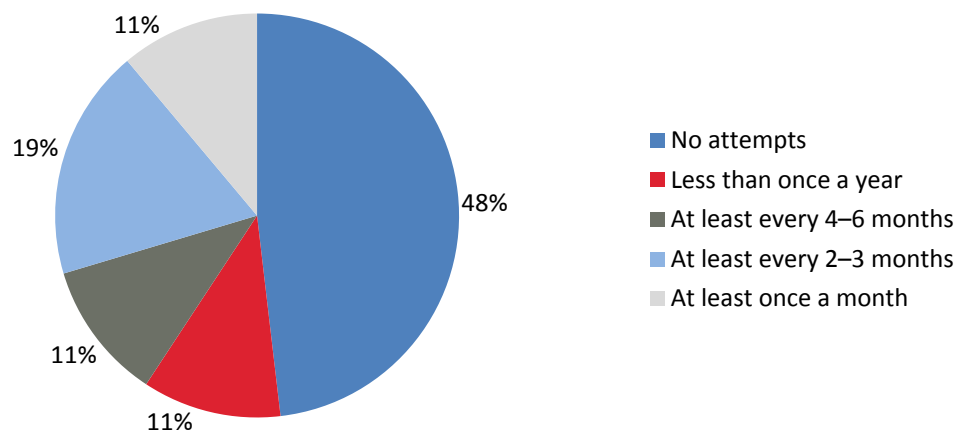
Source: Survey of Federal Quality Control Reviewers

5. Secondary Reviews of Findings

Once the FQCR finishes a review, a second party may review the case. This second-party review is most often performed by the QC coordinator; 73 percent of FQCRs reported their QC coordinator does these reviews, but FQCRs in one Regional Office (19 percent) reported another FQCR does so (figure 4.3).

The number and types of cases getting a secondary review varies across Regional Offices. The QC coordinator in one of the site visit Regional Offices reviewed all cases, while the coordinator in the other site visit Regional Office reviewed cases only where there was a disagreement (disagree cases) between Federal and State findings, citing a lack of time as the primary reason for limiting the number of secondary reviews. Most FQCRs in other Regional Offices (90 percent) reported that at least some cases received a secondary review. Cases subject to a secondary review often included disagree cases (62 percent) or a sample of all cases (69 percent).

Figure 4.3. Federal QC Staff Member Who Conducts Secondary Reviews

4% 4%
19%
73%

- QC director
- QC coordinator
- Another FQCR
- Other
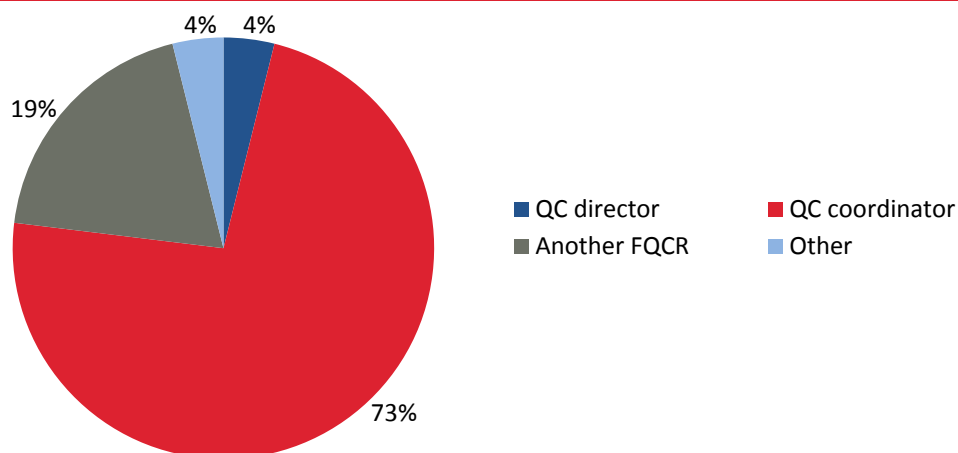
Source: Survey of Federal Quality Control Reviewers

6. Resolution of Differences Between State and Federal Findings

The Regional Offices convey their findings on all cases to the States through SNAP QCS. For cases where there is a disagreement, this system contains a few standard fields that inform the State which element or elements are the source of the disagreement. Typically, the Regional Offices also sends a letter to the State explaining the reason for the disagreement. Although the QC coordinator at the Regional Office is generally responsible for overseeing this communication, the FQCR who reviewed the case often drafts the letter. This letter typically includes a detailed description of the reason for the disagreement between Federal and State QC and references to documents in the case file and citations to the relevant policies.

The State then has 20 days to respond and to request formal arbitration if an agreement cannot be reached informally. Often, disagreements can be resolved informally over the telephone between the Regional Office QC coordinator and the State representative, and the resolution is documented in SNAP QCS. If the informal arbitration process is unsuccessful, the case moves to formal arbitration. FNS's Federal arbitrator has the final judgment on cases where the State and Regional Office disagree.

B. Federal SNAP QC Staff

Federal QC staff generally consist of a branch chief (or QC director), a QC coordinator, and 5–7 QC reviewers. QC staff usually work in the Regional Office, but a few work out of their homes or other locations. This section describes the experience, workload, and training of FQCRs. [54]

1. Staff Experience

About two-thirds of FQCRs surveyed had more than 5 years of experience in SNAP QC at the Federal level. A majority of the FQCRs had worked only at the Federal level, but 31 percent also had experience with SNAP QC at the State level. The FQCRs who participated in the survey generally had more experience than those at site visit Regional Offices, where 60 percent of FQCRs had fewer than 5 years' experience and none had experience in State SNAP QC.

2. SNAP QC Staff Workload

Each FQCR reviewed an average of 48 active cases and 28 negative cases each month. A majority of FQCRs (62 percent) indicated this represented an increase in caseload over the past 5 years. Additionally, FQCRs typically reviewed about 12 incomplete cases each month. About 40 percent of FQCRs described their current caseload of incomplete cases as an increase over the past 5 years, but 17 percent reported a decrease.

About one-third of FQCRs focus exclusively on SNAP QC reviews (figure 4.4). For the other two-thirds, additional duties typically include training, policy, and management evaluations for specific States, or QC reviews for programs other than SNAP.

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[54] The focus was on FQCRs; coordinators or directors were not included in the survey.

Figure 4.4. Percentage of FQCRs' Work Time Spent on SNAP QC Reviews
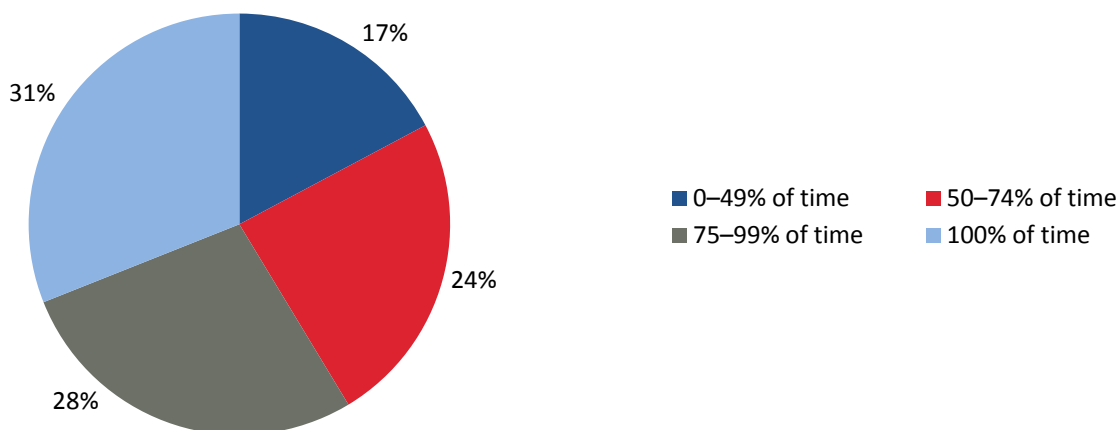
Source: Survey of Federal Quality Control Reviewers

FQCRs occasionally took on additional reviews to cover the workload of other reviewers on vacation or medical leave. Almost three-quarters of surveyed FQCRs reported this happened at least once per year. Otherwise, QC coordinators cover for absent reviewers, or the FQCR may accumulate a backlog.

3. Training Provided to Federal SNAP QC Staff

QC coordinators or other senior QC staff typically trained new QC reviewers, either individually or in small groups. Some FQCRs (45 percent) reported receiving regular, ongoing training or as needed. However, 17 percent of surveyed FQCRs reported not receiving training on how to conduct a SNAP QC review.

Training techniques included PowerPoint presentations, peer mentoring, and regular group discussions on policy changes and other developments related to QC. Some training consisted of self-directed review of handbooks and other policy materials and regulations. FQCRs most commonly received training on the *FNS 310 Handbook*, SNAP eligibility and certification policy, QC review procedures, and the use of likely conclusion to complete a case. Although three-quarters of FQCRs surveyed viewed the training they received as effective, 52 percent indicated the amount of training had decreased in recent years.

Changes in State policies often affect QC reviews for that particular State, so FQCRs need to keep up to date on the current State policies that pertain to their caseloads. FQCRs reported they received information from the Regional Office policy branch, the QC branch chief, and online resources. Some FQCRs at site visit Regional Offices indicated these sources were not always effective, and new policies sometimes came to light during the arbitration process.

Chapter 5. Characteristics of Incomplete Cases

The data collected during SNAP QC reviews and submitted to FNS form the basis of a national data file used internally by SNAP QC staff in the National Office for monitoring program integrity, including establishing the State and national error rates. An edited version of the data file is developed for public use. This public use SNAP QC database is a probability-based, national-level data file used for conducting research on the characteristics of the participant population. It contains only complete cases, and the data are not weighted to compensate for missing incomplete cases. This chapter explores how differences between complete and incomplete cases may or may not bias the QC research database due to under- or overrepresentation of cases with certain economic, demographic, or administrative characteristics.

This analysis uses administrative case file data for incomplete and complete active QC cases for a period of 3 years (from FY 2010 to FY 2012) from five States: Iowa, Kentucky, Mississippi, Ohio, and Oklahoma. These States represent a mix of those with high and low completion rates (see chapter 2 for details). This analysis compares the characteristics of incomplete SNAP QC cases to those of complete cases across all five States over this 3-year period to assess whether there are any systematic differences. Results were consistent across States unless otherwise stated. Section A describes the differences in the distribution of characteristics of complete and incomplete cases. Section B describes the potential influence of these differences on the distribution of characteristics in the overall QC database. Detailed results, including State-level results, appear in appendix D tables.

A. Differences in the Characteristics of Complete and Incomplete Cases

This section summarizes differences in the demographic, economic, and administrative characteristics of households between complete and incomplete SNAP QC cases across the five States. Brief discussion of trends consistent with qualitative study findings is included where available. The analyses focused on the characteristics listed in table 5.1.

Table 5.1. Variables Collected for Complete and Incomplete SNAP QC Cases

Demographic Information	Economic Information	Administrative Information
• Household size • Household composition, including presence of elderly and children • Age of household head • Metropolitan, micropolitan, or rural household	• Gross household income as percentage of poverty guideline • Presence and sources of earned and unearned income • Whether the maximum allotment was received • Benefit amount	• Type of most recent action that occurred prior to or during review month (i.e., new certification or recertification) • Date of most recent action • Whether the case review was completed

Source: Administrative data from five States
Notes: The following variables were requested from States but not included in this analysis because of difficulty across the States in providing complete information: race/ethnicity of household head, disability and ABAWD status, receipt of General Assistance, and State reporting requirements.

Key results are presented below for characteristics where the difference between complete and incomplete cases was greater than 5 percentage points. Characteristics with smaller differences are included in appendix D tables D.1–D.3.

1. Incomplete cases are less likely to have unearned income and more likely to have earned income

Overall, incomplete cases were much less likely to have unearned income and somewhat more likely to have earned income than complete cases (figure 5.1).[55] This may reflect the relative difficulty of verifying earned income during the SNAP QC process (e.g., obtaining paystubs from a client or confirmation from an employer). Interview data with SQCRs, for example, indicated that verifying earned income is more difficult because it requires the cooperation of the client (e.g. providing a paystub) or an employer (e.g., providing confirmation of the clients employment and earnings), while verification of unearned income is more readily available in State and Federal databases that reviewers can access directly.

Figure 5.1. Percentage of Households With Earned and Unearned Income by Review Completion Status
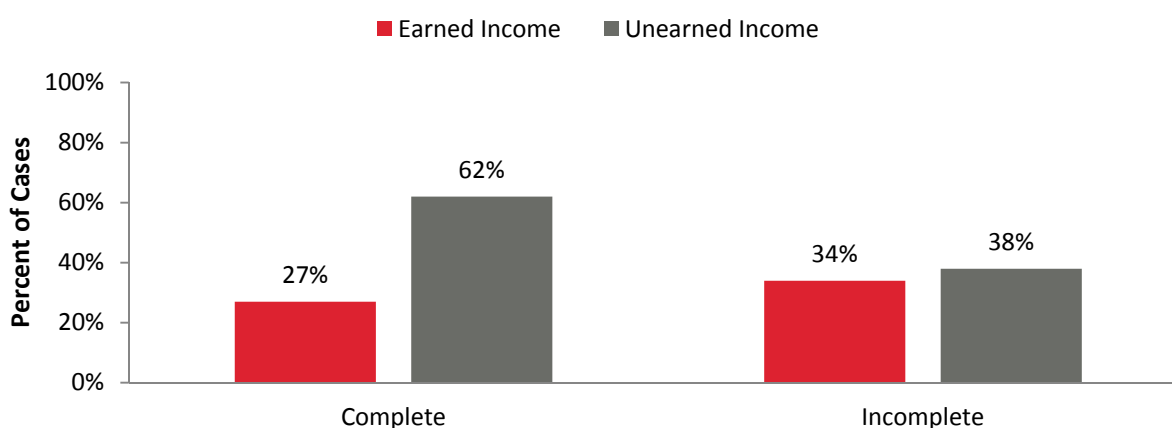
Source: Administrative data from five States

2. Incomplete cases include more households with zero income and receiving the maximum benefit level

Incomplete cases were much more likely than complete cases to have zero income: 37 percent of households among the incomplete cases had no gross countable income, relative to 20 percent of households in complete cases (figure 5.2). This may reflect relatively higher mobility among zero-income households, making it more challenging to locate and contact them for a QC review. Interviews with SQCRs, for example, indicated it can be difficult to locate a client without a permanent address (e.g. individuals who are living with friends or family on a short-term basis) or whose phone numbers have been disconnected.

Similarly, incomplete cases were more likely to receive the maximum benefit level: 43 percent as compared to 33 percent (figure 5.2). Substantial overlap exists between households with zero income and households receiving the maximum benefit level.

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[55] Iowa was not included in the analyses of levels or types of income because data on household income were not available for incomplete cases.

Figure 5.2. Percentage of Households With Zero Income and Receiving the Maximum Benefit Level by Review Completion Status

Zero Income ■ Maximum Benefit Received ■
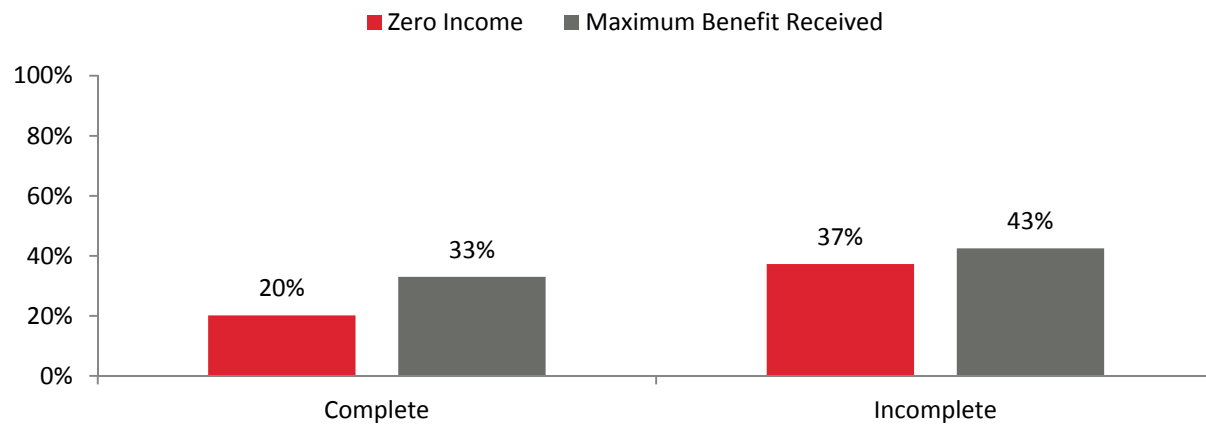
Source: Administrative data from five States

3. Incomplete cases include fewer households with elderly members and more households headed by individuals younger than 25

While differences in household composition were typically small or absent, incomplete cases were much less likely than complete cases to have an elderly individual within the household (6 percent as compared to 15 percent, figure 5.3). This pattern may reflect the nature of income among the elderly. SQCRs interviewed, for example, reported that this group is more likely to have fairly stable levels of unearned income that can be more readily verified and is relatively less mobile, making it easier to locate them.

Figure 5.3. Percentage of Households With Elderly by Review Completion Status
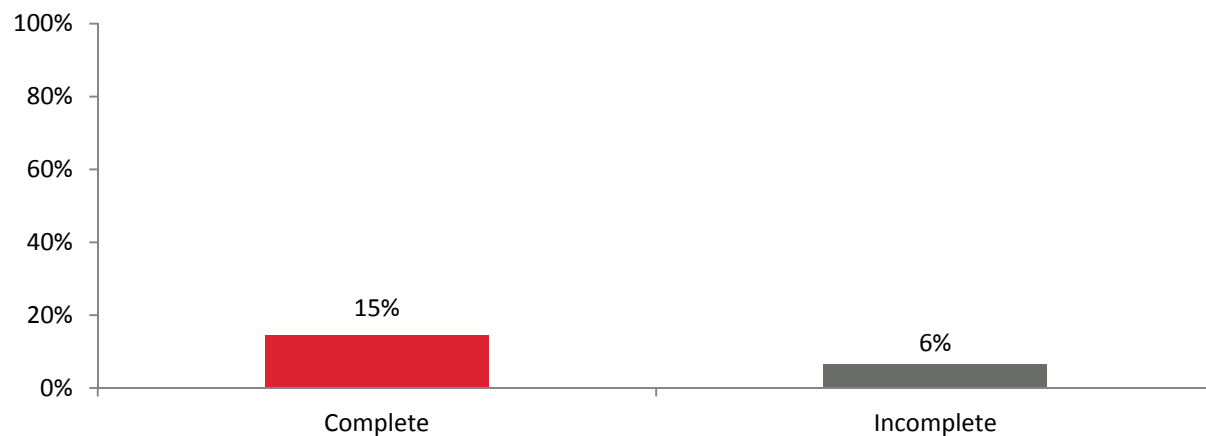
Source: Administrative data from five States

Similarly, incomplete cases tended to have younger heads of household than complete cases; incomplete cases were nearly twice as likely to have a head of household younger than age 25 (figure 5.4). Further research would be needed to better understand this trend.

Figure 5.4. Age of Household Head by Review Completion Status
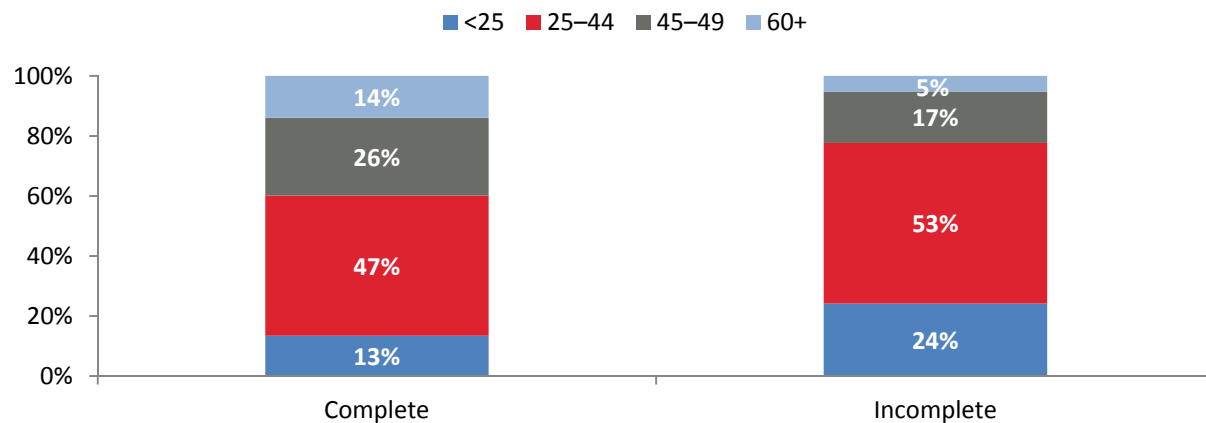
Source: Administrative data from five States
Note: Figures may not sum to 100 because of rounding.

4. Incomplete cases are more likely to be newly certified and to have shorter intervals since the most recent administrative action

For almost half of incomplete cases, a new certification was the most recent administrative action. In contrast, a certification was the most recent action for two-fifths of complete cases (figure 5.5). This suggests there may be more long-term SNAP households among the completed cases. Long-term SNAP participants tend to be those with low but stable incomes who are likely to participate in other assistance programs (e.g., TANF, SSI, Social Security; USDA FNS, Office of Policy Support, 2014). Further research would be needed to better understand the higher prevalence of new certifications among incomplete cases.

Figure 5.5. Percentage of Households for Whom the Most Recent Administrative Action Was Initial Certification by Review Completion Status
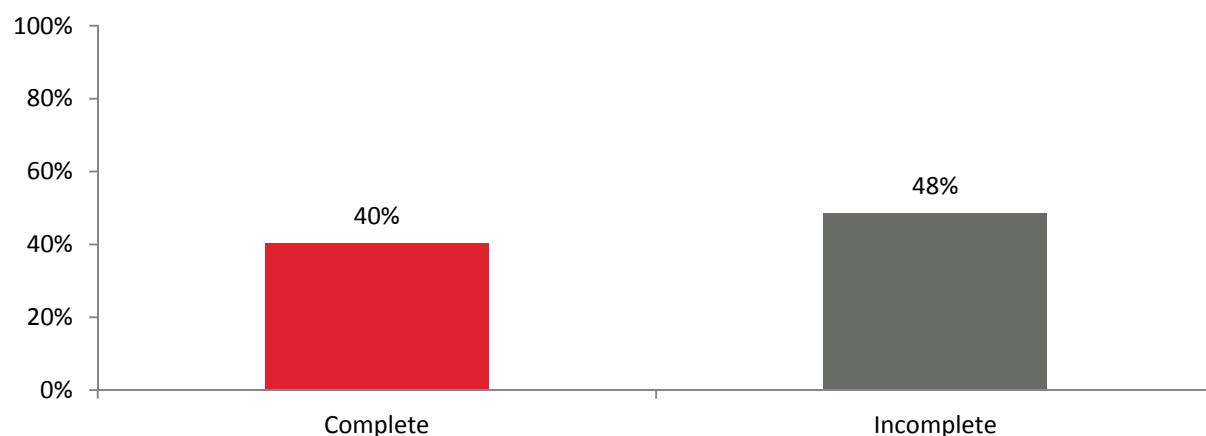
Source: Administrative data from five States

On average, more time elapsed between the last eligibility determination (i.e., certification or recertification) and the QC sample month for complete cases than for incomplete cases (see figure 5.6). This is consistent with the observation that there are higher percentages of households with an elderly person and unearned income among the complete than the incomplete cases. In general, certification periods tend to be longer for households whose circumstances are less likely to change. Specifically, many States take the option to certify households that consist solely of elderly or disabled individuals for longer periods, namely 24 months instead of 12. Of the four States included in this analysis, Iowa, Mississippi, and Oklahoma exercised this option.[56]

Figure 5.6. Mean Number of Months Between Most Recent Administrative Action and Sample Month by Review Completion Status
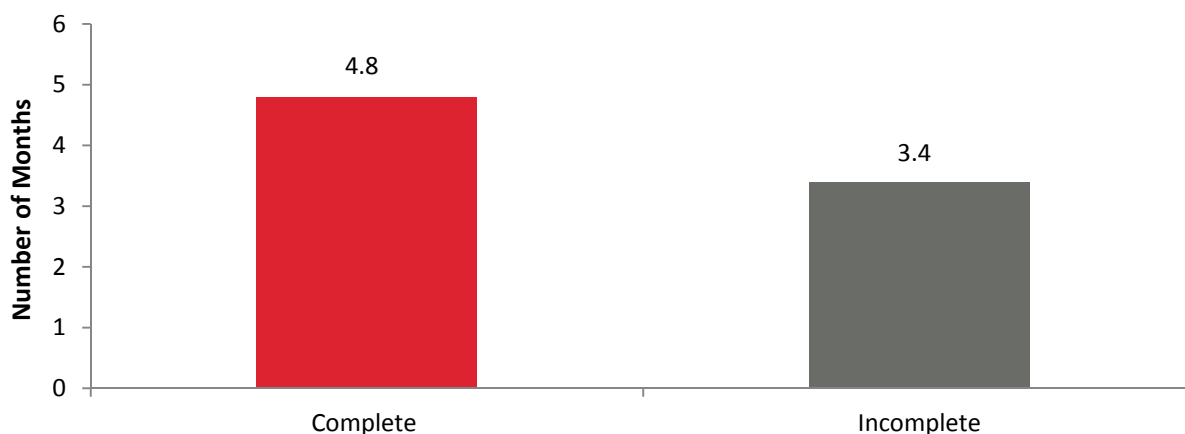
Source: Administrative data from five States

5. Incomplete cases are more likely to be in metropolitan areas and less likely to be in micropolitan areas

Incomplete cases were more likely than complete cases to be located in a metropolitan (or urban) area with a population of 50,000 or more (figure 5.7). Incomplete cases were less likely than complete cases to be located in micropolitan areas; these areas are around an urban area with a population of 10,000 to 49,999. All remaining areas are considered rural (U.S. Census, 2013). The proportion of households that were rural was similar among incomplete and complete cases; rural cases made up one-third of both complete and incomplete cases.

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[56] Data on most recent administrative action of incomplete cases were not available in Ohio; as a result, Ohio was not included in the estimates of the most recent administrative action.

Figure 5.7. Distribution of Metropolitan Status by Review Completion Status
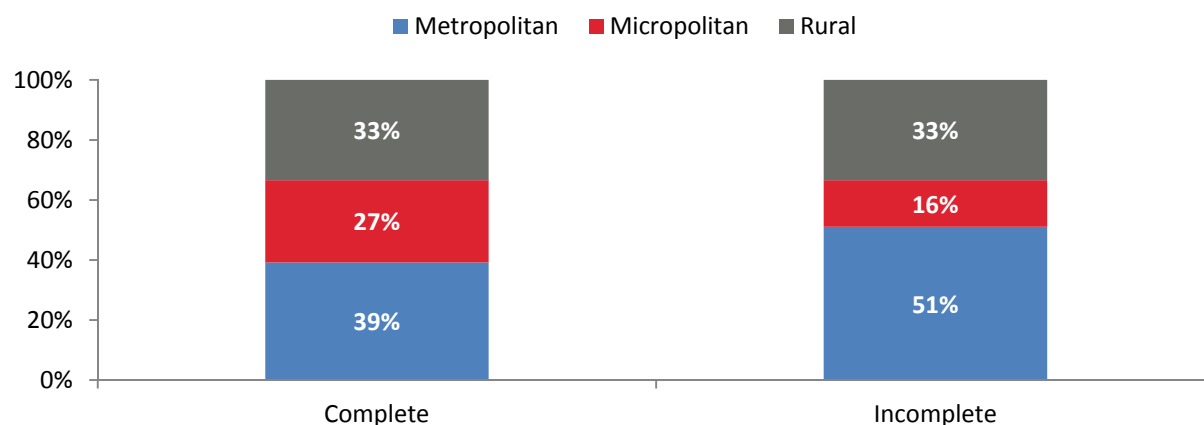
Source: Administrative data from five States

Possible explanations offered by State reviewers during site visits included relatively higher mobility among urban households and more employment opportunities. Mobility increases the difficulty of locating and contacting SNAP clients, while employment introduces the challenge of verifying earned income.

B. Potential Effect of Incomplete Cases on the Distribution of Characteristics in the National QC Research Database

Although these results suggest some systematic differences between complete and incomplete QC cases, they may not substantially affect the representativeness of national estimates generated from the QC research database. This is because the proportion of incomplete cases is relatively small (e.g., 7 percent nationally in FY 2012 and 6 percent of cases in these five States in FY 2010–FY 2012). Consequently, the effect on the characteristics of SNAP cases overall is modest. For example, although in percentage terms 1.5 times as many incomplete as complete cases have zero income in the four States where income information was available, the proportion of zero-income households overall increases by less than 1 percent when the incomplete and complete cases are combined (table 5.2). Similarly, the estimate of households with unearned income across the same four States decreases by 1.5 percent when the two groups of cases are combined.

It is important to note, however, that this analysis examines selected characteristics from a small subset of States—five or fewer[57]—and conclusions therefore may not be generalizable to the national SNAP population. Analyses of households with zero income, earned income, and unearned income, for example, were based on data from four States, including three with high completion rates and one with a low completion rate; estimates may be different using data from other States, particularly those with lower average completion rates. In addition, this analysis cannot assess whether bias exists in estimates at the State level or among subgroups of the SNAP population (e.g., estimates within the zero-income SNAP population).

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[57] Analyses of households with zero income, earned income, and unearned income were based on data from four States (Kentucky, Mississippi, Ohio, and Oklahoma). Analyses of households where the most recent action was certification were based on data from only three States with those data available (Kentucky, Mississippi, and Oklahoma). Analyses of all other characteristics were based on data from all five States.

Table 5.2. Distribution of Selected Characteristics Among SNAP QC Cases in Five States, Calculated With and Without Incomplete Cases, FY 2010–FY 2012

	Complete Cases (N = 17,679)	Incomplete Cases (N = 1,129)	Combined (Complete + Incomplete N = 18,808)	Percentage Point Difference (C minus A)
	A	B	C	
Households with elderly	14.5%	6.5%	14.1%	-0.4
Household heads younger than 25	13.4%	24.2%	14.1%	0.7
Households with zero income[a]	20.2%	37.3%	21.1%	0.9
Households with earned income[a]	27.3%	34.3%	27.7%	0.4
Households with unearned income[a]	62.0%	37.8%	60.8%	-1.2
Households receiving maximum benefit	33.0%	42.5%	33.5%	0.5
Most recent action was certification[b]	40.3%	48.5%	40.6%	0.3
Mean months since most recent administrative action	4.8	3.4	4.7	-0.1
Metropolitan households	39.2%	51.1%	39.9%	0.7
Micropolitan households	27.4%	15.5%	26.7%	-0.7
Total	**94.0%**	**6.0%**	**100%**	

Source: Administrative data from five States
[a] Analysis based on data provided by Kentucky, Mississippi, Oklahoma, and Ohio as data were not available for Iowa.
[b] Analysis based on data provided by Kentucky, Mississippi, and Oklahoma as data were not available for Iowa and Ohio.

Chapter 6. Findings From QC Re-Reviews of Incomplete Cases

An important component of this study is to determine whether a group of SNAP QC cases deemed incomplete after State and Federal review could be completed with an additional, independent round of reviews. This chapter presents results of re-reviews of incomplete cases from three States with relatively low completion rates: Iowa, Ohio, and Pennsylvania.

Results are presented both for cases that were completed by the study team and those that remained incomplete. For completed cases, the analysis compares the steps taken by the SQCR and study team field interviewers to identify potential strategies that might help increase completion rates. For cases that remain incomplete, a description of issues common to both rounds of review is presented. The analysis also determined whether the newly completed case reviews contained payment errors.

The field interviewer process for conducting the QC re-reviews is consistent with the general guidance provided by the *FNS 310 Handbook*, including reviewing the case file, contacting the client to schedule an in-person interview, conducting the interview, verifying eligibility criteria, and documenting findings. The study team provided field interviewers additional instruction specific to the re-reviews, such as how and when to contact the clients, to standardize procedures across field staff. Field interviewers informed clients that their participation in the study was completely voluntary, no information would be shared with the State, and they had no authority to terminate (or reinstate) benefits. Chapter 2 describes the field data collection process and any differences between the study procedures and State review procedures.

Section A of this chapter describes the outcomes of the re-reviews. The strategies used by field interviewers to successfully complete re-reviews are presented in section B, and the challenges encountered by field interviewers are discussed in section C.

A. QC Re-Review Outcomes

This section presents the outcomes of the QC re-reviews, including the number of completed re-reviews, the outcomes of the remaining re-reviews, and whether any errors were found.

Number and percentage of completed and incomplete re-reviews. A sample of 75 incomplete cases was initially selected for re-review; however, about 15 percent of these were subsequently eliminated or reclassified as NSTR.[58] Among the remaining 64 incomplete cases in this sample, field interviewers completed 11, or just over 17 percent (see table 6.1).[59]

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[58] Six of the 75 cases were removed from the initial re-review caseload because they were under investigation or had been completed since the Federal review. Five cases were reclassified as NSTR because of changes in household circumstances since the time of the SQCR review as follows: (1) all household members had moved out of State (three cases), (2) the client (in a single-person unit) had become incarcerated (one case), and (3) the client (in a single-person unit) had become hospitalized (one case). These five cases were removed from additional analyses.

[59] The rate among re-reviews where field interviewers successfully made contact with the client was higher, at 26 percent. The completion rate among contacted clients, referred to as the cooperation rate, is based on the number of completed reviews out of all re-reviews where clients were contacted (42), including those who refused.

Table 6.1. Outcomes of Field Interviewer Re-Reviews

	Number	Percent
Initial Sample	75	NA
Total Cases Re-Reviewed	64	100%
Complete	11	17%
Incomplete	53	83%

Source: Field interviewer case files for 11 completed re-reviews

The 11 re-reviews were completed despite a number of additional challenges:

▶ Having already been deemed incomplete by State and Federal reviewers

▶ Having a substantially longer period between the sample month and review period than for SQCRs

▶ Client participation was voluntary and without the possibility of penalty for non-cooperation

▶ Lack of access to government databases for verifications

▶ Requirement for a signed client release prior to all collateral contacts

The completed re-reviews may imply States could potentially complete a larger proportion of their QC reviews than currently being completed. However, it is difficult to generalize about incomplete cases in the overall SNAP QC caseload based on so few cases.

Number and percent of errors among completed re-reviews. Among the 11 completed re-reviews, three were found to be in error.[60] The resulting case error rate (the number of completed re-reviews with errors divided by the total number of completed reviews) was 27 percent (see table 6.2). The payment error rate (the total amount of benefits issued in error divided by the total amount of benefits issued) was 13 percent. In comparison, the national average case error rate for the most recent fiscal year (FY 2013) was 5 percent, and the national combined payment error rate was 3 percent (USDA, 2015b).[61]

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[60] A QC reviewer external to the research team reviewed and validated all findings and error analyses.
[61] The national payment error rate is based on the sum of the annual overpayment and underpayment error rate. It also includes an adjustment to the error calculation to account for the unknown error among the incomplete cases.

Table 6.2. Case and Payment Error Rates for 11 Completed Re-Reviews

	Number/Dollars	Percent
Total Completed Re-Reviews (Number)	11	100%
Cases in error (case error rate)	3	27%
Total Monthly Benefits Issued (Dollars)	$3,891	100%
Monthly benefits in error (payment error rate)	$523	13%

Source: Analysis of *FNS-380* form for 11 completed re-reviews

As shown in table 6.3, errors in all three cases were a result of overissuances. Two of the overissuance errors resulted from unreported earned income, and one was the result of incorrectly reported shelter costs. The reasons SQCRs were unable to complete the three original reviews varied. In one case, the SQCR was unable to establish contact with the client and there was no evidence the client was aware of the QC review (failure to cooperate). In another, the client did not show up for two scheduled interviews after establishing contact and did not reply to any phone messages (refusal to cooperate). In the third, the client refused to provide needed verifications (refusal to cooperate). The field interviewers were able to contact the clients, conduct interviews, and obtain all necessary verifications to complete these cases. [62,63]

In these three cases with payment errors, it is likely the errors would have been identified if SQCR reviews were completed. The overpayments subsequently would have been included in the State's error rate. However, based on such a small number of completed cases (11), and errors among those completed cases (3 out of 11), the findings do not support drawing conclusions about the potential bias in national error rates due to errors in incomplete cases. [64]

Table 6.3. Circumstances of Errors Among Completed Re-Reviews

	Characteristics of SNAP Unit	Income Sources	Reason SQCR Could Not Complete Review	Reason for Error
Case Error 1	Two-person unit; father and child	Earned income	No contact with client (failure to cooperate because no evidence that client received any messages) Attempted to complete without client cooperation but couldn't obtain all verifications Unable to contact client, so SQCR was unable to verify client's sample month earnings	Re-review determined the client had unreported earned income for the sample month (and for the 3 prior consecutive months under Simplified Reporting) that pushed the household above the gross and net income limits. The final error determination for this case was a $175 overissuance error for the QC sample month

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[62] As discussed in chapter 3, SNAP benefits may be terminated if a household can be shown to have refused to cooperate with the SNAP QC process. In two of the three cases with payment errors, the SQCR case was incomplete due to the client's refusal to cooperate, and benefits were terminated. While it is possible that the termination of benefits may have increased the client's likelihood of cooperation in these and other completed re-reviews, there is no clear evidence of this. Field staff informed clients that their participation in the study was completely voluntary, no information would be shared with the State, and they had no authority to reinstate or terminate benefits.

[63] Of the other eight re-reviews that field interviewers were able to complete, five were classified by SQCRs as refusals and the State terminated the clients' benefits for refusing to cooperate. SQCR case files do not always include definitive information on whether benefits were terminated for refusals, but given State practices, it is likely that benefits were terminated for most or all of the incomplete SQCR cases due to refusals. Client benefits are not terminated for failure to cooperate (see chapter 3).

[64] That is, based on the results of only three cases, the study cannot determine whether incomplete cases are generally subject to greater error than complete cases and cannot estimate the impact of incomplete cases on overall error rates.

	Characteristics of SNAP Unit	Income Sources	Reason SQCR Could Not Complete Review	Reason for Error
Case Error 2	Four-person unit; mother and 3 children	Child support; SSI	Client was contacted but refused to cooperate (failed to attend agreed-upon interview and failed to reply to any more phone messages left for her) Because of client's refusal to cooperate, SQCR could not verify household composition, earned income, child support, shelter expenses, and medical expenses The State terminated the client's benefits because of refusal to cooperate	Re-review determined the client's rental expense used at recertification and for the sample month was incorrect (the actual rental expense was much lower than the amount reported). The final error determination for this case was a $114 overissuance error for the QC sample month
Case Error 3	Four-person unit; mother and three children	Earned income; child support	Client was contacted and interviewed but refused to cooperate in providing needed verifications Because of client's refusal to cooperate in providing verifications, SQCR was unable to verify earned income and shelter expenses for the sample month The State terminated the client's benefits because of refusal to cooperate	Re-review determined the client had unreported earned income at the time of recertification that covered the authorization of the sample month's benefits. The final error determination for this case was a $234 overissuance error for the QC sample month

Source: Analysis of the *FNS-380* forms, documentation, and case files for 11 completed re-reviews as validated by QC reviewer external to the research team

B. Field Interviewer Strategies for Completing Cases Previously Coded as Incomplete

To identify potential strategies for improving completion rates, this section first describes why SQCRs were unable to complete the 11 reviews subsequently completed by field interviewers. It then discusses what the field interviewers did differently than SQCRs.

1. Reasons SQCRs Were Unable To Complete the 11 Re-Reviews Field Interviewers Completed

The initial incomplete status of these 11 cases was the result of some form of refusal or noncontact. The client refused to cooperate in seven cases (64 percent), and the client or collateral contact could not be reached (failed to cooperate) in the other four (36 percent, see table 6.4). In all cases, the SQCR attempted to complete the review without the cooperation of the client or collateral contact but was unable to do so.

In four of the seven refusals, clients did not show up for scheduled interviews; in the remaining three, clients refused to provide verifications. Among the four failures to cooperate, three resulted from the SQCR's inability to contact the client. The fourth involved a collateral contact who could not be reached.

Table 6.4. Reasons SQCRs Could Not Complete 11 Re-Reviews Completed by Field Interviewers

Outcomes of 11 SQCR Reviews	Number	Percent
Total	11	100%
Refusal To Cooperate	7	64%
Client verbally refused to conduct interview	0	0%
Client did not show up for scheduled interviews	4	36%
Client refused to provide verifications	3	27%
Failure To Cooperate	4	36%
Unable to establish contact with client	3	27%
Unable to reach collateral contact for needed verifications despite cooperation from client	1	9%

Source: SQCR case files for 11 QC cases completed by field interviewers

2. Field Interview Strategies for Successfully Completing Cases Coded as Incomplete

This section describes strategies to establish contact with clients, schedule and conduct interviews, and collect needed verifications.

a. Contacting Clients

Field interviewers generally were more persistent in contacting clients and used a greater variety of contact methods than those documented by SQCRs. This persistence may have improved the likelihood of successfully reaching clients and completing re-reviews.

Field interviewers made more contact attempts to reach clients. Both SQCRs and field interviewers sent an initial and follow-up letter to each client at some point during their respective reviews. However, the number of telephone calls and home visits differed. On average, SQCRs made four contact attempts to reach clients when scheduling interviews, while field interviewers made an average of eight (including phone calls, letters, and home visits).

One effective strategy field interviewers reported is calling all numbers in the client's file multiple times and at different times of the day. While many numbers were disconnected or out of service, sometimes one of them worked. In one case, for example, the field interviewer reached the client at the fifth phone number tried.

Field interviewers used a greater variety of contact methods. In addition to making more contact attempts, field interviewers also used a wider variety of contact methods. In all but 1 of the 11 completed re-reviews, SQCRs used only letters and telephone calls to communicate with clients.[65] Field interviewers, however, used text messaging, email, social media, and home and neighborhood visits in addition to calling and sending letters to clients. For example, a free text messaging service was used to confirm and finalize appointments.[66] Field interviewers also used social media and other online services such as Facebook, Spokeo, and Whitepages to identify new or confirm existing information.[67]

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[65] The exception is one case in which the SQCR visited the home but still did not connect with the client.
[66] Field interviewers were provided and trained in using a free Web-based text messaging application from Google Voice.
[67] Facebook.com, a social media service, and Whitepages.com, an online service to look up phone numbers, are free. Spokeo.com, an online search engine that organizes White Pages, public records, and social network information to find

Field interviewers noted that text messaging was particularly useful because it allowed clients to make last-minute changes and to reschedule appointments easily and quickly. For clients who otherwise were difficult to reach, home visits seemed to make a difference.

Table 6.5 provides an illustrative comparison of the steps taken by an SQCR and field interviewer to review a case. In this example, the SQCR made five contact attempts by letter and telephone. In contrast, the field interviewer made 12 attempts by letter, telephone, and text and also used social media to confirm the client's location. Overall, it took the field interviewer 41 days to complete the entire review (32 days to schedule and conduct the interview). In contrast, the SQCR spent 8 days attempting to contact the client before dropping the case as incomplete. The comparison illustrates how the greater number and variety of attempts by the field interviewer to contact the client proved successful.

Table 6.5. Case Example: Comparison of Contact Strategies Employed by SQCR and Field Interviewer

SQCR Review	Field Interviewer Re-Review
1. The SQCR sent a letter to the client's address listed in the case file with an interview date and time at the SNAP office.	1. The field interviewer called the client and left a voice message.
2. The client failed to show up for the interview.	2. The field interviewer called again later that day, 3 days later, then 3 days after that and left a voice message saying she would be sending a letter with an appointment date and time and to please call back to confirm (or cancel/reschedule) the appointment.
3. The SQCR called the client and left a voice message asking to reschedule the appointment.	
4. The SQCR sent an address verification form to USPS, which verified the client's address.	3. The field interviewer then checked Facebook, Spokeo, and the White Pages and found the client on Facebook, which confirmed the client's town (but no specific address).
5. The SQCR coordinator then sent a second letter asking the client to contact the coordinator by a specified date.	
6. The SQCR sent a failure to cooperate notice to the client, and the case was coded as incomplete because of failure to cooperate.	4. The field interviewer sent a letter to the client's address listed in the case file with an appointment date and time at the client's home and a list of verifications needed.
	5. The field interviewer called the client several days before the interview and left a voice message reminding the client of the interview.
	6. The client called the field interviewer back and said he did not receive the letter because he had moved.
	7. The field interviewer rescheduled the interview for a more convenient time, obtained the new address, and sent a second letter with the agreed-upon new appointment date and time.
	8. The field interviewer called the client the day before the scheduled interview to remind him of the interview.
	9. The client sent a text message to the field interviewer saying he could not make the scheduled appointment, and they rescheduled for several days later.
	10. The interview was then successfully conducted.

Source: SQCR and field interviewer case files for 11 QC cases completed by field interviewers

information such as addresses and phone numbers, is $4.95 per month for a 3-month membership and $3.95 for a 6-month membership.

b. *Scheduling and Conducting Interviews*

This section describes how SQCRs and field interviewers contacted clients prior to interview dates and offered a selection of interview locations. These contacts may have helped to build rapport and trust, thus improving client willingness to cooperate in the reviews. Scheduling interviews in the client's home may also have improved cooperation by reducing the need for the client to travel to a SNAP office or other location.

Field interviewers attempted to make verbal contact before scheduling and conducting interviews. Field interviewers spoke with clients (either by phone or in-person) prior to the interview in seven of the 11 completed re-reviews. This contact allowed field interviewers to explain the review process up front, to schedule (or reschedule) the interview for a convenient date and time, to remind clients of the scheduled interview, and to inform them of the verification documents needed. In contrast, SQCRs relied primarily on mail to schedule the appointment and attempted to phone the client in only 3 of the 11 cases to confirm the interview date after sending the letter. Instead, SQCRs advised clients in the appointment letters to initiate a call if needed.

Field interviewers conducted interviews in clients' homes. Field interviewers scheduled all interviews in the clients' homes and made home (or neighborhood) visits when unable to reach the client. In contrast, SQCRs scheduled 10 of the 11 initial interviews in a local SNAP or government assistance office and scheduled 1 in a local library. Scheduling and holding interviews in clients' homes or neighborhoods may have increased cooperation by alleviating the burden and cost of traveling to a local office. To attend an interview in the SNAP office, those without a car may need to purchase bus or train fare or find someone to provide a ride.

Field interviewers traveled to the address listed in the client's case file on the date and time of the interview even when they were unable to make verbal contact with the client. If the client was home, the field interviewer could introduce the study and conduct the interview. If the client was not home, the field interviewer could leave a note on the door, ask neighbors about the client's whereabouts, and come back another time. In two cases, field interviewers were able to complete the review because they went to the address listed in the client's case file even though they had not been able to reach the client by phone or receive a response to letters sent.

Table 6.6 illustrates a case where the field interviewer's visit to the client's home led to a successful interview. The field interviewer was able to find and interview the client in 7 days after he made a home visit to the client's address. The field interviewer was able to talk to the client's grandmother about the study, gain her trust, and ultimately locate and interview the client.

Table 6.6. Case Example: Comparison of Steps Taken To Schedule an Interview

SQCR Review	Field Interviewer Re-Review
1. The SQCR sent a letter to the client's address listed in the case file with the date and time of the appointment at the SNAP office.	1. The field interviewer called the client's telephone number listed on the SNAP application; a male answered and was evasive about the client's location.
2. The client failed to show up for the interview.	2. The field interviewer called back, but no one answered; he left a voice message asking the client to contact the field interviewer at his cell phone number.
3. The SQCR called the client but received no answer and was not able to leave a voice message.	3. The field interviewer sent an appointment letter to the client's address listed in the case file with an appointment date and time at the client's home.
4. The SQCR sent a certified letter to the client's address.	
5. The SQCR called the client; a male answered but did not know the client's location.	4. On the day of the scheduled interview, the field interviewer went to the client's home; his grandmother answered the door and said the client did live with her off and on during 2013 but was no longer living there.
6. The SQCR sent a letter to the county agency asking to have the client contact the SQCR if the client came into the office.	5. The grandmother then provided information on where to find the client (and gave the location).
7. The certified letter was returned as unclaimed.	6. The field interviewer then went to the location provided by the grandmother and found the client there.
	7. The interview was then successfully conducted.

Source: SQCR and field interviewer case files for 11 QC cases completed by field interviewers

c. Obtaining Verifications To Complete Reviews

Both field interviewers and SQCRs faced the challenge of obtaining documentation from collateral contacts when required verifications were not available in the case file or from the client. Field interviewers took additional steps to obtain missing verification.

Field interviewers worked directly with collateral contacts to obtain missing documentation. While SQCRs often relied on clients to obtain necessary verifications, field interviewers more often contacted collateral contacts directly to obtain needed information. In 7 of the 11 cases, the field interviewer worked directly with the collateral contact (by phone and/or in person) compared with only 3 of these cases when under SQCR review. For example—

▶ In one case, the SQCR was unable to contact the client's former employer to obtain verification of earnings the client received for sporadic work. This was the only missing verification in the SQCR review. The field interviewer, however, called the employer repeatedly. After several attempts, along with additional calls and text messages, the field interviewer convinced the employer to email verification of the sporadic earnings.

▶ In another case, the SQCR was unable to confirm shelter expenses with the client's landlord. The field interviewer went to the landlord's former office address, obtained his current phone number, called the landlord for his new address, and went directly to his new office. The field interviewer then met with the landlord, explained what he needed, and obtained the signed verification of the client's shelter expenses.

▸ In two cases, the SQCR was unable to complete the review without the client's cooperation.[68] In both cases, the field interviewer pursued collateral contacts directly, obtained the necessary verification and completed the case re-review.

C. Field Interviewer Challenges That Commonly Prevent Completion of Cases Previously Coded as Incomplete

Although field interviewers successfully completed 11 re-reviews, they were unable to complete the remaining 53 re-reviews. This section describes key challenges faced by SQCRs and field interviewers that prevented completion of their reviews.

Overall, the incomplete reviews for both sets of reviewers resulted more often from failure to cooperate than refusal to cooperate (see table 6.7). For field interviewers and SQCRs, most failures to cooperate stemmed from being unable to establish contact with the client (42 percent and 40 percent of all incompletes, respectively). The remaining failures to cooperate were the result of not being able to reach the collateral contact for needed verifications. Field interviewers may have had more difficulty obtaining collateral verifications because they did not have access to all relevant databases, more time had elapsed between the sample month and review period, and they required written consent from the client to contact collaterals.

Clients not showing up for scheduled interviews was the circumstance that was most often associated with a refusal to cooperate. This was true both for field interviewers and SQCRs. Outright verbal refusals occurred somewhat more often among field interviewers than among SQCRs. This pattern is consistent with the fact that client participation in the re-reviews, compared to State QC reviews, was voluntary and refusal carried no penalty.

Table 6.7. Reasons for Incomplete Reviews for Field Interviewers and SQCRs Incomplete

Reasons	Field Interviewer Re-Reviews		SQCR Reviews	
	Number	Percent	Number	Percent
Total	53	100%	53	100%
Refusal To Cooperate	18	34%	25	47%
Client verbally refused to conduct interview	7	13%	4	8%
Client did not show up for scheduled interviews	9	17%	12	23%
Client refused to provide verifications	2	4%	9	17%
Failure To Cooperate	35	66%	28	53%
Unable to establish contact with client	22	42%	21	40%
Unable to reach collateral contact for needed verifications despite cooperation from client	13	25%	7	13%

Source: SQCR and field interviewer case files for 53 incomplete reviews

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[68] A previously reported source of self-employment earned income was missing in one case, and rental expense was missing in the other case.

1. Difficulties Finding Reliable Contact Information

Contacting clients who were no longer at the same phone numbers or addresses recorded in the case files was particularly challenging for both field interviewers and SQCRs. As shown in table 6.8, this occurred in 40 percent of the reviews and 42 percent of the re-reviews. This challenge occurred even though field interviewers made more contact attempts and used a wider variety of contact methods. The reasons were often related to the lack of a working telephone number for clients; by the time of a review, many phone numbers had been disconnected or no longer worked.[69] The widespread use of cell phones has exacerbated this problem. When clients rely on cell phones rather than landlines, there is no common place to look for updated cell phone numbers or cross-reference addresses. Frequent changes in cell phone numbers (particularly common for pay-as-you-go-plans) also make it more difficult to find reliable contact information. In about half of the cases where both the field interviewers and SQCRs were unable to contact the client, it was the same client they were unable to contact in both cases.[70] These results suggest that some clients may be very difficult to contact regardless of the persistence or variety of attempts made.

Table 6.8. Extent of Client Contact for Incomplete Reviews

	Field Interviewer Re-Reviews		SQCR Reviews	
	Number	Percent	Number	Percent
Total	53	100%	53	100%
Unable to establish contact with client	22	42%	21	40%
Established contact with client but could not interview (and could not obtain all verifications)	16	30%	16	30%
Conducted interview (and could not obtain all verifications)	15	28%	16	30%

Source: SQCR and field interviewer case files for 53 incomplete reviews

2. Frequently Missed Appointments

Even after establishing client contact, SQCRs and field interviewers failed to conduct an interview in almost a third of their reviews. Most often this happened because the client did not show up for the interview. Even after agreeing to an interview date and time, clients frequently did not show up at the SNAP office (for SQCR reviews) or were not at home (for field interviewer reviews). As described earlier, SQCRs typically made some additional efforts to reschedule missed appointments, and field interviewers were even more persistent in their efforts. While field interviewers' persistence and willingness to connect with clients at their homes helped convert some incompletes, a majority of cases remained incomplete after the re-review.

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[69] The study team received updated contact information from the State SNAP offices in the month before re-reviews began.
[70] In only about a third of the cases shown in table 6.8 where the outcome for both the field interviewers and SQCRs were (1) established contact with client but could not interview or (2) conducted interview (and could not obtain all verifications), it was the same client in both cases.

3. Difficulties Obtaining Verifications

Clients often did not have all paystubs, cancelled checks, bills, and other documents required to verify income and expenses for the sample month. This occurred for both SQCR reviews, which took place 1–3 months later, and for re-reviews, which occurred 6–12 months beyond the sample month. As a result, not only did clients have difficulty providing the required documentation, but field interviewers found collateral contacts difficult to reach and with little incentive to provide the needed information.

In 15 of 53 cases, field interviewers were able to complete all other aspects of the re-review (contacted client, conducted interview, and obtained some verifications) but could not complete the review because of missing verifications. The most common verification field interviewers and SQCRs were unable to obtain was wage and salary information, followed by shelter costs.

Chapter 7. Challenges and Recommendations Related to SNAP QC Review Completion

This chapter summarizes challenges encountered by State and Federal SNAP QC staff when conducting SNAP QC reviews and how these challenges contribute to low completion rates. The chapter also describes promising practices, including those implemented or recommended by States, for addressing those challenges. The findings in this chapter synthesize results from each component of the study, including interviews and surveys of State and Federal SNAP QC staff, administrative data, and field re-reviews of incomplete cases. Sections A and B describe challenges and recommendations related to the SNAP certification process and SNAP QC process, respectively. Section C highlights additional recommendations for improving the SNAP QC process.

Similarities among States with high or low completion rates are highlighted where present. It is important to note, however, that States varied both within and across completion rate groups on many relevant factors, such as reviewer workload, State certification policy, and modernization of tools and processes. This variation and complexity obscures the relationship between specific challenges and QC completion rates. For example, one State with a low completion rate reported substantial improvements in the efficiency and quality of its QC review process with the introduction of an integrated, electronic case review management information system. However, the benefits of the system were offset by other challenges, such as high reviewer workloads and a State policy that requires explicit client consent to collect verifications from collateral contacts. Similarly, two other States with high completion rates used more time-consuming, paper-based processes but attained higher completion rates, in part because of smaller reviewer workloads.

A. Challenges and Recommendations Related to SNAP Certification Process

Results suggest efforts to modernize or streamline SNAP application and recertification procedures may have had unintended consequences for QC procedures. Challenges related to SNAP certification processes included—

▶ Increased use of phone and online application procedures (section 1)

▶ Reduced familiarity of eligibility workers with individual clients (section 2)

▶ Limited verification of eligibility criteria (section 3)

▶ Inadequate awareness of the SNAP QC process among clients and eligibility workers (section 4)

Each of these challenges is described briefly below.

1. Increased Phone/Online Application Procedures

QC reviewers surveyed and interviewed reported challenges related to an increasing number of SNAP applications being submitted online and/or more application interviews being conducted by phone rather than in person. QC staff reported these changes "train" clients that they no longer need to appear in person to receive benefits. As a result, clients do not

The ever-changing eligibility process and business model in our State makes it more difficult to complete cases.

—SQCR Survey Respondent

understand or take seriously the need for in-person QC interviews. This experience and implicit message may contribute to the high rate of missed appointments for QC interviews.

2. Reduced Familiarity of Eligibility Workers With Clients

QC reviewers reported that eligibility workers have weaker ties to individual households than previously as a result of multiple modernization strategies. These include more phone and online applications; increased use of call centers; and "case-banking" structures in local offices, where several eligibility workers, rather than just one, handle any given case. Reviewers noted these trends:

▸ Reduced likelihood that eligibility workers could assist the SQCRs with locating or contacting a household selected for QC review or could provide additional information on a case

▸ Decreased likelihood that household changes or notifications (e.g., updates to contact information or household composition) were documented in a given case

▸ Decreased likelihood that clients would have a familiar person to call with questions about the QC process

3. Reduced Verification Requirements at SNAP Application

Some reviewers noted that fewer elements of eligibility are verified at certification than in previous years. States have the option to verify certain expenses (housing and child care, for instance), household composition, and the identification of household members. Client self-declaration may be sufficient in some instances. While these changes have increased the efficiency of certification processes, they have increased the challenge of verifying those elements during the QC process by reducing the documentation available in the case file.

Since most SNAP applications accept self-declaration, it makes it more difficult when QC comes in and is asking for all types of verifications. Clients often don't understand why QC needs all this extra [documentation] when the [local] office just accepted their statement.

—SQCR Survey Respondent

Reviewers in one State, for example, noted shelter and utility costs were not verified during the application process and were particularly challenging for QC reviewers to verify. Similarly, reviewers in some States noted that mortgage company information is seldom noted in the case file because it is not necessary for the application. If the information is not in the case file and the client cannot be located or contacted, reviewers do not know where to send a verification form and consequently are unable to complete the case.

4. Inadequate Awareness of QC Requirements

Many QC reviewers and managers reported the lack of client awareness about the QC process presents a challenge. Some suggested eligibility workers may not have time or opportunity to explain to clients the possibility of being selected for QC review and the clients' responsibilities in that process. Respondents suggested these trends might be related to the large caseloads and high turnover among local offices. This finding may also be related to changing certification processes described above that reduce the interaction between certification staff and participant households.

While reviewers in some States reported SNAP local office staff were generally familiar with QC, reviewers in several States reported challenges stemming from eligibility workers not understanding the

QC process. QC respondents in two States reported that eligibility workers sometimes told clients it was unnecessary to comply with a QC request to appear for an in-person interview.

5. Promising Practices and Recommendations for Addressing Challenges Related to SNAP Certification Processes

State and Federal SNAP QC staff offered the following recommendations to address recent SNAP certification practices that impede the completion of QC reviews:

Increase awareness among clients about the QC process. Increasing awareness of the QC process may increase client cooperation with QC reviews. For example, eligibility workers might increase their efforts to inform clients of—

- ▶ The possibility their case may be sampled for QC review
- ▶ The requirement to participate in a face-to-face interview
- ▶ The penalties for noncooperation
- ▶ The importance of retaining documentation to verify eligibility criteria

Additionally, more information could be provided about the SNAP QC process on State SNAP Web sites. Such efforts may reduce the incidence of missed interviews and missing documentation. Some respondents recognized, however, that limited time and resources among local office staff may preclude such efforts by eligibility workers.[71] These limited resources must be weighed against the very small likelihood of a case being selected for QC review in any given month.

Educate eligibility workers about the SNAP QC process. Informing eligibility workers about the QC process may also be helpful, particularly in local offices with less exposure to QC or with greater staff turnover. In one State, QC respondents reported favorable results conducting presentations for local SNAP offices aimed at increasing their understanding of the QC process and its requirements.

Train eligibility workers to provide thorough documentation in the case file. Several QC reviewers noted it would be helpful if eligibility workers provided more thorough documentation in the case file, even if verification from these sources was not required for certification. For example, entering the name and contact information for child care providers and mortgage companies in the case record would aid the SQCRs in identifying the relevant collateral contacts. Without even a name of the company or individual, the SQCRs are unable to verify the relevant information in the absence of a successful client interview.

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[71] Several respondents had observed, for example, diminished staff sizes, greater turnover, and increased caseloads among State local office staff in recent years.

B. Challenges and Recommendations Related to SNAP QC Process

Study findings identified several challenges related to the SNAP QC processes that may contribute to low QC completion rates, including the following factors described below:

▶ Obtaining household cooperation (section 1)

▶ Obtaining enough information to make a determination (section 2)

▶ The amount of time required to complete cases (section 3)

▶ Potential tradeoffs between case completion and error findings (section 4)

▶ Use of external consultants (section 5)

1. Obtaining Household Cooperation

Reviewers across the United States consistently reported that obtaining household cooperation was a significant challenge, particularly in a timely manner. Although gaining cooperation was often easier once reviewers spoke with the client, initially locating and persuading clients to show up for interviews posed a substantial challenge. Reviewers reported that over time clients have been increasingly difficult to locate as a result of—

▶ Greater mobility (i.e., more frequent change of residence)

▶ Frequently disconnected or out-of-service phones

▶ Lack of a permanent address (e.g., individuals living with others temporarily)

▶ Failure to update contact information, which is not required for clients under simplified reporting

▶ Diminished cooperation of collateral contacts over time

Most clients now are very mobile and when they do move, they seldom if ever report a change of address to the [local] office. Case records no longer contain collateral or landlord names, phone numbers, or addresses. An increased number of people now have no paper trails—no personal property, no real estate, no address or telephone number in their names, no work history, no utilities in their names, and no current driver's license. [There is] no way to locate or confirm where these people are living. Even the post office is no longer a good source of information... [because] they no longer keep names of the people living at that address... Neighbors do not want to get involved.

—SQCR Survey Respondent

Most respondents did not observe patterns or trends in the types of cases that are less likely to be located and to cooperate with the review. However, some suggested the following characteristics may be associated with ease or difficulty of case completion:

Employment. Some respondents indicated employed individuals might be particularly likely to miss appointments because of challenges around work schedules. Even after successfully interviewing employed participants, the challenge to document income remained when clients did not have

appropriate employment/earnings documentation available.[72] This was particularly true for reviewers in States without access to The Work Number subscription service.

Urban/Rural Location. Several respondents reported fewer challenges gaining cooperation from clients in small towns or rural areas. These households may be easier to locate and contact for several reasons: (1) there may be less mobility, (2) the communities may be places where "everyone knows everyone," and (3) there may be a general sense among reviewers that individuals in these areas are more responsive and forthcoming.

Conversely, some respondents perceived that urban cases may be more challenging because of greater mobility and higher rates of employment. There was also a general sense that urban clients are less trusting or cooperative.[73,74]

Homelessness. Reviewers had mixed perspectives on the ease of interviewing individuals who were homeless. Some reported these individuals were more difficult to locate; others reported that once reached, they were particularly responsive because of their more critical need for the benefits. Some reviewers reported that cases of participants who are homeless could often be completed without an interview or by using likely conclusion because their income and expenses are usually straightforward.

Evasive Clients. Some reviewers reported some clients "don't want to be found," either because they have something to hide (such as a new job) or because they are unfamiliar with the QC process and think they are in trouble. Often more extensive methods for locating individuals and obtaining interviews are needed in these cases.

Promising Practices and Recommendations for Obtaining Household Cooperation

Be Persistent and Use a Variety of Contact Modes, Including Text Messaging. Persistence in efforts to contact clients appeared to be the most successful strategy for securing a household interview; reviewers in States with high completion rates tended to report doing "whatever it takes to complete a case." SQCRs in these States, along with study field interviewers, typically made more attempts to reach clients (including at various times of day), used a greater variety of contact methods (e.g., phone, mail, certified mail), and used more creative ways to locate clients. In particular, study field interviewers and some SQCRs found text messaging to be a useful means of reaching clients.

Schedule and Confirm Appointments By Phone. Rather than mailing an appointment letter first, SQCRs interviewed in one State with a high completion rate, as well as study field interviewers, scheduled appointments by phone with clients to ensure interviews were held at a mutually convenient time and place. Several SQCRs and study field interviewers noted that calling clients in advance of appointments to confirm and/or remind them of their upcoming interviews also seemed to decrease the likelihood of missed appointments.

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[72] Administrative data corroborate these findings, showing incomplete cases were more likely to have earned income than complete cases.

[73] A few respondents conversely perceived that, once reached, urban cases were more likely to keep appointments, while rural clients were more likely to miss appointments. These respondents indicated rural clients were less trusting of outsiders or the government and less forthcoming with information.

[74] Administrative data corroborate these findings, showing incomplete cases were more likely to be in metropolitan areas and less likely to be in micropolitan areas.

Allow Flexible Interview Times. QC staff and study field interviewers consistently reported that making efforts to accommodate clients' work schedules helped ensure household cooperation. Accommodations included lunchtime or after-shift appointments. Additional flexibility with evening or weekend interviews may enhance completion as well.

Consider Using Home Visits for Both Locating and Interviewing Clients. Scheduling interviews in the clients' homes worked well for study field interviewers and SQCRs in some States with high completion rates. Respondents suggested interviewing in the clients' homes reduced clients' transportation barriers to traveling to a local SNAP office or other location and increased access to documents needed for verifications. Home visits were

> *I believe that our recent policy of meeting clients in the local offices… as opposed to going to their homes to interview has negatively affected my cooperation and my completion rates.*
>
> —State Survey Respondent

also useful for establishing contact with clients whose phone numbers had been disconnected and who were otherwise difficult to contact. Study field interviewers reported this practice was successful in completing cases previously coded as incomplete.

This recommendation, however, must be balanced against safety concerns. Several study respondents noted concerns about safety of reviewers when traveling (typically alone) to clients' homes. Concerns included high-crime neighborhoods, criminal history of clients or members of their household, and presence of dogs. For this reason, some States had encouraged all QC interviews to be held in local SNAP offices or other mutually agreed-upon locations.

Assess the Effect of Conducting More Interviews by Phone. QC staff held mixed opinions about

> *I think it would be helpful if it was not a requirement to do a face-to-face interview. A lot of times, we are able to reach a client by phone and could do an interview over the phone, but the client doesn't follow through with the face-to-face.*
>
> —State QC Manager Survey Respondent

conducting interviews by phone. SNAP QC staff in several States felt that conducting more QC interviews by phone would enhance QC completion rates.[75] Phone interviews may be more convenient for clients and would save time and resources reviewers spend traveling to missed appointments. Such savings are significant for cases located long distances from reviewers. Other respondents, however, noted that phone interviews would not obviate the challenge of obtaining the necessary verification documentation. In other words, if the documentation is not obtained from the client in person, QC staff have to

rely on clients to submit it by mail or other means. This may offset the advantages of conducting phone interviews and not result in a higher completion rate.

Look for Ways To Increase Efficiency. States with high completion rates emphasized efficient review procedures. Reviewers in these States routinely called clients to confirm or schedule appointments and acted more proactively in connecting with collateral contacts than their counterparts in States with low completion rates. These States also emphasized getting reviewers into the field as soon as possible after case assignment to allow time for appointments to be rescheduled if necessary—or as a last resort, for terminating the client's SNAP benefits in time for them to comply with QC within review deadlines.

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[75] Most States currently exercise an option to conduct phone interviews for QC cases where households receive $100 or less in monthly benefits.

As an example of efficiencies, reviewers and study field interviewers in one State scheduled appointments with clients by phone and conducted the interviews in the client's home. This approach minimized lost time from missed appointments by eliminating transportation barriers for the client and made it easier to obtain documentation.

Another State emphasized collecting as much information over the phone as possible when a client is initially reached, such as by requesting all collateral contact information when the client called to confirm or reschedule an appointment. This practice gives the reviewer a head start on collecting necessary verifications and may prevent an incomplete case status if the interview is not successfully conducted. Study field interviewers also collected critical information from clients over the phone that facilitated completing reviews even in the absence of an interview.

Enhance Ability To Terminate SNAP Benefits Within the QC Review Period. State SNAP QC staff consistently cited benefit termination for noncooperation as an effective means of obtaining clients' cooperation. However, in some States, reviewers reported challenges for meeting State deadlines for case completion because of the need for local office staff to process case terminations prior to the QC deadline.[76] To address this challenge, some reviewers recommended QC staff have the authority to terminate a household's benefits directly when clients refuse to cooperate. Several reviewers also recommended that QC staff be given authority to terminate benefits for clients who fail to cooperate, instead of only those who refuse to cooperate. These respondents perceived that some clients were aware that noncontact would not result in loss of benefits and purposefully evaded reviewers; for example, by not answering the phone or responding to letters.

2. Obtaining Enough Information To Complete a Review

Missing or unavailable documentation can prevent case completion. If the client does not provide the necessary documentation for some reason (e.g., inability to schedule interview with the client, inability of the client to provide a document), a case may still be completed if the reviewer obtains all the necessary documentation directly from collateral contacts and/or available databases. Depending on the complexity of the case, it may be completed relatively easily with minimal verifications required, or it may be challenging, involving a wide array of documentation collected from various sources. For example, reviewers noted that cases involving self-employment were particularly difficult because self-employment cannot be verified externally and requires the clients to maintain and provide detailed documentation on income. Other methods for data verification and associated challenges are illustrated below.

Access to Electronic Databases. Limited access to electronic databases presented a challenge to QC reviewers. In particular, access to The Work Number service allows users to verify employment and income information but is costly to States. Reviewers in a few States reported their States had recently stopped using this service because of the financial burden incurred.[77]

Limited access to electronic databases also presented a challenge for Federal reviewers. Staff in Regional Offices reported that in recent years several States had limited FQCR access to State certification

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[76] In many States, only local SNAP office staff have the ability to terminate a household's SNAP benefits, and some States reported difficulty gaining cooperation from local offices in a timely manner.
[77] The QC director in one State that had recently ended its subscription to The Work Number indicated the service had cost the State approximately $40,000 per month.

systems and other relevant databases used by SQCRs. This hampers FQCRs' ability to verify information that could be used to complete cases.

Cooperation of Collateral Contacts. For information that could not be verified through client-provided documents or access to electronic databases, review completion often required cooperation from collateral contacts. Challenges with collateral contacts arose when QC reviewers needed to obtain client consent to release information. In some States, the release included in a signed SNAP application was typically sufficient for obtaining cooperation from collateral contacts, while in other States, employers and other collateral contacts more frequently requested a separate release form. In one State, a State policy prohibited QC reviewers from collecting information from third parties without the client's signature on a consent form. This limited the ability to verify case information independently, particularly in cases where clients did not show up for the interviews.

Use of "Likely Conclusion" Technique. As described earlier, the likely conclusion option is intended to allow reviewers to make reasonable assumptions about missing case information based on other available data. However, both State and Federal SNAP QC staff noted the *FNS 310 Handbook* instructions around its use are vague, leading to uncertainty as to its appropriate use.

Promising Practices and Recommendations for Obtaining Enough Information To Make a Determination

Expand Efforts To Use Collateral Contacts in Absence of Client Interviews. In general, reviewers in States with high completion rates tended to make greater efforts to complete cases without client cooperation by pursuing collateral contacts, regardless of whether they had a signed release.[78] For example, reviewers in one State reported more responsiveness from collateral contacts, by posing questions in a yes/no format, rather than posing open-ended questions. A reviewer might ask, for example, "You recently verified this information about <client name>. Is this still correct?" Even without a signed client release, this approach was perceived to be more successful.

Provide More Guidance and Expand the Use of Likely Conclusion. Expanded training from FNS on the use of likely conclusion may be helpful for increasing its use in some States. Staff in one State had received training from the Regional Office on appropriate uses of the technique, and reviewers reported it was helpful in understanding how and when to apply the strategy. Reviewers in other States recommended FNS provide additional training on likely conclusion. Similarly, some recommended expanded guidance in the *FNS 310 Handbook* on the use of likely conclusion, including examples of cases when the technique should and should not be used. A few reviewers recommended allowing the use of likely conclusion for more elements of the *FNS-380* worksheet to help increase completion rates.

Expanded use of likely conclusion may enhance completion rates in States where the technique is underused. Two QC directors from States with both high and low completion rates agreed increased use of likely conclusion had reduced the number of incomplete cases in their States.

Expanded Access by FQCRs to Electronic Databases Accessed by States. Federal SNAP QC review staff noted that expanded access to State databases would enhance their ability to conduct reviews.

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[78] Reviewers in these States, however, were also more likely than reviewers in States with low completion rates to make multiple attempts to contact households to secure interviews (and hence were less likely to need the cooperation of collateral contacts).

3. Time Needed To Complete Cases

Reviewers reported that completing some cases was relatively easy, while others were challenging and time-consuming, particularly those requiring participation of collateral contacts or involving clients who were highly mobile or otherwise difficult to locate. Some reviewers noted that elderly, disabled, and/or single-person adult cases tended to be easier to complete. These cases typically had less information to verify, and verification of unearned income from Social Security and disability benefits was readily available to reviewers through State data systems. In contrast, employment could be difficult to verify, particularly if reviewers were unable to interview the household and if employers were not cooperative.[79]

The time available for reviewers to spend on any given case, however, varied across States, based on reviewers' workloads both for QC and other responsibilities. Reviewers interviewed in States with low completion rates generally had both larger QC caseloads and more duties outside of QC compared to reviewers in States with high completion rates. A supervisor in one State with a low completion rate reported that review staff in that State had insufficient time to exceed two attempts to contact a case, which was described as the *FNS 310 Handbook's* minimum requirement. Similarly, one State QC director reported that other job duties assigned by higher management outside the QC division made it more difficult to complete QC reviews with recent staff losses. In contrast, reviewers in other States with smaller workloads were more likely to report they had sufficient time to complete their cases despite making relatively more extensive efforts to locate and contact cases.[80]

Limited time and competing priorities also presented challenges for the Federal SNAP QC review process. Several FQCRs reported it is time-consuming to complete cases submitted by States as incomplete and to formally disagree with cases. Similar to SQCRs, FQCRs in each of the Regional Offices reported having assignments outside of QC reviews (e.g., policy work, management evaluations, training) and filling in for reviewers who are unavailable (e.g., new position, illness-related absences, other non-QC assignments). Together, these factors constrained the ability of Federal staff to complete their reviews in the allotted timeframes and may have inhibited efforts to complete incomplete cases or return incomplete cases to States for additional work.

Promising Practices and Recommendations Related to Time Needed To Complete Cases

Decrease QC Sample Size. The QC director in one State with a high completion rate reported the State's completion rate had improved after it changed its approach to sampling QC cases. This director reported the State had been sampling a larger number of cases than necessary in anticipation of dropping a substantial percentage of cases as incomplete. The director attributed higher completion rates in recent years in part to decreasing the sample sizes and spending more time completing a smaller number of cases. This approach may only apply, however, in limited circumstances and in States with larger-than-average QC sample sizes.

Reduce Workloads of State and Federal Reviewers. In States and regions with large workloads, reducing workloads, or otherwise allowing more time to work on cases, may increase case completion.

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[79] These findings are consistent with administrative data analyses showing incomplete cases are more likely to have earned income than complete cases.

[80] Several staff members at the Regional Offices also perceived that States' limited resources presented challenges for conducting SNAP QC reviews, including insufficient staffing and large workloads.

Additional time may increase the level of effort SQCRs invest in locating and contacting clients and collateral contacts, or FQCR efforts to attempt to complete incomplete cases.

4. Potential Tradeoff Between Case Completion and Error Rates

Since there are financial rewards and penalties associated with State error rates, it is not at all in reviewers' best interests to find errors. This places reviewers between a rock and a hard place—as State employees, it is obviously not to the benefit of the State if we discover errors leading to financial sanctions, and yet to do the work as we are meant to by the spirit of the QC program, it is inevitable that errors will be found.

—SQCR Survey Respondent

Both State and Federal review staff described a potential tradeoff between QC case completion and error rates. Federal reviewers, for example, expressed there may be insufficient incentive for States to raise their case completion rates. To the contrary, States may have more incentive to lower their completion rate by coding cases with possible errors as incomplete. This is because States receive bonus funds for low or improving error rates and may be assessed financial penalties for error rates that are high relative to other States.[81] Although completion rates figure into the calculation of the error rate, the effect of classifying error cases as incomplete may still effectively lower the error rate.

FNS may assign an error rate based on the best information available and use that assigned error rate for liability determination. This action is possible if FNS determines States' QC practices are deficient in some way, but is rarely used.

Several State SNAP QC staff similarly noted potentially competing priorities of lowering error rates and completing cases, with strong financial incentives for one and not the other. Some SQCRs described feeling pressure by management to minimize efforts to complete cases because of the risk of uncovering information that may contribute to error. Similarly, SNAP QC managers in some States reported pressure from higher levels of management to discourage unnecessary efforts by reviewers (i.e., efforts exceeding minimum requirements) that may lead to identifying errors. Both reviewers and managers perceived threats to the integrity of the QC review process. As described by one survey respondent, "We reviewers are … toeing the line of unethical practices in order to reduce errors. Short of plunging straight into unethical and immoral means, I do not believe it is possible to further lower errors."

Promising Practices and Recommendations Related to the Potential Tradeoff Between Case Completion and Error Rates

Prioritize Case Completion. Strong emphasis by State QC management on QC case completion, independent of payment accuracy, may play a role in ensuring high completion rates. Managers in States with high completion rates more often reported case completion was a top priority for SNAP QC in their State. Consistent with this emphasis, these managers more frequently required reviewers to make additional efforts to attempt to complete cases,

Management strongly encourages reviewers to go to all lengths to complete a case (especially difficult to locate, homeless individuals). This includes, but is not limited to, calling and visiting area shelters, contacting family members, using the internet as a means to find client.

—SQCR Survey Respondent (State With High Completion Rate)

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[81] States with error rates above a certain threshold are classified as being in liability status in the first year that occurs and are assessed penalties if they do not move out of liability status in the second consecutive year.

rather than dropping cases after a missed appointment. One State QC director described the importance of maintaining independence between SNAP QC and general program management to preserve the integrity of QC. This director emphasized case completion, even if it led to a higher error rate, but also reported a high degree of pressure from higher agency management challenging these practices.

Reevaluate Incentives Provided to States for Low Error Rates. Some QC respondents recommended revising the system of incentives for States with low or improving error rates. Alternatively, higher penalties for incomplete cases may reduce the disincentive for error identification during the QC process.

5.   Use of External Consultants

Interview and survey respondents in several States—including States with low completion rates and some with higher completion rates—reported using external consultants currently or in the past to reduce error rates. One commonly used consulting company, for example, identified 27 States as current or former clients on its Web site. Some States began using a consultant upon entering liability status or when sanctioned in an effort to improve program performance; one State reported hiring a consultant recommended by FNS. Consultants reviewed SNAP QC procedures and policies, conducted trainings for QC staff, participated in meetings (including error review calls), and/or consulted on individual cases as needed.

> *Prior to being affiliated with private consultants, we took whatever steps needed to complete cases. Once we became affiliated with contractors, we were instructed that when a case appeared to be in error, that we should not pursue all avenues to obtain necessary verifications in order to complete the case, but to drop the case for failure or refusal to cooperate.*
>
> — State QC Manager Survey Respondent

The use of consultants to reduce errors in some States appeared to reduce reviewer efforts to complete individual cases. Although less effort may be related to a variety of other factors (e.g., constraints on time and resources resulting from large workloads), reviewers reported that consultants advised them to reduce efforts to complete cases beyond the minimum standards explicitly required by the *FNS 310 Handbook*. These reviewers described feeling discouraged from "being investigators" to avoid unnecessarily uncovering information that might lead to increased error. Specifically, QC staff reported that the consultants discouraged reviewers from making more than two contact attempts and from making home visits to clients.

> *I feel QC management in our State [has] a negative impact on our State's completion rate because of a conflict of interest. [Our State] has a high error rate and our eligibility managers put pressure on our [QC management] to call cases correct when they are not or to find reasons to submit cases as incomplete when those cases are clearly errors. QC reviewers should be allowed to do their job as written in the 310 manual and not have to go back and change cases that are clearly errors to make the error rate look better than it really is.*
>
> —SQCR Survey Respondent

Some reviewers reported the consultants advised QC staff on both broad strategies to avoid errors and on individual case errors themselves. One such broad strategy, for example, was to incorporate medical expenses that might offset an error found for cases entitled to deductions for medical expenses (e.g., elderly, disabled) but where such expenses had not been reported. Review staff in some States reported

consultants also participated in routine error review calls to consult on individual cases and recommend ways to avoid error by interpreting "gray areas" of policy differently. For example, one gray area was the extent of effort reviewers must make to obtain cooperation from clients or collateral contacts before classifying the case as incomplete owing to failure to cooperate.

A few reviewers reported the consultants explicitly encouraged reviewers to drop error-prone cases.[82] One reported strategy, for example, was to send an employment verification form to the client to forward to the employer and return to the QC reviewer, rather than sending the form directly to the employer despite the presence of a release form. The extra steps in this process were understood to decrease the likelihood of the reviewer collecting the information, which would allow the reviewer to drop the case as incomplete.

Federal Perspectives. Federal QC staff reported an increasingly adversarial relationship between States and Regional Offices among States that had hired consultants along with the perception that consultants encouraged States to provide as little information as possible to the Regions on each case. This practice, in combination with reduced access to State systems by Federal staff, prompted FQCRs to make more requests for additional information. FQCRs noted that States using consultants tended to resist these requests and were reluctant to cooperate.

Regional Office staff also expressed concern that consultants instructed some State reviewers to manipulate data and to take advantage of vague language in the *FNS 310 Handbook* to minimize error rates. While visiting a State, one FQCR sat in on a training by a consultant and described how the consultant provided inserts in the *FNS 310 Handbook*, illustrating how to circumvent steps, resulting in more cases being dropped.

Reviewers provided several examples of how this might occur. For example, in a case where error is suspected, a reviewer might send out verification forms that are not strictly necessary and drop the case when all forms are not returned. Similarly, in a case where actual household composition appears to be either larger or smaller than the case record indicates—which might introduce an error—the reviewer might drop the case, claiming an inability to verify household composition. When States are unable to find loopholes to exploit in a case, they might send the case to the consultant for additional assistance.

Regional Office staff, particularly those who had substantial experience in QC, noted not all SQCRs seemed to adopt the strategies promoted by the consultants. Regional staff elaborated that some SQCRs felt the consultants' techniques compromised their autonomy; others objected to what they viewed as a lack of integrity.

Promising Practices and Recommendations Related to the Use of External Consultants

Clarify Guidance in the *FNS 310 Handbook*. Some reviewers and managers suggested FNS could provide additional written guidance to clarify the level of effort required prior to disposing of cases as incomplete. These reviewers indicated the *FNS 310 Handbook* needed to be more explicit about the effort required prior to designating a case as incomplete. This might include defining what "counts" as a contact attempt and exactly how many attempts should be made before designating a case as

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[82] These are cases where preliminary review of available documentation indicates that errors in certain elements, such as income, may result in an overall error for the case, or where some information collected during the review is at odds with what is in the case file, but is insufficient to make a determination about which is correct.

incomplete.[83] At the same time, several cited the *FNS 310 Handbook* guidelines as requiring a minimum of two attempts to reach clients and felt other factors (e.g., workload) precluded additional efforts.

Another strategy may be to specify expected protocols for QC review procedures in a step-by-step format. One State with a high completion rate, for example, developed and disseminated detailed training materials for new reviewers, including a flow chart specifying expected protocols for conducting QC reviews in their State (e.g., how and when to contact clients, what steps to take following a missed appointment; see figure 7.1). Another State provided detailed written documentation of step-by-step procedures for conducting a SNAP QC review. Developing a standard process for reviewers and illustrating it in such a tool likely reduced ambiguity for reviewers as to what steps to take during a review and when sufficient efforts had been made to designate a case as incomplete. Similar efforts by FNS may clarify expectations of reviewer efforts and improve consistency across States in QC review procedures.

Figure 7.1. One State's SNAP Interview Review Process Flow Chart
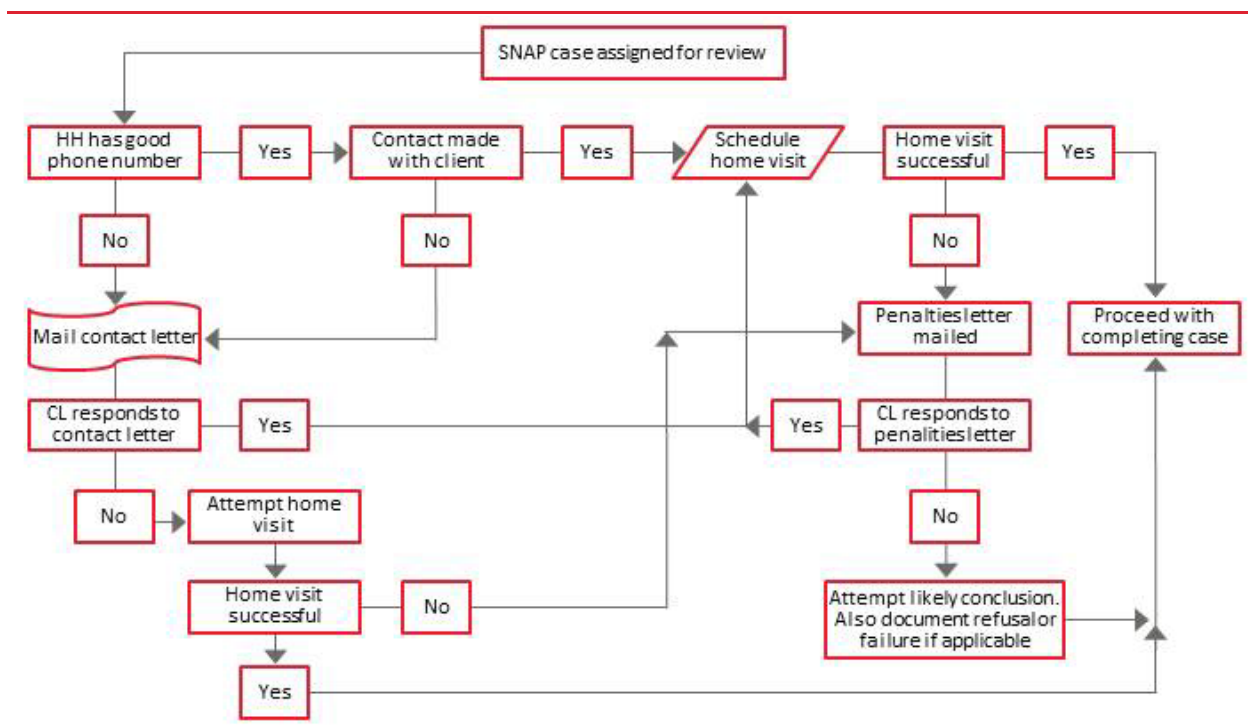
C. Additional Recommendations To Improve the Overall QC Review Process

In addition to the solutions offered above to individual challenges, study findings highlighted several recommendations for improving the QC review process overall:

▶ Technology to enhance the SNAP QC review process (section 1)

▶ Enhanced guidance from FNS on SNAP QC review procedures and policies (section 2)

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[83] Several reviewers also felt the *FNS 310 Handbook* was difficult to navigate in general; these reviewers recommended that an online searchable format would be helpful, including keyword searches that would direct the user to relevant sections.

‣ Expanded Federal efforts to complete incomplete cases (section 3)

‣ Additional data collection on incomplete cases (section 4)

1. Technology To Enhance the SNAP QC Review Process

Some States used technology to improve the efficiency of the QC process. Supervisors in one State with a high completion rate, for example, monitored reviewer progress on a case-by-case basis using an online workflow management system that stores all cases and files and documents all work on a given review. Because the system was accessible by all review staff in the State, supervisors could monitor and review cases without waiting for the reviewer to mail the paper file. The system also populated and generated all necessary forms and letters for the reviewer. The director in this State partially attributed the State's high completion rate to this online, paperless system, citing how effectively it had streamlined the State's QC process and provided additional time to QC staff to work on cases. In contrast, reviewers in other States printed paper copies of QC cases—despite the availability of electronic versions of documents in some of these States—and mailed them to their supervisors, who typically were located in a different part of the State.

Cell Phones. Some reviewers suggested State-issued cell phones might improve completion rates and other aspects of the QC process. They noted cell phones would provide a way for clients to reach reviewers more easily while they are in the field, an important consideration when reviewers are travelling hours each day. Many reviewers have personal cell phones but cited safety concerns related to using those phones to contact clients because the approach provides clients with reviewers' personal contact information.

> *We recently were issued smartphones, which enable us to text a household when we have been unable to reach them by calling. The households seem to respond a little more often to a text instead of the phone call. The smartphones are also allowing us to take a photo of the verifications and email it back to our work instead of spending the time to write all the information down.*
>
> —SQCR Survey Respondent

Smartphones could also be used, as they were in one State, for collecting copies of documentation using the camera function. The phones also facilitate text messages to clients who may not have minutes on their phones to take calls but can receive and send text messages. Text messages can also help reach a client who is reluctant to answer the phone when caller identification shows the call is from a State government office.

Videoconferencing. Some State QC staff suggested increased use of videoconferencing to facilitate greater case completion. Like phone interviews, videoconferencing may be more convenient for clients by eliminating the need to travel to a QC interview. Similarly, videoconferencing may free up limited time and resources for SQCRs by reducing travel time. Others voiced reservations, citing security concerns related to personally identifiable information or constrained State resources as barriers. Some reviewers also observed that videoconferencing does not address the challenge of getting clients to mail the required documentation.

2. Enhanced Communication on Policies that Affect SNAP QC Reviews

Enhanced Federal Guidance. Both State and Federal QC review staff perceived weaknesses in the communication of policy changes from the National Office. Regional Office staff suggested disseminating guidance about Federal policy from the National Office more widely throughout the Regions and to the States. One Regional respondent described the usefulness of informal opinions obtained from the

National Office regarding interpretations of unclear regulations and the challenge of not being permitted to cite these opinions in communications with States; this respondent suggested that greater transparency about National Office policy guidance and interpretation would improve the QC process.

Enhanced Communication about State Policy. Federal QC review staff indicated that changes in State policies that affect certification and QC were not always communicated to Regional Office QC staff before cases affected by those policies were reviewed by the Regional Offices. Improved communication between QC and policy staff within the Regional Offices would make the Federal QC process more efficient.

3. Expanded Federal Efforts To Complete Incomplete Cases

One strategy for increasing completion rates may be to expand FQCR efforts regarding incomplete cases. Regional QC review staff reported they infrequently returned incomplete cases to the States for additional work, such as additional attempts to reach a client or to obtain needed verifications directly from collateral contacts without client cooperation. Similarly, FQCRs seldom attempted to complete incomplete cases themselves. Although field investigations by FQCRs may not be feasible because of greater geographic distances and constrained resources, additional efforts by FQCRs by phone, email, or mail may increase the number of case completions. These efforts in turn may encourage State QC staff to invest additional efforts to complete cases prior to submitting them to FNS.

4. Additional Data Collection on Incomplete SNAP QC Cases From Program Files

States currently report minimal information on incomplete cases in SNAP QCS relative to what is reported for complete cases. SQCRs have access, however, to information on the demographic, economic, and administrative characteristics of incomplete cases based on data in State certification IT systems. Providing this information to FNS through the routine QC reporting process would enhance understanding of these cases and any patterns over time or across States. More specifically, this information would further FNS's knowledge of the bias in the distribution of cases in the QC database and the potential bias in payment error rates. Collection of information on the reasons for designating a case as incomplete could ultimately help target efforts to improve completion rates.

Abbreviations and Acronyms

FNS — Food and Nutrition Service

FQCR — Federal Quality Control Reviewer

FY — fiscal year

MARO — Mid-Atlantic Regional Office

NSTR — not subject to review

QC — Quality Control

SNAP — Supplemental Nutrition Assistance Program

SNAP QCS — SNAP Quality Control System

SQCR — State Quality Control Reviewer

SWRO — Southwest Regional Office

USDA — U.S. Department of Agriculture

Glossary of Terms

Active case   A household certified prior to or during the sample month that was issued SNAP benefits for the sample month. This includes households certified for benefits in the sample month and issued benefits in the next month

Case error rate   Percentage of cases with errors

Case record   The record establishing a household's eligibility or ineligibility, and in active cases, authorizing the issuance of a SNAP allotment. Included are records referred to as the case file or certification record

Certification action   The action taken on a case prior to or on the review date that authorized the sample month's issuance. Includes initial certifications, recertifications, interim changes, changes prior to issuance, and authorizations of supplemental issuances

Certification month   The month in which the case was most recently certified or recertified, prior to the sample month

Collateral contact   A source of information that can be used to verify household circumstances. Collateral contacts are generally individuals such as landlords and employers, but they may also be documents such as those maintained in government offices. A collateral contact cannot be a person who was in the SNAP household under review or a person or office within the State agency administering the program for purposes of primary or secondary evidence

Eligibility Worker   State SNAP personnel who interviews, certifies, and recertifies clients.

Error   In an active case, an error occurs when a Quality Control reviewer determines a household that received SNAP benefits during the sample month is ineligible or received an incorrect allotment. Errors in active cases involve dollar loss to either the participant or the government

     For negative cases, an error signifies the reviewer determined the decision to deny, suspend, or terminate a household was incorrect

Field interviewer   A member of the research team for this study who conducted re-reviews of incomplete cases in three States.

FNS 310 Handbook   *FNS 310 SNAP Quality Control Review Handbook* provides the requirements and guidance for States to conduct SNAP QC reviews and determine errors

FNS 311 Handbook   *FNS 311 Quality Control Sampling Handbook* explains requirements concerning sampling, estimation, data management for State agencies QC systems

FNS 315 Handbook   *FNS 315 Validation Review Handbook* provides FNS Regional Offices with procedures and guidelines for monitoring State agencies' QC systems, including the procedures necessary to validate error rates and to assess States' sampling procedures, estimation procedures, and systems for data management

National Office   FNS headquarters in Alexandria, Virginia; works with the Regional Offices in the administration of SNAP and other nutrition programs

Negative case	A household whose application for SNAP benefits was denied or whose SNAP benefits were suspended or terminated by an action in the sample month or by an action effective for the sample month
Overissuance	The amount of the SNAP benefits exceeds the allotment the household is eligible to receive
Payment error rate	The combined payment error rate; the sum of the overpayment and underpayment error rates. The payment error rate is based on the total amount of benefits issued in error divided by the total amount of benefits issued, adjusted for differences between State and Federal findings and for unknown level of error among incomplete cases
Recertification	A certification action taken to authorize benefits for an additional period of time immediately following the expiring certification period
Review date	For QC active cases, refers to a day within the sample month—either the first day of the fiscal or calendar month or the day a certification action was taken to authorize the issuance—whichever is later. The review date is never the day the quality control review is conducted
	The review date for negative cases, depending on the characteristics of individual State systems, can be the date the eligibility worker makes the decision to suspend, deny, or terminate the case; the date the decision is entered into the computer system; the date of the notice to the client; or the date the negative action becomes effective
Sample month	The month of the sample frame from which a case is selected
SNAP QCS	SNAP Quality Control System, the online system for States and FNS Regions to document and submit findings from SNAP QC case reviews
Underissuance	The amount of the allotment is less than the amount the household is eligible to receive
Variance	The incorrect application of policy and/or a deviation between the information used and the information that should have been used to authorize the sample month's issuance
Verification	The establishment of the accuracy of specific elements of eligibility and allotment by securing documentary evidence and/or by making collateral contacts with individuals other than members of the household under review. Households under review can provide verification for some elements

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Appendix A. QC Completion Rate for Active Cases by State, 1980 to 2014

Table A.1. QC Completion Rate for Active Cases by State: 1980 to 2014

	Oct 1980–Mar 1981	Apr 1981–Sept 1981	Oct 1981–Mar 1982	Apr 1982–Sept 1982	FY 1983	FY 1984	FY 1985	FY 1986	FY 1987	FY 1988	FY 1989	FY 1990	FY 1991	FY 1992	FY 1993	FY 1994	FY 1995	FY 1996	FY 1997	FY 1998	FY 1999	FY 2000	FY 2001	FY 2002	FY 2003	FY 2004	FY 2005	FY 2006	FY 2007	FY 2008	FY 2009	FY 2010	FY 2011	FY 2012	FY 2013	FY 2014
Connecticut	96.5	95.8	92.9	96.4	97.2	97.9	98.5	98.6	99.2	98.0	97.9	98.5	98.4	97.0	96.8	97.0	98.0	96.9	97.1	96.1	91.1	89.0	92.9	90.0	91.9	91.2	93.5	90.5	92.2	93.0	93.1	95.1	96.0	94.9	94.7	96.6
Maine	94.9	94.1	95.3	96.4	97.0	99.9	100.0	99.7	99.7	100.0	99.7	99.9	99.6	94.1	95.5	95.0	95.0	91.2	91.8	91.5	91.3	91.4	92.8	90.5	89.9	89.2	89.7	89.5	88.6	87.9	81.6	89.6	94.6	92.6	92.5	91.4
Massachusetts	85.9	87.7	89.0	88.5	93.0	96.9	93.4	93.5	95.4	94.3	95.8	93.4	95.3	95.9	94.3	95.0	94.3	94.8	91.7	89.9	89.3	90.1	90.6	90.2	89.3	89.1	88.2	89.6	90.5	92.1	90.3	94.4	93.2	89.6	91.5	92.0
New Hampshire	97.2	92.0	96.5	96.9	95.2	99.5	99.1	99.8	100.0	99.6	98.5	98.2	99.6	97.9	98.1	97.4	97.2	98.2	97.7	96.0	96.8	96.4	98.1	97.8	96.0	96.2	96.9	95.9	94.3	94.0	96.6	95.5	94.8	96.1	92.6	90.7
New York	89.8	84.2	94.1	95.2	95.8	96.4	97.2	97.6	95.4	93.7	94.2	94.2	91.9	90.2	90.0	92.1	93.7	94.3	85.4	90.2	92.9	92.1	91.6	91.4	90.8	91.1	89.1	87.5	88.4	90.5	87.8	92.2	92.2	92.4	90.3	90.7
Rhode Island	85.3	94.1	94.7	94.7	94.7	95.1	95.2	95.6	97.3	97.5	97.3	96.3	95.8	94.6	95.4	91.6	92.8	92.7	91.1	92.9	88.5	86.9	88.5	86.3	85.0	84.9	87.5	88.0	91.6	92.7	95.4	97.3	98.1	98.4	98.7	96.9
Vermont	98.3	95.3	95.2	95.3	97.3	97.1	98.5	98.5	99.5	99.2	99.3	100.0	99.6	98.1	97.9	95.9	97.6	97.5	93.9	96.8	94.9	93.7	96.2	93.4	92.6	93.6	94.7	92.4	91.8	93.3	92.7	90.7	97.8	98.7	97.6	85.9
Delaware	95.1	95.1	98.2	95.0	95.8	98.3	97.4	97.8	98.5	97.2	98.0	98.4	99.4	97.0	97.2	94.8	93.0	95.8	93.1	95.0	93.5	96.4	95.3	97.2	95.6	96.6	94.9	98.0	97.3	97.7	92.1	93.9	84.7	85.5	89.8	89.0
District of Columbia	85.2	89.6	89.6	89.4	92.9	94.8	96.2	95.4	98.7	96.0	95.8	95.7	93.7	91.8	89.4	81.2		88.6	92.2	85.8	97.6	97.9	96.4	96.8	96.7	96.9	97.1	94.8	93.4	92.3	87.8	96.5	95.3	95.6	96.8	98.9
Maryland	97.5	97.8	97.0	95.2	98.3	99.0	98.4	97.4	94.7	95.1	93.2	92.0	93.8	91.4	89.3	87.1	83.0	83.2	94.5	89.3	89.8	84.3	81.6	88.3	88.8	87.8	85.5	86.5	86.5	90.9	95.3	92.2	90.0	79.1	89.4	91.7
New Jersey	91.9	92.7	91.9	92.3	91.7	92.5	94.7	94.2	93.3	93.7	94.7	95.6	95.3	95.1	96.1	93.4	90.0	91.8	88.2	83.9	86.0	90.3	90.7	88.4	92.7	95.3	93.8	92.1	91.3	93.3	92.6	94.6	91.9	93.2	94.6	91.7
Pennsylvania	92.6	92.6	64.9	94.0	94.4	96.9	96.6	96.9	97.3	98.0	97.8	96.9	96.9	96.4	97.3	96.4	96.5	95.4	94.7	95.5	96.1	95.7	95.5	95.1	95.7	94.9	93.2	92.5	90.2	88.4	92.4	89.3	86.3	87.6	89.9	92.1
Virginia	93.4	93.2	95.9	92.9	92.6	93.3	96.3	96.0	98.1	98.0	97.4	98.9	98.1	98.1	96.6	94.2	94.2	91.2	90.3	92.2	92.2	90.9	91.5	91.3	91.3	91.3	91.0	87.7	87.7	90.9	92.5	94.1	88.3	88.4	87.9	87.1
Virgin Islands	48.5	31.3	48.7	92.4	92.9	97.7	99.0	98.4	98.6	99.7	99.3	98.1	98.5	99.2	99.3	100.0	97.7	96.0	95.3	98.3	99.3	99.0	98.4	98.8	99.7	98.8	99.1	99.1	98.7	99.1	100.0	99.1	99.4	100.0	100.0	100.0
West Virginia	97.1	96.0	96.3	97.1	97.0	94.7	96.5	96.9	97.3	95.9	95.3	95.5	95.7	94.4	94.8	93.9	93.4	90.4	88.3	88.8	89.6	90.5	90.3	89.1	92.7	88.3	89.2	88.9	88.8	88.6	90.3	91.9	93.5	92.6	90.6	90.5
Alabama	97.5	96.2	95.5	96.0	96.1	99.0	97.9	99.1	98.9	98.8	98.7	99.2	97.4	95.7	96.4	95.6	98.3	97.1	97.1	97.1	96.3	95.3	92.5	94.3	94.1	92.4	91.3	90.4	90.5	92.3	91.7	93.0	94.7	90.4	92.5	95.5
Florida	96.5	97.4	95.3	96.0	96.5	98.0	98.7	98.1	97.7	97.9	97.2	97.2	95.6	87.6	95.6	93.1	94.3	94.9	94.5	92.3	93.7	93.9	94.6	96.3	94.8	94.1	92.8	91.2	93.8	96.1	94.2	93.0	93.6	92.9	93.1	92.9
Georgia	95.6	94.6	88.1	73.8	94.7	96.8	97.4	97.4	98.4	98.0	97.9	97.7	97.6	96.4	96.3	95.5	96.9	95.6	94.6	93.7	92.8	95.4	92.7	91.7	89.3	89.7	87.2	92.6	91.3	90.3	90.4	90.1	89.8	90.6	92.0	93.6
Kentucky	96.1	95.0	94.2	93.9	94.4	97.3	96.4	96.9	96.4	96.4	96.8	97.7	96.2	96.4	96.3	95.0	93.5	91.3	89.8	89.3	91.7	90.3	89.8	88.8	85.2	86.2	84.2	82.4	81.7	77.5	79.0	86.5	98.3	99.4	99.1	99.6
Mississippi	97.6	78.2	97.6	98.5	98.0	99.1	99.5	98.8	99.0	99.4	98.6	98.7	98.8	98.7	97.6	97.2	94.9	94.2	91.6	92.6	93.8	93.4	94.2	93.3	94.1	93.9	71.9	92.5	94.1	95.4	95.2	97.0	98.6	96.4	95.5	93.4
North Carolina	95.7	78.1	94.5	94.7	96.3	98.7	98.5	97.4	96.9	95.2	94.6	93.8	94.0	97.0	97.3	97.7	98.6	96.3	95.2	93.9	95.9	94.6	94.8	95.0	93.6	92.7	94.3	94.4	95.1	95.2	97.5	98.1	98.8	98.1	98.5	99.3
South Carolina	96.1	95.4	95.6	96.1	96.9	97.0	98.4	97.3	97.4	96.0	96.2	95.1	95.6	93.7	94.2	90.6	90.6	91.6	91.9	88.4	87.2	93.9	94.4	96.6	95.6	95.4	93.7	92.7	92.6	90.8	90.2	89.5	94.2	96.3	97.6	97.8
Tennessee	97.6	93.9	95.3	97.2	97.1	98.6	98.7	98.2	97.6	98.5	98.1	97.2	96.7	95.6	95.3	93.0	92.5	92.9	92.7	91.6	87.6	85.7	88.1	89.9	87.4	86.4	86.5	85.2	81.8	82.2	82.7	87.3	95.7	92.8	92.9	90.0
Illinois	95.7	93.8	96.0	93.4	95.5	97.2	96.0	97.7	96.8	97.7	97.9	97.7	97.0	96.4	95.9	95.0	95.2	92.9	91.5	91.3	82.3	92.3	91.1	90.5	90.6	89.5	85.2	86.4	92.9	91.4	92.8	94.3	92.9	94.1	89.5	90.1
Indiana	95.0	95.9	95.4	95.8	95.8	97.9	99.2	98.0	98.7	98.9	98.6	99.0	98.9	98.0	97.0	95.9	95.1	96.6	96.0	94.7	94.7	94.5	94.7	95.0	94.6	94.8	95.6	94.0	94.6	93.2	93.0	91.2	89.8	94.2	92.1	90.1
Michigan	94.4	94.7	93.9	94.6	94.0	91.9	96.7	94.6	95.2	96.2	97.8	97.8	97.1	96.7	97.4	97.2	96.7	95.7	96.4	94.1	95.3	93.3	94.2	94.0	94.7	91.8	90.4	87.7	91.2	90.7	89.8	90.8	88.8	92.0	93.4	91.0
Minnesota	95.1	89.4	92.7	96.0	94.8	94.0	95.3	95.5	96.0	96.2	94.3	95.2	95.6	93.5	95.1	93.6	94.1	93.6	94.5	95.8	94.3	93.5	93.1	93.1	91.9	90.5	91.5	91.5	90.2	92.5	93.4	94.0	92.4	94.9	95.0	98.6
Ohio	94.0	93.2	96.2	96.3	96.3	97.8	96.6	96.4	95.9	94.1	90.9	92.9	93.3	92.3	92.6	90.3	91.3	88.8	90.6	87.4	87.9	90.0	87.6	86.0	85.6	87.8	89.6	86.4	85.2	86.6	90.0	93.5	93.2	89.6	92.7	88.5
Wisconsin	95.2	95.0	95.1	94.5	94.5	95.6	95.8	97.7	97.5	97.0	97.7	98.3	97.9	97.8	97.5	97.8	98.3	98.1	97.5	93.3	96.9	94.5	92.3	92.7	91.6	94.8	95.5	93.9	94.3	93.9	92.0	83.3	86.6	91.2	93.6	90.3
Arkansas	94.5	96.9	95.5	94.6	94.7	97.2	99.5	99.3	98.5	98.6	98.7	98.2	97.8	97.7	97.5	97.1	94.6	96.9	95.9	95.2	96.5	98.1	98.4	99.0	98.2	96.8	96.0	96.6	96.6	95.9	95.8	97.4	98.0	98.7	99.3	98.3
Louisiana	97.8	97.5	96.7	97.2	97.5	99.6	98.5	98.4	98.2	97.9	97.8	98.6	98.2	97.3	98.4	97.6	97.8	97.6	94.6	94.7	93.3	96.1	95.0	97.1	95.7	94.8	72.8	66.9	97.9	96.8	96.5	95.1	95.2	92.6	89.9	91.2
New Mexico	89.1	90.3	92.7	89.0	85.1	97.2	95.9	96.5	97.4	97.5	96.9	97.1	97.9	96.2	97.4	95.7	95.0	94.1	90.4	90.0	93.9	92.2	94.7	95.3	93.7	92.8	95.4	94.8	97.4	96.8	94.8	95.2	94.8	94.6	94.9	
Oklahoma	97.1	96.6	97.2	95.7	97.0	98.2	99.8	98.7	99.0	98.8	99.4		98.9	98.9	98.1	97.9	96.7	98.4	97.5	96.3	95.0	96.7	94.6	95.0	95.6	95.8	96.4	96.2	96.7	96.4	96.0	96.8	97.3	98.1	98.5	97.4
Texas	97.2	95.5	95.1	97.2	96.5	98.7	98.9	99.6	.2	94.7	91.7	97.6	96.7	96.4	95.7	95.3	95.9	94.6	95.3	95.3	96.2	97.6	96.4	95.7	95.6	95.8	96.4	94.2	95.4	95.3	95.2	95.0	92.5	91.3	92.6	88.6

Table A.1. QC Completion Rate for Active Cases by State: 1980 to 2014, *continued*

	Oct 1980–Mar 1981	Apr 1981–Sept 1981	Oct 1981–Mar 1982	Apr 1982–Sept 1982	FY 1983	FY 1984	FY 1985	FY 1986	FY 1987	FY 1988	FY 1989	FY 1990	FY 1991	FY 1992	FY 1993	FY 1994	FY 1995	FY 1996	FY 1997	FY 1998	FY 1999	FY 2000	FY 2001	FY 2002	FY 2003	FY 2004	FY 2005	FY 2006	FY 2007	FY 2008	FY 2009	FY 2010	FY 2011	FY 2012	FY 2013	FY 2014
Colorado	95.9	89.2	78.5	70.5	93.9	95.4	94.9	98.3	97.3	95.5	94.4	96.2	97.4	96.6	94.4	96.3	95.8	95.0	95.5	91.4	92.7	93.6	94.4	93.9	95.4	95.2	92.2	95.3	93.3	91.3	93.4	92.2	92.0	95.6	94.7	92.2
Iowa	93.1	93.3	94.9	93.1	94.6	97.1	97.0	96.3	95.4	96.6	96.0	96.1	95.5	94.8	95.3	92.8	91.8	89.9	90.2	92.0	90.4	90.3	88.9	89.3	88.8	89.4	87.1	88.8	85.9	85.1	89.7	84.6	89.7	92.7	92.2	89.6
Kansas	93.0	94.1	95.0	95.5	94.5	96.7	97.7	98.4	99.6	99.6	98.9	98.1	97.6	97.8	96.1	97.0	95.1	95.3	95.5	96.3	96.1	95.0	94.3	93.2	93.6	91.9	90.3	95.3	88.4	88.2	90.3	94.8	96.0	95.2	93.1	90.8
Missouri	97.5	95.5	96.9	97.6	98.1	96.3	96.5	99.1	99.0	98.9	98.5	98.4	98.0	97.3	97.0	96.5	96.0	96.1	95.6	94.3	93.3	95.0	93.1	92.9	89.9	81.1	81.5	82.4	89.3	94.6	92.2	92.8	95.9	96.6	86.3	84.8
Montana	90.7	91.1	96.9	93.7	95.7	96.8	99.6	99.2	95.4	95.8	96.3	94.9	94.8	94.3	93.5	92.8	94.1	92.7	91.6	90.3	91.7	93.5	89.5	87.3	90.5	86.6	83.8	86.2	88.9	90.4	94.2	96.6	96.9	92.0	93.4	89.3
Nebraska	95.0	95.0	97.2	95.0	74.0	92.6	99.0	98.1	97.3	98.5	98.5	97.2	97.4	97.4	94.1	94.1	94.3	93.4	92.7	93.7	94.1	95.6	96.9	96.0	95.7	93.7	93.7	93.8	92.0	93.3	92.6	90.9	86.2	86.6	87.0	87.4
North Dakota	96.9	98.1	89.2	96.1	98.2	98.2	99.0	90.6	99.5	99.5	99.7	99.5	99.3	99.3	99.0	98.7	98.6	97.7	86.9	98.5	99.0	98.3	95.9	96.0	96.7	97.3	97.1	96.3	96.9	97.6	98.8	99.2	98.9	98.7	98.2	98.3
South Dakota	98.3	100.0	98.9	99.0	98.7	98.4	98.3	97.9	97.0	99.6	99.5	99.8	99.8	99.3	99.3	99.8	99.7	99.7	99.7	99.7	98.9	98.0	97.8	96.6	98.1	97.2	97.8	97.7	97.7	98.3	97.7	97.7	97.9	99.4	99.8	99.4
Utah	95.6	93.5	97.7	94.7	95.7	99.8	100.0	99.8	99.2	98.9	99.1	97.7	98.3	96.2	98.5	98.1	96.6	97.8	97.7	97.6	97.4	98.2	96.1	94.6	96.1	93.7	93.6	90.9	88.7	91.4	92.4	92.4	94.9	97.1	94.8	95.3
Wyoming	94.9	94.6	96.0	97.3	95.1	99.1	98.8	97.9	94.5	96.1	98.4	98.2	99.7	98.9	99.5	98.2	97.5	97.0	97.6	97.0	95.8	99.4	97.7	96.3	97.8	97.9	98.0	98.5	99.0	96.9	98.6	98.6	99.3	99.8	100.0	100.0
Alaska	94.5	87.2	93.1	88.2	92.5	89.4	96.9	96.1	98.2	97.3	95.6		95.4	97.1	93.7	94.0	96.7	91.8	90.1	89.9	90.7	92.3	98.4	96.2	95.9	94.1	94.6	93.2	95.6	96.5	97.0	91.2	96.3	96.8	95.6	91.4
Arizona	88.0	91.9	93.8	96.1	92.9	97.2	94.8	94.0	95.7	94.9	93.8	94.9	92.9	93.6	91.8	91.9	95.3	94.6	93.0	94.8	93.4	93.2	95.1	93.9	94.6	92.7	93.5	92.2	90.2	90.9	92.7	91.3	92.3	95.0	95.1	94.3
California	90.9	88.3	93.1	92.9	91.0	86.4	95.2	94.8	95.5	95.6	94.4	89.8	91.4	91.8	91.3	90.8	88.9	87.2	82.4	80.1	85.9	87.8	86.8	86.5	90.1	86.8	85.4	86.2	86.2	83.9	84.7	91.0	92.8	94.3	91.5	88.8
Guam	97.5	94.2	97.5	95.7	94.5	94.8	99.3	99.4	100.0	100.0	100.0	99.4	98.7	98.8	99.7	99.7	98.8	100.0	97.7	100.0	99.4	99.1	99.7	99.1	98.0	100.0	100.0	99.3	97.7	97.0	98.6	98.3	95.8	97.0	96.3	94.5
Hawaii	95.9	96.0	94.9	95.1	95.8	98.1	98.5	98.9	99.1	98.7	99.6	99.6	99.5	99.4	99.0	99.8	99.0	99.7	98.2	98.0	97.3	97.9	97.5	95.7	92.9	94.4	94.8	94.9	93.7	95.0	93.9	93.4	95.6	94.2	91.9	88.7
Idaho	90.7	87.9	96.3	95.5	94.9	94.7	92.0	92.0	90.7	89.1	92.9	95.4	95.5	95.3	94.3	93.0	94.2	94.6	93.5	93.9	93.9	96.2	97.9	93.9	99.3	96.7	95.4	97.8	98.1	98.5	97.8	98.4	98.3	96.3	96.2	94.9
Nevada	97.3	98.2	96.3	97.5	96.4	100.0	98.4	98.7	98.4	98.6	99.2	98.1	96.9	95.0	97.2	98.7	98.9	95.9	98.3	97.2	94.9	97.7	95.0	94.7	95.0	91.4	90.6	94.3	93.7	94.8	91.9	93.5	91.9	93.1	91.9	95.1
Oregon	96.2	95.7	93.9	89.0	94.4	93.3	94.6	95.3	95.8	94.8	93.6	94.7	95.9	96.9	97.4	91.4	89.4	91.2	94.2	97.0	97.2	99.1	99.2	97.3	96.9	94.9	94.5	92.0	94.7	94.8	93.8	92.3	93.3	92.8	94.5	90.4
Washington	92.7	91.3	93.3	95.1	95.8	99.6	98.6	98.1	98.0	97.9	96.6	96.3	95.2	95.7	95.5	93.5	93.3	90.4	89.0	86.6	87.8	91.5	96.3	96.6	96.6	97.5	97.6	96.3	96.9	96.3	96.9	96.5	93.3	91.2	96.5	96.5
United States	94.2	92.8	93.5	93.8	94.8	96.4	97.1	97.1	96.9	96.6	95.8	95.0	95.6	94.7	94.9	94.1	94.0	93.2	91.6	91.1	91.8	92.9	92.6	92.5	92.5	91.7	90.3	89.8	91.0	91.2	91.4	92.6	92.8	92.8	92.9	91.9
Error Rate	13.1	11.9	12.2	11.7	10.8	10.9	10.5	10.4	10.3	9.9	9.8	9.8	9.3	10.7	10.8	10.3	9.7	9.2	9.8	10.7	9.9	8.9	8.7	8.3	6.6	5.9	5.8	6.0	5.6	5.0	4.4	3.8	3.8	3.4	3.2	3.7

Appendix B. State Survey Results

Table B.1a. State Reviewer Survey: Review Procedures

	State Completion Rate			Total
	Low	**Average**	**High**	
Number of respondents	160	182	103	445
Review Period				
Time given to complete reviews				
Less than 60 days	44.4	30.8	34.7	36.6
60–75 days	40.6	39.6	31.7	38.2
75 days or more	15.0	29.7	33.7	25.3
Required to meet interim deadlines	50.6	66.1	60.8	59.3
"I have sufficient time to complete the SNAP QC reviews assigned to me."				
Strongly agree	25.0	31.3	35.3	30.0
Agree	66.3	55.0	54.9	59.0
Disagree	8.1	11.0	9.8	9.7
Strongly disagree	0.6	2.8	0.0	1.4
Interview Preparation				
Review Period				
"The case files I receive from the local SNAP office typically have all of the case records and certification information I need to conduct the review."				
Strongly agree	8.2	5.5	5.9	6.6
Agree	49.1	53.9	61.8	54.0
Disagree	35.9	33.5	25.5	32.5
Strongly disagree	6.9	7.1	6.9	7.0
Contacting Clients				
Send a letter to contact	99.4	98.4	100.0	99.1
Use certified mail	45.9	45.3	59.2	48.8
Use phone calls to contact	95.6	96.7	95.2	96.0
Use text messaging to contact	5.6	11.1	8.7	8.6
Reason for not using text messages				
Discouraged by manager	8.0	11.2	10.6	9.9
Too time-consuming	3.3	3.7	2.1	3.2
Too many resources	9.3	4.4	12.8	8.1
Inability to receive messages	42.4	44.1	38.3	42.1
Not approved by State/Federal	39.1	44.1	29.8	38.9
Do not have/want to use cell phone	29.8	28.6	20.2	27.1
Other	35.8	30.4	39.4	34.5
Reach out to neighbors of contact	49.7	63.9	79.6	62.4
Reason for not reaching out to neighbors				
Discouraged by manager	6.3	9.2	0.0	6.6
Too time-consuming	6.3	4.6	9.5	6.0
Too many resources	6.3	4.6	4.8	5.4
Lack of cooperation by neighbors	42.5	27.7	52.4	38.0
Safety concerns	40.0	38.5	47.6	40.4
Other	57.5	53.9	38.1	53.6
Used the internet to contact clients	78.1	75.7	73.8	76.1
Reason for not using the internet				
Discouraged by manager	8.6	18.2	11.1	13.2
Too time-consuming	2.9	9.1	3.7	5.7
Too many resources	5.7	4.6	7.4	5.7
Unreliability of internet	22.9	52.3	37.0	38.7
Not approved by State/Federal	37.1	36.4	33.3	35.9
Other	34.3	31.8	51.9	37.7

Table B.1a. State Reviewer Survey: Review Procedures, *continued*

	State Completion Rate			Total
	Low	**Average**	**High**	
Frequency that concerns for reviewer safety affect ability to contact or locate a household				
Very rarely	54.4	48.6	44.1	49.7
Occasionally	31.9	35.2	45.1	36.3
Often	9.4	10.1	9.8	9.8
Almost always	4.4	6.2	1.0	4.3
Most effective strategy to obtain household cooperation				
Offer flexible times to meet	16.9	18.8	18.5	18.0
Offer alternative locations to meet	23.1	33.7	22.3	27.3
Notifying failure to cooperate results in change of benefits	53.1	40.9	53.4	48.2
Enlisting help from caseworker	1.3	1.7	3.9	2.0
Offering to help with childcare	0.0	0.0	0.0	0.0
Other	5.6	5.0	1.9	4.5
Frequency of turning missed appointments into completed reviews				
Very rarely	3.8	5.0	6.9	5.0
Occasionally	24.5	23.5	10.8	20.9
Often	42.8	50.3	38.2	44.8
Almost always	28.9	21.2	44.1	29.3
More than 2 contact attempts are…				
strongly encouraged	70.4	64.8	83.5	71.2
mildly encouraged	23.9	29.6	10.7	23.1
not encouraged	5.7	5.6	5.8	5.7
Conducting Interviews				
Spends overnights away from home when conducting reviews	27.7	32.4	23.8	28.7
Typical workweek schedule				
Weekdays only	84.4	94.0	80.4	87.4
Some weekends	15.6	6.0	19.6	12.6
Typical workday schedule				
Normal business hours (9am–5pm)	79.9	80.8	78.2	79.9
Other	20.1	19.2	21.8	20.1
Completing Cases				
Proportion of cases where "likely conclusion" used				
Never	11.4	7.7	10.8	9.8
1–5%	51.3	49.7	56.9	51.9
6–10%	21.5	21.0	20.6	21.1
More than 10%	15.8	21.6	11.8	17.2

Table B.1b. State Director and Supervisor Survey: QC Review Procedures

	State Completion Rate			Total
	Low	Average	High	
Number of respondents	51	49	23	123
Conducting Reviews				
"My SNAP QC staff typically receives from the local SNAP office all the information they need to conduct their reviews, including all of the case records and certification information."				
Strongly agree	21.6	14.3	22.7	18.9
Agree	54.9	59.2	63.6	58.2
Disagree	21.6	26.5	4.6	20.5
Strongly disagree	2.0	0.0	9.1	2.5
"My SNAP QC reviewers have sufficient resources to conduct reviews in languages other than English."				
Strongly agree	13.7	24.5	13.6	18.0
Agree	62.8	57.1	68.2	61.5
Disagree	21.6	16.3	13.6	18.0
Strongly disagree	2.0	2.0	4.6	2.5
More than two contact attempts are…				
strongly encouraged	65.3	55.1	59.1	60.0
mildly encouraged	26.5	32.7	27.3	29.2
not encouraged	8.2	12.2	13.6	10.8
Most effective strategy to obtain household cooperation				
Offer flexible times to meet	21.6	16.3	13.6	18.0
Offer alternative locations to meet	25.5	36.7	36.4	32.0
Notifying failure to cooperate results in change of benefits	43.1	46.9	40.9	44.3
Enlisting help from caseworker	2.0	0.0	4.6	1.6
Offering to help with childcare	0.0	0.0	0.0	0.0
Other	7.8	0.0	4.6	4.1
Management of SNAP QC				
Reviewers follow the same procedures to conduct reviews	84.3	93.9	100.0	91.0
All cases receive secondary review	84.3	87.8	86.4	86.1
Some cases receive secondary review	7.8	8.2	9.1	8.2
Provider of secondary review				
QC Director	10.6	10.6	38.1	15.7
QC Supervisor or Coordinator	97.9	93.6	90.5	94.8
Another reviewer	10.6	25.5	19.1	18.3
Other	10.6	8.5	4.8	8.7
No cases receive secondary review	7.8	4.1	4.6	5.7
Managers monitor completion rates by reviewer	74.5	77.6	82.6	77.2
"There are an adequate number of supervisors to manage the SNAP QC staff in my State."				
Strongly agree	10.0	8.3	18.2	10.8
Agree	66.0	72.9	50.0	65.8
Disagree	20.0	16.7	31.8	20.8
Strongly disagree	4.0	2.1	0.0	2.5
"Supervisors in my State have the support and tools they need to do their jobs effectively."				
Strongly agree	15.7	18.8	27.3	19.0
Agree	78.4	72.9	59.1	72.7
Disagree	3.9	6.3	13.6	6.6
Strongly disagree	2.0	2.1	0.0	1.7
State has used consultants/contractors to review QC policies and procedures and recommend changes	44.0	55.1	27.3	45.5
Effect of consultants/contractors on completion rates				
Increase	22.7	15.4	0.0	16.7
No change	45.5	61.5	50.0	53.7
Decrease	31.8	23.1	50.0	29.6
Effect of consultants/contractors on error rates				
Increase	0.0	0.0	0.0	0.0
No change	4.6	18.5	33.3	14.6
Decrease	95.5	81.5	66.7	85.5

Table B.2a. State Reviewer Survey: Incomplete Cases

	State Completion Rate			Total
	Low	Average	High	
Number of respondents	160	182	103	445
Number of incomplete cases last month				
0	61.9	50.8	68.0	58.8
1	26.5	36.5	14.6	27.8
2+	11.6	12.7	17.5	13.4
Change in incomplete cases over time [a, b]				
Increase	31.0	30.8	22.8	28.9
No change	53.5	61.7	49.1	56.2
Decrease	15.5	7.5	28.1	14.9
Reason for most recent incomplete case [a]				
Failure to cooperate	48.0	55.1	51.9	51.8
Record not found	0.7	0.0	1.2	0.5
Household not located	23.3	27.0	28.4	25.9
Household failed to cooperate	19.3	21.6	16.1	19.6
Collateral contact failed to cooperate	4.7	6.6	6.2	5.8
Refusal to cooperate	52.0	44.9	48.2	48.2
Household refused to cooperate	49.3	43.1	40.7	45.0
Collateral contact refused to cooperate	2.7	1.8	7.4	3.3
Number of households not located in a review period				
0	24.4	11.9	16.7	17.5
1	47.4	54.2	49.0	50.6
2	21.8	22.0	26.5	23.0
3+	6.4	11.3	7.8	8.7
Change over time in unable to locate households [b]				
Increase	25.0	38.5	32.1	32.9
No change	69.4	59.6	55.4	61.6
Decrease	5.6	1.8	12.5	5.5
Reason for increase in unable to locate				
More homeless	54.6	56.9	52.2	55.3
More disconnected phone numbers	81.8	86.2	100.0	87.7
More incorrect addresses	42.4	34.5	34.8	36.8
More returned mail	39.4	55.2	47.8	49.1
Less cooperation from collateral contacts	42.4	36.2	52.2	41.2
Other	39.4	32.8	56.5	39.5
Change in refusal to cooperate over time [b]				
Increase	24.7	31.8	28.1	28.7
No change	65.8	66.4	57.9	64.1
Decrease	9.6	1.9	14.0	7.2
Change in failure to cooperate over time [b]				
Increase	27.4	38.0	29.8	32.8
No change	67.1	61.1	64.9	63.9
Decrease	5.5	0.9	5.3	3.4
Change over time in the number of contact attempts necessary to complete a case [b]				
Increase	44.6	51.4	48.3	48.6
No change	48.7	45.9	48.3	47.3
Decrease	6.8	2.8	3.5	4.2
Case characteristics that may be associated with ease of completion				
Population type most often in caseload				
Urban	68.8	68.1	60.2	66.5
Rural	56.9	72.0	56.3	62.9
Suburban	47.5	54.4	34.0	47.2
Number of homeless households in typical month				
0	39.0	9.9	26.5	24.2
1	41.5	47.0	47.1	45.0
2 or more	19.5	43.1	26.5	30.8
"Most clients interviewed during the SNAP QC process are honest with information needed for their case reviews."				
Strongly agree	14.4	15.6	11.7	14.2
Agree	77.5	77.8	80.6	78.3
Disagree	5.6	5.0	7.8	5.9
Strongly disagree	2.5	1.7	0.0	1.6

[a] Universe includes only reviewers who had at least one incomplete case in the last year.
[b] Universe includes only reviewers who had at least 5 years of experience with SNAP QC.

Table B.2b. State Director and Supervisor Survey: Incomplete Cases

	State Completion Rate			Total
	Low	**Average**	**High**	
Number of respondents	51	49	23	123
Percent of incomplete cases in a typical month				
0–4	21.6	23.9	55.0	28.2
5–8	49.0	43.5	30.0	43.6
9+	29.4	32.6	15.0	28.2
Change in incomplete cases over time				
Increase	39.2	56.3	45.5	47.1
No change	43.1	33.3	31.8	37.2
Decrease	17.7	10.4	22.7	15.7
Primary reason for incomplete cases				
Failure to cooperate	60.8	65.3	40.9	59.0
Record not found	0.0	0.0	0.0	0.0
Household not located	19.6	18.4	22.7	19.7
Household failed to cooperate	27.5	34.7	9.1	27.1
Collateral contact failed to cooperate	13.7	12.2	9.1	12.3
Refusal to cooperate	35.3	30.6	59.1	37.7
Household refused to cooperate	35.3	30.6	59.1	37.7
Collateral contact refused to cooperate	0.0	0.0	0.0	0.0
Other	3.9	4.1	0.0	3.3
Change in refusal to cooperate over time				
Increase	41.2	32.7	45.5	38.5
No change	54.9	61.2	45.5	55.7
Decrease	3.9	6.1	9.1	5.7
Change in failure to cooperate over time				
Increase	45.1	40.8	50.0	44.3
No change	49.0	57.1	36.4	50.0
Decrease	5.9	2.0	13.6	5.7
"Completing SNAP QC review cases in my State is more challenging than in most other States."				
Strongly agree	22.5	2.4	13.6	13.3
Agree	40.8	50.0	27.3	41.6
Disagree	36.7	47.6	50.0	43.4
Strongly disagree	0.0	0.0	9.1	1.8
"There are more clients in my State who cannot be found during the SNAP QC process than in most other States."				
Strongly agree	12.5	0.0	4.8	6.3
Agree	47.9	44.2	23.8	42.0
Disagree	39.6	55.8	66.7	50.9
Strongly disagree	0.0	0.0	4.8	0.9
"Most clients interviewed during the SNAP QC process are honest with information needed for their case review."				
Strongly agree	4.0	6.1	31.8	9.9
Agree	88.0	89.8	63.6	84.3
Disagree	8.0	2.0	4.6	5.0
Strongly disagree	0.0	2.0	0.0	0.8

Table B.3a. State Reviewer Survey: Staff Experience and Caseload

	State Completion Rate			Total
	Low	Average	High	
Number of respondents	160	182	103	445
Years of Experience in SNAP QC				
5 years or fewer	55.6	40.1	46.6	47.2
6–10 years	22.5	36.8	26.2	29.2
11–15 years	9.4	13.7	5.8	10.3
More than 15 years	12.5	9.3	21.4	13.3
Mean	6.9	7.6	9.3	7.8
SNAP experience prior to SNAP QC	81.3	83.5	87.4	83.6
Has job duties other than SNAP QC	34.4	40.1	57.3	42.0
Number of active reviews last month				
0–5	41.5	19.7	36.0	31.3
6–8	23.7	41.6	26.0	31.5
9+	34.9	38.7	38.0	37.2
Number of negative reviews last month				
0	6.5	13.8	16.1	11.7
1–4	37.4	31.9	44.4	36.8
5+	56.1	54.4	39.5	51.5
Mean number of reviews last month				
Active	7.0	7.6	7.8	7.4
Negative	5.4	6.1	5.0	5.6
Other	1.7	5.0	1.2	2.8
Change in SNAP QC caseload over time [a]				
Increase	39.7	42.7	33.3	39.6
No change	41.1	45.5	40.4	42.9
Decrease	19.2	11.8	26.3	17.5
Ever assigned additional reviews to assist backlogged reviewers or reviewers on extended leave	69.4	80.1	74.5	75.0
About once a year	43.6	25.2	44.7	35.9
More than once a year	19.1	13.3	15.8	15.8
Some months	16.4	39.2	22.4	27.7
6+ months per year	20.9	22.4	17.1	20.7

[a] Universe includes only reviewers who had at least 5 years of experience with SNAP QC.

Table B.3b. State Director and Supervisor Survey: Experience and Caseload

	State Completion Rate			Total
	Low	Average	High	
Total number of respondents	51	49	23	123
Number of SNAP QC directors	13	14	8	35
Number of SNAP QC supervisors	38	35	15	88
Years of experience with SNAP QC				
5 years or fewer	23.5	28.6	17.4	24.4
6–10	25.5	28.6	13.0	24.4
11–15	17.7	18.4	21.7	18.7
More than 15 years	33.3	24.5	47.8	32.5
Mean	13.5	10.7	17.4	13.1
Experience with SNAP prior to QC	82.4	81.6	100.0	85.4
Has job duties outside of SNAP QC	52.9	44.9	78.3	54.5
Time spent on SNAP (vs. other programs)				
<50%	13.7	12.2	8.7	12.2
50–99%	39.2	32.7	69.6	42.3
100%	47.1	55.1	21.7	45.5
Number of SNAP QC reviewers (directors only)				
<=10	23.1	14.3	57.1	26.5
11–14	38.5	50.0	28.6	41.2
15+	38.5	35.7	14.3	32.4
Mean	13.8	13.7	10.9	13.1
Change in number of SNAP QC reviewers over last 5 years (directors only)				
Increase	23.1	7.1	42.9	20.6
No change	7.7	28.6	14.3	17.7
Decrease	69.2	64.3	42.9	61.8
"Staff is large enough to maintain quality review processes."				
Strongly agree	27.5	38.8	22.7	31.2
Agree	56.9	42.9	59.1	51.6
Disagree	13.7	16.3	4.6	13.1
Strongly disagree	2.0	2.0	13.6	4.1
"My SNAP QC staff has sufficient time to complete the reviews assigned to them."				
Strongly agree	37.3	40.8	31.8	37.7
Agree	56.9	53.1	59.1	55.7
Disagree	5.9	6.1	9.1	6.6
Strongly disagree	0.0	0.0	0.0	0.0

Table B.4a. State Reviewer Survey: Training and Tools

	State Completion Rate			Total
	Low	**Average**	**High**	
Number of respondents	160	182	103	445
Reviewers receive training on SNAP QC	91.2	85.2	90.3	88.5
Training frequency				
Once	17.4	18.1	5.4	14.8
Ongoing—weekly, monthly	14.6	25.8	11.8	18.4
Ongoing—1–2 times per year	16.0	12.9	35.5	19.4
As-needed	52.1	43.2	47.3	47.5
Training topics				
310 Handbook	95.2	91.6	95.7	93.9
Eligibility and certification	77.2	72.3	73.1	74.3
Procedural components	87.6	86.5	88.2	87.3
Interview techniques	60.0	58.1	63.4	60.1
Household location	53.8	52.9	49.5	52.4
State-specific policy	76.6	68.4	75.3	73.0
Likely conclusion	73.1	74.2	72.0	73.3
Other	23.5	18.7	17.2	20.1
Training format				
In-person (formal)	62.8	56.8	57.0	59.0
Online independent	22.1	24.5	20.4	22.7
Online group	16.6	38.1	33.3	29.0
Conference call	43.5	47.7	40.9	44.5
In person (informal)	71.0	72.9	76.3	73.0
One-on-one	45.5	50.3	49.5	48.4
Peer mentoring	31.0	49.7	38.7	40.2
Individual study	64.8	64.5	59.1	63.4
Other	11.0	7.7	8.6	9.2
Training conductors				
QC director	53.8	26.5	50.5	42.2
QC supervisor or coordinator	88.3	78.7	87.1	84.2
Reviewer	15.9	9.0	25.8	15.5
Regional Office personnel	22.1	26.5	24.7	24.4
Contractor	33.1	25.8	12.9	25.5
Other	8.3	15.5	15.1	12.7
Independent (no instructor)	0.0	2.6	1.1	1.3
Change in training over time [a]				
Increase	18.2	48.9	29.6	34.3
No change	51.5	31.1	55.6	43.8
Decrease	30.3	20.0	14.8	21.9
Format of notification of change				
Email alert	89.4	86.8	91.3	88.8
State manual page change	38.8	44.0	51.5	43.8
Memo	56.3	50.0	48.5	51.9
Formal training	44.4	41.2	50.5	44.5
Conference call	34.4	37.4	30.1	34.6
Other	12.5	13.2	9.7	12.1
Not notified	1.3	0.0	0.0	0.5
"The training I received provided me with the tools and knowledge I need to effectively complete a SNAP QC review."				
Strongly agree	30.0	31.9	40.8	33.3
Agree	62.5	50.6	51.5	55.1
Disagree	6.3	14.8	5.8	9.7
Strongly disagree	1.3	2.8	1.9	2.0

[a] Universe includes only reviewers who had at least 5 years of experience with SNAP QC.

Table B.4a. State Reviewer Survey: Training and Tools, *continued*

	State Completion Rate			Total
	Low	**Average**	**High**	
Additional training that would be helpful				
310 Handbook	51.9	51.1	45.6	50.1
Eligibility and certification	22.5	23.6	18.5	22.0
Procedural components	30.6	37.9	33.0	34.2
Interview techniques	13.1	16.5	14.6	14.8
Household location	23.8	25.3	21.4	23.8
State-specific policy	36.3	36.3	33.0	35.5
Likely conclusion	43.1	37.9	38.8	40.0
Other	12.5	5.0	12.6	9.4
Tools				
Frequency using 310 Handbook for reviews				
Very rarely	6.9	7.7	4.9	6.7
Occasionally	31.9	21.4	20.4	24.9
Often	41.9	33.0	53.4	40.9
Almost always	19.4	37.9	21.4	27.4
State has other supplemental materials	81.5	68.2	73.3	74.1
Frequency of use of supplemental material				
Very rarely	7.0	6.6	1.4	5.6
Occasionally	29.9	26.2	40.5	31.0
Often	42.5	39.3	32.4	39.0
Almost always	20.5	27.9	25.7	24.5
State uses automated FNS-380 worksheet	72.3	57.9	82.5	68.8
Effect of automated *FNS-380* worksheet				
Easier	33.9	41.8	45.9	40.0
Same	56.3	50.5	43.5	50.7
More difficult	9.8	7.8	10.6	9.3
Additional tools or materials available	80.5	76.8	79.6	78.8

Table B.4b. State Director and Supervisor Survey: Training and Tools

	State Completion Rate			Total
	Low	**Average**	**High**	
Number of respondents	51	49	23	123
"Overall, my SNAP QC staff has the tools and knowledge they need to correctly determine if a case is complete or incomplete."				
Strongly agree	51.0	53.1	59.1	53.3
Agree	47.1	46.9	40.9	45.9
Disagree	2.0	0.0	0.0	0.8
Strongly disagree	0.0	0.0	0.0	0.0
Training				
Training topics				
FNS 310 Handbook	100.0	100.0	95.2	99.2
Eligibility and certification	87.8	91.5	85.7	88.9
Procedural components	98.0	97.9	95.2	97.4
Interview techniques	75.5	89.4	90.5	83.8
Household location	71.4	78.7	76.2	75.2
State-specific policy	87.8	83.0	85.7	85.5
Likely conclusion	95.9	93.6	95.2	94.9
Other	26.5	17.0	33.3	23.9
Training format				
In person (formal)	77.6	78.7	76.2	77.8
Online independent	26.5	14.9	19.1	20.5
Online group	18.4	23.4	19.1	20.5
Conference call	53.1	63.8	66.7	59.8
In person (informal)	81.6	85.1	90.5	84.6
One-on-one	87.8	87.2	90.5	88.0
Peer mentoring	57.1	80.9	61.9	67.5
Individual study	83.7	91.5	71.4	84.6
Other	14.3	8.5	28.6	14.5
Training conductors				
QC director	57.1	31.9	61.9	47.9
QC Supervisor or coordinator	91.8	91.5	85.7	90.6
Reviewer	14.3	12.8	23.8	15.4
Regional Office personnel	34.7	36.2	52.4	38.5
Contractor	26.5	29.8	9.5	24.8
Other	16.3	12.8	23.8	16.2
Independent (no instructor)	0.0	2.1	0.0	0.9
Training planners				
QC director	67.4	46.8	66.7	59.0
QC supervisor or coordinator	77.6	80.9	71.4	77.8
Reviewer	4.1	10.6	0.0	6.0
Regional Office personnel	2.0	6.4	14.3	6.0
Contractor	4.1	2.1	0.0	2.6
Other	2.0	6.4	4.8	4.3
Independent (no instructor)	0.0	0.0	0.0	0.0
Training frequency				
Once	6.1	8.9	5.0	7.0
Ongoing—weekly, monthly	22.5	37.8	25.0	29.0
Ongoing—twice yearly	8.2	0.0	0.0	3.5
Ongoing—yearly	8.2	6.7	30.0	11.4
As needed	55.1	46.7	40.0	49.1
Change in training over time				
Increase	49.0	46.8	50.0	48.3
No change	38.8	40.4	50.0	41.4
Decrease	12.2	12.8	.	10.3

	State Completion Rate			Total
	Low	**Average**	**High**	
Format of notification of policy change				
Email alert	86.3	85.7	73.9	83.7
State manual page change	49.0	55.1	47.8	51.2
Memo	54.9	65.3	52.2	58.5
Formal training	58.8	61.2	52.2	58.5
Conference call	62.8	63.3	43.5	59.4
Other	11.8	14.3	4.4	11.4
Not notified	0.0	0.0	0.0	0.0
Responsible party for notification of policy change				
QC director	54.9	30.6	61.9	46.3
QC supervisor or coordinator	35.3	51.0	19.1	38.8
State policy office personnel	7.8	18.4	14.3	13.2
Regional Office personnel	2.0	0.0	4.8	1.7
No one	0.0	0.0	0.0	0.0
Tools				
State-specific/supplemental materials	90.2	81.6	71.4	83.5
Additional tools available to reviewers	92.0	87.8	72.7	86.8
Staff use automated FNS-380	72.6	69.4	81.8	73.0
Effect of FNS 380 on ability to complete reviews				
Easier	50.0	44.1	55.6	48.9
No change	13.9	5.9	11.1	10.2
More difficult	36.1	50.0	33.3	40.9

Table B.5a. State Reviewer Survey: Staff Perceptions Related to SNAP QC Completion

	State Completion Rate			Total
	Low	Average	High	
Number of respondents	160	182	103	445
SNAP QC Completion Accountability and Priorities				
"Obtaining high completion rates for SNAP QC reviews is a priority for my office."				
Strongly agree	51.6	47.0	68.0	53.5
Agree	45.3	48.6	30.1	43.1
Disagree	1.3	3.3	0.0	1.8
Strongly disagree	1.9	1.1	1.9	1.6
"I am personally held accountable when I have low completion rates for SNAP QC reviews."				
Strongly agree	24.5	18.9	34.0	24.5
Agree	45.9	55.4	43.7	49.2
Disagree	25.8	21.7	16.5	22.0
Strongly disagree	3.8	4.0	5.8	4.4
Intensity of SNAP QC Completion Efforts				
"I go the extra mile to complete SNAP QC reviews."				
Strongly agree	57.2	60.4	71.8	61.9
Agree	40.3	39.0	27.2	36.7
Disagree	1.9	0.6	1.0	1.1
Strongly disagree	0.6	0.0	0.0	0.2
"During the SNAP QC review process, I make concerted efforts to speak with collateral contacts of a client who is uncooperative or hard to locate."				
Strongly agree	47.8	57.7	68.9	56.7
Agree	47.2	38.7	31.1	40.0
Disagree	4.4	3.7	0.0	3.1
Strongly disagree	0.6	0.0	0.0	0.2
"During the SNAP QC review process, I come up with creative solutions to locate hard-to-reach clients."				
Strongly agree	39.6	43.6	50.0	43.6
Agree	49.1	52.2	46.1	49.5
Disagree	10.1	3.7	3.9	6.1
Strongly disagree	1.3	0.6	0.0	0.7
"During the SNAP QC review process, I come up with creative solutions to convert uncooperative clients."				
Strongly agree	30.3	36.8	42.7	35.9
Agree	49.7	55.8	47.6	51.5
Disagree	19.4	6.8	7.8	11.6
Strongly disagree	0.7	0.6	1.9	1.0
"My office environment and managers encourage sharing information about new approaches with other SNAP QC reviewers to expand their tools for completing SNAP QC reviews."				
Strongly agree	36.3	30.2	57.3	38.7
Agree	48.4	55.0	36.9	48.4
Disagree	9.6	10.4	4.9	8.8
Strongly disagree	5.7	4.4	1.0	4.1

Table B.5b. State Director and Supervisor Survey: Staff Perceptions Related to SNAP QC Completion Rates

	State Completion Rate			Total
	Low	Average	High	
Number of respondents	51	49	23	123
SNAP QC Completion Goals				
Achievable completion rate				
Less than 90	21.6	20.0	15.0	19.8
90–94	51.0	42.2	25.0	43.1
95–97	27.5	33.3	35.0	31.0
More than 97	0.0	4.4	25.0	6.0
"I am currently satisfied with the completion rate for SNAP QC reviews among my staff."				
Strongly agree	14.3	16.3	31.8	18.3
Agree	71.4	61.2	68.2	66.7
Disagree	14.3	22.5	0.0	15.0
Strongly disagree	0.0	0.0	0.0	0.0
SNAP QC Completion Accountability and Priorities				
"Obtaining high completion rates for SNAP QC reviews is a priority for my office."				
Strongly agree	36.0	34.0	45.5	37.0
Agree	58.0	59.6	45.5	56.3
Disagree	6.0	6.4	9.1	6.7
Strongly disagree	0.0	0.0	0.0	0.0
"I am personally held accountable when the employees I supervise have low completion rates for their reviews."				
Strongly agree	7.8	10.6	36.4	14.2
Agree	47.1	53.2	31.8	46.7
Disagree	35.3	23.4	13.6	26.7
Strongly disagree	0.0	4.3	13.6	4.2
Do not supervise employees	9.8	8.5	4.6	8.3
"I am personally held accountable for the integrity of the SNAP QC process."				
Strongly agree	25.0	29.2	50.0	31.4
Agree	60.4	52.1	36.4	52.5
Disagree	14.6	16.7	9.1	14.4
Strongly disagree	0.0	2.1	4.6	1.7
Intensity of SNAP QC Completion Efforts				
"The reviewers in my State go the extra mile to complete SNAP QC reviews."				
Strongly agree	57.1	41.7	54.6	50.4
Agree	32.7	52.1	45.5	42.9
Disagree	10.2	6.3	0.0	6.7
Strongly disagree	0.0	0.0	0.0	0.0
"During the SNAP QC review process, the reviewers in my State make concerted efforts to speak with collateral contacts of a client who is uncooperative or hard to locate."				
Strongly agree	58.3	42.9	59.1	52.1
Agree	39.6	57.1	40.9	47.1
Disagree	2.1	0.0	0.0	0.8
Strongly disagree	0.0	0.0	0.0	0.0
"During the SNAP QC review process, the reviewers in my State come up with creative solutions to locate hard-to-reach clients."				
Strongly agree	36.2	33.3	54.6	38.5
Agree	57.5	56.3	45.5	54.7
Disagree	6.4	10.4	0.0	6.8
Strongly disagree	0.0	0.0	0.0	0.0
"The reviewers in my State routinely share information about new approaches with each other to expand their tools for completing case reviews."				
Strongly agree	33.3	36.7	50.0	37.8
Agree	58.3	57.1	50.0	56.3
Disagree	8.3	6.1	0.0	5.9
Strongly disagree	0.0	0.0	0.0	0.0

Appendix C. Regional Office Survey Results

Table C.1. Federal QC Reviewer Survey: Review Procedures

	Total
Number of respondents	29
Case assignment	
Number of States in regular caseload	
1	20.7
2	48.3
3 or more	31.0
FQCRs who have reviewed an incomplete case in the past year	*96.4*
FQCRs who review at least one incomplete case in a typical month	*82.8*
Time to review complete active cases	
1 hour or less	27.6
1–2 hours	41.4
2–3 hours	13.8
Missing	17.2
Time to review incomplete active cases	
1 hour or less	65.5
1–2 hours	17.2
2–3 hours	3.4
Missing	13.8
FQCRs have sufficient time to complete reviews	
Agree	48.3
Disagree	51.7
Change in amount of time needed to review cases in past 5 years	
Increase	51.7
No change	34.5
Decrease	13.8
Case review preparation	
FQCRs have access to State systems	
No	96.6
Yes	3.4
How helpful would it be to have State system access when completing reviews? (among FQCRs who do not have access)	
Very helpful	32.1
Somewhat helpful	35.7
Not very helpful	14.3
Not at all helpful	17.9
Active complete case review process	
The extent to which active case review steps have changed	
A lot	51.7
Some	34.5
A little	13.8
Not at all	0.0
Reason that review steps have changed (among FQCRs who report some or a lot of changes)	
New guidance from FNS National Office	84.0
New guidance from Regional Office administrative branch	20.0
New guidance from Regional Office branch chief	32.0
State policy change	44.0
New tasks required	88.0
New automated system	92.0
Other	16.0

Table C.1. Federal QC Reviewer Survey: Review Procedures, continued

	Total
Frequency that States use "likely conclusion" to complete cases	
At least once a month	41.4
Once every few months	27.6
Once a year	0.0
This is mostly dependent on the SQCR	10.3
This is mostly dependent on the State	13.8
Never used "likely conclusion"	6.9
Active incomplete case review process	
Mean number of incomplete active cases per month	*12.1*
Change in the number of incomplete cases per month since FQCR began doing QC reviews	
Increase	41.4
No change	41.4
Decrease	17.2
Case files are usually complete (among FQCRs who reviewed at least one incomplete case last year)	
Almost always	37.0
Often	37.0
Occasionally	11.1
Very rarely	7.4
Depends on SQCR	7.4
Thorough documentation of review process was received (among FQCRs who reviewed at least one incomplete case last year)	
Almost always	37.0
Often	44.4
Occasionally	11.1
Mostly dependent on the SQCR	7.4
Mostly dependent on the State	0.0
FQCR requests additional case file information from the State (among FQCRs who reviewed at least one incomplete case last year)	
Almost always	0.0
Often	3.7
Occasionally	48.1
Very rarely	40.7
Mostly dependent on the SQCR	0.0
Mostly dependent on the State	7.4
Frequency of attempts to complete cases (among FQCRs who reviewed at least one incomplete case last year)	
No attempt to complete a case in the past year	48.1
Less than once a year	11.1
At least every 4–6 months	11.1
At least every 2–3 months	18.5
At least once a month	11.1
Reason attempts not made to complete cases (among FQCRs who reviewed at least one incomplete case last year)	
Lack of time	30.4
Not required	30.4
Other	39.1
Steps taken to complete an incomplete case (among FQCRs who attempted to complete at least one incomplete case last year)	
Phone call to household	42.9
Letter to household	7.1
In-person contact with household	21.4
Phone call to collateral contact	71.4
Letter to collateral contact	7.1
In-person contact with collateral contact	21.4
Contact with eligibility worker	7.1
Other	14.3

Table C.1. Federal QC Reviewer Survey: Review Procedures, *continued*

	Total
Frequency of disagreement with incomplete disposition (among FQCRs who reviewed at least one incomplete case last year)	
0–24% of incomplete cases	100.0
25–100% of incomplete cases	0.0
Frequency that FQCRs attempts to complete cases are successful	
Less than 25% of the time	78.6
25–49% of the time	0.0
50–74% of the time	14.3
75% of the time or more	7.1
Secondary reviews of findings	
Cases receive secondary review	
All cases	20.7
Some cases	69.0
No cases	10.3
Reasons for secondary reviews (among FQCRs reporting at least some secondary reviews)	
Disagree cases	61.5
Incomplete cases	0.0
Cases from a certain State	3.8
Cases reviewed by new staff	23.1
Random sample of cases	69.2
Other	7.7
QC staff member who conducts secondary reviews (among FQCRs reporting at least some secondary reviews)	
QC director	3.8
QC supervisor/coordinator	73.1
Another FQCR	19.2
Other	3.8
Resolution of differences between State and Federal findings	
Feedback provided to State outside of ROQCTs	
Yes	69.0
No	31.0
QC staff member who provides State feedback (among FQCRs reporting at least some feedback)	
Regional Office Branch Chief	30.0
QC supervisor/coordinator	100.0
FQCR who reviewed the case	55.0
Another FQCR	0.0

Table C.2. Federal QC Reviewer Survey: Federal SNAP QC Staff

	Total
Number of respondents	29
Staff experience	
Years of experience in Federal SNAP QC	
Up to 5 years	34.5
6 to 10 years	37.9
11 to 15 years	13.8
More than 15 years	13.8
Experience in State-level SNAP QC	
Yes	31.0
No	69.0
Staff workload	
Mean number of active cases per month	*48.2*
Mean number of negative cases per month	*28.2*
Change in number of SNAP QC reviews in past 5 years	
Increase	62.1
No change	34.5
Decrease	3.4
Percentage of time spent on SNAP QC	
0–49%	17.2
50–74%	24.1
75–99%	27.6
100%	31.0
FQCRs assigned additional reviews	
At least every other month	24.1
Some months	17.2
Once per year	31.0
Never	27.6

Table C.3. Federal QC Reviewer Survey: Tools and Training

	Total
Number of respondents	29
Training	
Frequency of FQCR training	
Once	27.6
Weekly/monthly	6.9
Yearly	6.9
As needed	31.0
Other	10.3
Never	17.2
Conductor of FQCR training	
Regional branch chief	6.9
QC coordinator	72.4
FQCR	27.6
Contractor	0.0
Other	31.0
Format of FQCR training	
Formal in-person training	58.6
Independent tutorial online	6.9
Group online webinar	17.2
Conference call	34.5
Informal in-person meetings	51.7
One-on-one training with a supervisor	20.7
Peer mentoring	51.7
Individual study with written materials	69.0
Topics covered during training	
FNS 310 Handbook	82.8
FNS 315 Handbook	41.4
SNAP eligibility and certification	65.5
Procedural aspects of QC reviews	69.0
Interview techniques	6.9
Household location techniques	10.3
State-specific policy, including State options and waivers	44.8
Likely conclusion as a means of case completion	65.5
Other	24.1
Training was effective?	
Strongly agree	17.2
Agree	58.6
Disagree	13.8
Strongly disagree	10.3
Change in the amount of FQCR training since FQCR began job	
Increase	3.4
Decrease	51.7
No change	44.8
Source of notification of new State policy	
Regional Office policy branch	65.5
Regional Office QC branch chief	62.1
State QC director	20.7
Other FQCRs	34.5
Online resources	62.1
On one's own	48.3
None	10.3

Table C.3. Federal QC Reviewer Survey: Tools and Training, continued

	Total
Tools	
Use of automated FNS 380	
Almost always	44.8
Often	27.6
Occasionally	10.3
Very rarely	3.4
Never	13.8
Effect of using automated 380 on ability to complete reviews (among FQCRs who use it at least occasionally)	
Reviews are easier with automated 380	12.5
Reviews are more difficult with automated 380	20.8
No change	66.7
FQCR use of FNS 310 Handbook	
Almost always	62.1
Often	34.5
Occasionally	3.4
Very rarely	0.0
FQCR use of State-specific QC materials	
Yes	86.2
No	13.8
FQCR use of FNS 315 Handbook	
Almost always	13.8
Often	10.3
Occasionally	27.6
Very rarely	48.3

Table C.4. Federal QC Reviewer Survey: Staff Perceptions Related to SNAP QC

	Total
Number of respondents	29
Does your office place priority on reviewing incomplete cases over cases with other dispositions?	
Yes	13.8
No, my office prioritizes reviewing cases other than incomplete cases	3.4
No, my office priorities cases equally, regardless of disposition code	82.8
Monitoring State SNAP QC quality is a priority for my office	
Strongly agree	31.0
Agree	51.7
Disagree	6.9
Strongly disagree	10.3
The Regional Office environment encourages sharing information about new approaches with other FQCRs	
Strongly agree	17.2
Agree	55.2
Disagree	17.2
Strongly disagree	10.3
I go the extra mile to complete SNAP QC reviews coded as "incomplete" by the State reviewer	
Strongly agree	27.6
Agree	34.5
Disagree	27.6
Strongly disagree	3.4
This does not apply to me	6.9
I enjoy my work	
Strongly agree	24.1
Agree	51.7
Disagree	17.2
Strongly disagree	6.9
I work hard	
Strongly agree	69.0
Agree	31.0
Disagree	0.0
Strongly disagree	0.0
I feel supported by management	
Strongly agree	24.1
Agree	48.3
Disagree	20.7
Strongly disagree	6.9

Appendix D. Administrative Data Analysis Tables

Table D.1. SNAP Household Demographic Information by QC Review Completion Status and State: FY 2010–FY 2012

Characteristic	Iowa Complete	Iowa Incomplete	Kentucky Complete	Kentucky Incomplete	Mississippi Complete	Mississippi Incomplete	Ohio Complete	Ohio Incomplete	Oklahoma Complete	Oklahoma Incomplete	Total[a] Complete	Total[a] Incomplete
Total Households	2,877	356	3,855	249	3,673	99	3,899	329	3,375	96	17,679	1,129
Household Size												
1	48.0	46.1	44.6	36.1	44.5	39.4	47.4	45.0	43.7	50.0	45.6	43.3
2–3	32.1	31.7	36.5	41.4	32.9	40.4	32.8	34.0	33.8	35.4	33.7	35.6
4+	19.9	22.2	18.9	22.5	22.6	20.2	19.7	21.0	22.4	14.6	20.7	21.1
Mean	2.2	2.3	2.2	2.5	2.3	2.3	2.2	2.3	2.3	2.0	2.3	2.3
Household Composition												
With children	45.5	50.0	44.7	54.6	48.5	54.5	45.7	48.6	49.4	42.7	46.8	50.4
Preschool-aged children (0–4)	24.8	28.9	21.9	25.3	24.5	30.3	23.0	26.1	26.6	21.9	24.1	26.8
School-aged children (5–17)	32.7	36.0	32.6	39.8	37.2	44.4	34.9	34.3	36.8	31.3	34.9	36.7
Single adult with children	26.4	30.3	25.4	30.9	31.6	25.3	28.1	27.4	30.5	32.3	28.4	29.3
No children	54.5	50.0	55.3	45.4	51.5	45.5	54.3	51.4	50.6	57.3	53.3	49.6
With older individuals (60+)	12.0	6.7	15.5	7.2	14.6	4.0	15.7	6.7	14.2	5.2	14.5	6.5
No older individuals	88.0	93.3	84.5	92.8	85.4	96.0	84.3	93.3	85.8	94.8	85.5	93.5
Age of Household Head												
<25	17.0	26.4	11.9	18.1	12.5	23.2 [1]	12.4	25.2	14.4	29.2	13.4	24.2
25–44	47.1	49.4	46.8	59.8	48.6	56.6	44.1	52.0	47.3	54.2	46.7	53.5
45–59	24.3	18.0	26.8	17.3	25.0	18.2	28.3	17.3	24.5	11.5	25.9	17.1
60+	11.7	6.2	14.5	4.8	13.9	2.0	15.2	5.5	13.7	5.2	13.9	5.2
Metropolitan Status[b]												
Metropolitan	20.6	22.8	32.8	53.4	38.3	46.5	75.3	88.1	21.6	28.1	39.2	51.1
Micropolitan	11.6	11.2	33.5	15.7	33.3	38.4	20.4	9.4	35.4	28.1	27.4	15.5
Rural	67.7	66.0	33.7	30.9	28.4	15.2	4.2	2.4	43.0	43.8	33.4	33.4

[a] Totals are based on States with data available from both complete and incomplete cases

[b] Metropolitan areas contain a core urban area of 50,000 or more people, while a micropolitan area contains an urban core of at least 10,000 (but fewer than 50,000) people. All remaining areas were considered rural: http://www.census.gov/population/metro/data/def.html (Core-Based Statistical Areas, 2013)

Table D.2. Household Economic Information by SNAP QC Completion Status and State: FY 2010–FY 2012

Characteristic	Iowa Complete	Iowa Incomplete	Kentucky Complete	Kentucky Incomplete	Mississippi Complete	Mississippi Incomplete	Ohio Complete	Ohio Incomplete	Oklahoma Complete	Oklahoma Incomplete	Total[a] Complete	Total[a] Incomplete
Total Households	2,877	356	3,855	249	3,673	99	3,899	329	3,375	96	17,679	1,129
Gross Countable Income as a Percentage of Poverty Guideline												
<=100%	80.2	–	89.2	85.9	90.4	84.9	81.2	83.6	88.8	86.4	87.2	84.9
0%	17.1	–	21.0	29.3	21.2	26.3	18.1	43.5	20.8	47.9	20.2	37.3
1–50%	23.0	–	20.5	23.7	21.4	26.3	19.3	10.6	23.1	15.6	21.0	17.5
51–100%	40.1	–	47.7	32.9	47.8	32.3	43.8	29.5	44.9	22.9	46.0	30.1
101–130%	14.6	–	9.4	14.1	9.3	14.1	13.8	10.9	10.6	13.5	10.8	12.7
131%+	5.2	–	1.4	0.0	0.4	1.0	5.0	5.5	0.5	0.0	1.9	2.5
Income												
Average gross monthly countable income	$809	–	$706	$649	$691	$703	$789	$665	$696	$483	$736	$642
Average net monthly countable income	$393	–	$392	$458	$404	$369	$352	–	$365	$247	$380	$392
Households With Countable—												
Earned Income[b]	41.2	–	24.4	31.5	27.8	50.5	27.5	34.0	29.8	26.0	27.3	34.3
No earned income	58.8	–	75.6	68.5	72.2	49.5	72.5	66.0	70.2	74.0	72.7	65.7
Unearned income	59.1	–	62.2	46.0	61.6	44.4	65.3	36.2	58.3	15.6	62.0	37.8
No unearned income	40.9	–	37.8	54.0	38.4	55.6	34.7	63.8	41.7	84.4	38.0	62.2
TANF income	8.6	5.1	6.4	3.6	3.9	4.0	8.5	0.3	3.1	1.0	6.1	2.9
No TANF income	91.4	94.9	93.6	96.4	96.1	96.0	91.5	99.7	96.9	99.0	93.9	97.1
SSI	18.0	7.3	31.6	12.9	28.0	13.1	24.7	8.5	21.5	8.3	25.2	9.5
No SSI	82.0	92.7	68.4	87.1	72.0	86.9	75.3	91.5	78.5	91.7	74.8	90.5
Social Security income	22.6	9.3	26.6	16.1	24.4	8.1	27.1	7.9	24.1	10.4	25.1	10.4
No Social Security income	77.4	90.7	73.4	83.9	75.6	91.9	72.9	92.1	75.9	89.6	74.9	89.6
Monthly SNAP Benefit Amount												
$50 or less	9.7	7.3	6.8	5.6	8.8	5.1	10.4	5.5	9.6	5.2	9.0	6.0
$51–100	7.1	6.7	11.8	3.2	14.8	5.1	5.4	3.1	9.5	5.2	9.8	4.6
$101–200	40.0	42.4	36.1	36.5	29.4	42.4	40.0	43.1	32.1	52.1	35.4	42.1
$201–400	22.3	24.4	24.5	27.7	23.1	21.2	21.3	25.4	24.4	17.7	23.1	24.6
$401+	20.9	19.1	20.8	26.9	23.9	26.3	22.9	22.9	24.5	19.8	22.7	22.6
Maximum benefit received[c]	34.5	36.2	31.8	41.0	29.3	36.4	36.1	48.3	33.3	56.3	33.0	42.5
Mean	$272	$271	$271	$318	$279	$295	$283	$300	$289	$282	$279	$293

[a] Totals are based on States with data available from both complete and incomplete cases

[b] Including wages and salaries, self-employment, and other earned income

[c] Very few households reported benefit amounts greater than the maximum allotment. These households were included in the maximum benefit category

Note: – indicates data not available

Table D.3. Administrative Information by SNAP QC Completion Status and State: FY 2010–FY 2012

Characteristic	Iowa		Kentucky		Mississippi		Ohio		Oklahoma		Total[a]	
	Complete	Incomplete	Complete	Incomplete	Complete	Incomplete	Complete	Incomplete	Complete	Incomplete	Complete	Incomplete
Total households	2,877	356	3,855	249	3,673	99	3,899	329	3,375	96	17,679	1,129
Reporting Requirements												
Simplified reporting	99.8	–	96.9	98.4	89.0	96.0	86.3	–	97.7	100.0	94.5	98.2
Change reporting	0.2	–	0.2	1.6	1.3	4.0	0.0	–	1.8	0.0	1.1	1.8
Other/Waiver	0.0	–	2.9	0.0	9.7	0.0	13.7	–	0.4	0.0	4.4	0.0
Most Recent Action												
Certification	31.2	–	35.3	42.5	33.6	38.9	30.4	–	53.3	73.4	40.3	48.5
Recertification	68.8	–	64.7	57.5	66.4	61.1	69.6	–	46.7	26.6	59.7	51.5
Timing of Most Recent Action												
0–<3 months	49.3	44.9	38.7	42.5	34.8	42.1	36.2	–	28.8	50.0	37.4	44.4
3–<6 months	40.0	50.7	39.1	46.7	32.9	31.6	32.4	–	27.5	37.2	34.8	45.5
6–<12 months	10.5	4.4	19.3	6.3	23.5	25.3	30.6	–	32.5	11.7	21.8	8.4
12+ months	0.2	0.0	2.9	4.6	8.8	1.1	0.8	–	11.3	1.1	6.0	1.7
Mean months	2.9	2.9	4.3	3.8	5.5	4.0	4.3	–	6.2	3.2	4.8	3.4

[a] Totals are based on States with data available from both complete and incomplete cases

Note: – indicates data not available