



December 30, 2016

Food and
Nutrition
Service

Park Office
Center

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SUBJECT: Quality Control Policy Memo: 17-01
Quality Control Procedural Clarifications and Federal Access to State
Systems

TO: Regional Directors
Supplemental Nutrition Assistance Program (SNAP)
All Regions

The Quality Control (QC) system is an integral component of FNS's responsibility to effectively administer the Supplemental Nutrition Assistance Program (SNAP) to ensure families receive critical nutrition assistance while practicing strong public stewardship. It is crucial that the QC processes at the State and Federal level report statistically valid results that are fully substantiated by documentation in the case file. In order to ensure efficient and effective Program delivery, this memorandum clarifies existing statutory, regulatory and policy guidance regarding the documentation required for a QC case file, second party reviews, State quality control requests for policy interpretations, and requirements for Federal access to State systems.

FNS appreciates State participation in trainings on the FNS 310 Handbook revisions both at the 2016 National Association for Program Information and Performance Measurement (NAIPM) conference and at regional office trainings held throughout the country in October and November 2016. This clarification memorandum is in response to inquiries received at those trainings.

Required Documentation

During recent integrity reviews of all SNAP agencies, FNS found that the QC case files submitted for Federal re-review lack sufficient documentation to substantiate the case findings of the State Quality Control Reviewer (SQCR). States are required to submit all documentation that details the information gathered as part of the QC review, relevant information from the certification case file and any case notes that detail discussions about cases selected for QC review. This guidance does not override QC Policy Memorandum 09-02 or the documentation requirements in the FNS 310 Handbook and in SNAP regulations at 7 CFR 275.12, but rather provides additional clarification. It is not possible to provide an exhaustive list of required documentation because of differing procedures and forms used by States, and because waivers granted by FNS impact what documentation is required. The QC case file submitted to FNS must include, at a minimum, but is not limited to:

- All documentation submitted by the household and obtained by the State which is necessary to examine the household's eligibility and benefit allotment in the sample month, relative to their last certification or recertification action, including the most recent household application, conferment of categorical eligibility and any verifications obtained and used by another program which are pertinent to the SNAP case.
- All correspondence and records of field reviews and collateral contacts used to obtain verification of each element. This also includes all case notes completed by the SQCR regarding case findings and all discussions with policy officials.
- Documentation of any changes that have an impact on the disposition or finding of the SQCR's case, especially when the changes are made to verification source(s) or to the way the element is verified. Changes in documentation that have the effect of altering a finding for a particular element or the disposition of the case shall also be documented in the case file transmitted to FNS. A change, as referenced here, means a change made after the SQCR completes their first-party review and submits the review to a supervisor or other QC official for second party or supervisory review prior to the transmission of the findings to FNS.

Second Party Reviews

FNS Quality Control Memorandum 16-02 clarified procedures and guidelines for second party reviews but FNS has received multiple requests to provide additional clarification. As the memorandum explains, second party reviews must be performed in such a way to ensure that QC work is done correctly following SNAP policies and procedures and not in a way that mitigates error findings or modifies findings in order to hide or offset household circumstances from the QC case file to reduce or eliminate variances. In order to ensure consistent results, second party reviews must be performed on all types of cases, with an emphasis on the accuracy of the findings and not to ameliorate payment errors found during the reviews.

Documentation of second party reviews must be performed any time substantive changes are made to a case file. Substantive changes are changes that would impact either the eligibility determination or allotment determination, including but not limited to: mathematical/budget calculations, policy application, or variance identification/analysis that have an impact on the disposition and/or finding of the case. Such documentation ensures the integrity of review findings and aids in the effective administration of the QC system by identifying and tracking possible training needs or areas needing policy clarification/training. Other corrections, such as for grammar, to the case records in second party reviews need not be documented in the files transmitted to FNS.

State Quality Control Requests for Policy Interpretations

FNS guidance allows for the SQCR to ask for policy clarification from the State's policy unit if the SQCR is unsure of the correct certification policy. However, the SQCR must limit the scope of the clarification request to the circumstances necessary to understand the policy applied to the specific case. The clarification request may not include the case number, client's names, or details about variances discovered in the case. The SQCR may not discuss their case findings with an eligibility worker, policy official, or a third party in a manner that can be construed as attempting to mitigate an error case finding. This means that the SQCR's communication with such persons must be limited to only a clarification of the policy involved in the specific case. The SQCR should not discuss how the policy clarification can alter the findings of the case nor indicate how the policy clarification can be used to resolve an apparent error in the case being reviewed.

Federal regulations at 275.12(e) require that QC reviews transmitted to FNS include the documentation of any information used to substantiate a decision. As indicated above, any communication between the SQCR and the eligibility worker, certification policy team or a third party regarding a policy clarification request must be fully documented in the QC case file and included in the case file submitted to FNS if the case is selected for Federal re-review. Documentation must include the contact name and position, date of contact, description of the issue needing to be clarified and final results of clarification, including information that was changed that is to be submitted to FNS. The documentation must be input into the appropriate element on the FNS-380. This clarification is in regards to specific policy inquiries that are made on a case-by-case basis by the SQCR to a policy unit or other position external to QC, and is not intended to cover blanket policy guidance to an entire QC division or other, similar, mass-issued clarifications.

Federal Access to State SNAP Eligibility and Quality Control Systems

FNS Quality Control Memorandum 16-02 clarified that States may not restrict Federal reviewer access to State systems, certification files, or any information collected to determine the eligibility of a participant, or information maintained within the State SNAP quality control system that would be responsive to the reporting requirements in sections 16(c)(4) and (5) of the Food and Nutrition Act of 2008, as amended, and regulations at 7 CFR 275.21. Some States may require time to create new read-only user roles to limit access to SNAP information only. FNS is committed to this requirement; however, we do understand that there are State resource constraints. FNS seeks to work collaboratively with States to implement Federal access to State systems in a reasonable manner that minimizes the impact on State SNAP operations. States should negotiate a date with their Regional Office to provide Federal access to such systems and information. Compliance with this requirement will be reviewed during the State's next Management Evaluation.

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FNS appreciates the continuing State commitment strengthen the integrity of the SNAP QC process and is committed to fully answering State questions in order to clarify policy. If you have any questions regarding the policies enclosed with this memorandum, please contact Stephanie Proska, Quality Control Branch Chief, at Stephanie.Proska@fns.usda.gov.

Sincerely,

/s/ Stephanie Proska for

Ronald K. Ward
Director
Program Accountability and Administration Division
Supplemental Nutrition Assistance Program