

Department of Public Health
and Human Services

Section:
CASE MANAGEMENT

SUPPLEMENTAL NUTRITION ASSISTANCE
PROGRAM (SNAP)

Subject:
Program Compliance Reviews

Supersedes: FS 1508-2 (10/01/09); Bulletin 87 (10/26/11)

References: 7 CFR 275.12(g); 7 CFR 273.2(d); 7 CFR 273.8(h)

GENERAL RULE -- Program Compliance (PC) reviews are conducted using a statistical sampling of cases. The reviews provide:

1. A systematic method of measuring the validity of the SNAP caseload;
2. A basis for determining error rates;
3. Information to base corrective action plans at all levels of administration; and,
4. A basis for establishing the State Agency's eligibility for high performance bonus money.

SHARED GOALS

The SNAP Unit and the Program Compliance Unit share the common goal of improving the payment accuracy of SNAP cases by:

1. Making every reasonable effort that each case selected for review is eligible and receiving the correct allotment; and,
2. Maintaining the integrity of Program Compliance rules and regulations.

FAILURE/REFUSAL TO COOPERATE

When an individual does not cooperate with a Program Compliance review, the Program Compliance Auditor (PCA) sends a disqualification letter to the County Director stating the household has not cooperated with the review. The OPA Case Manager must close the SNAP case with timely notice of adverse action. The household is disqualified even if the case closed for a different reason prior to receiving the disqualification letter. It must be documented in case notes that the individual and any household he/she is a part of is not eligible to receive SNAP benefits until he/she cooperates with the Program Compliance case review or the household reapplies for SNAP benefits **125 days** after the end of the annual QC review period (SNAP 104-1). The OPA Case Manager must set program and person alerts to help identify the disqualification. If a household reapplies for benefits during the disqualification period, the OPA Case Manager must verify with Program Compliance that the individual has cooperated with Program Compliance before SNAP benefits can be issued (SNAP 104-1).

NOTE: If a household does not cooperate with a Program Compliance review for SNAP and the case is open on TANF and/or Medicaid, the OPA Case Manager should refer to the program policy manual for the policy for each program.

SENDING CASE FILES WITHIN THREE DAYS

The OPA sends the case file to the Program Compliance Auditor within three calendar days after being notified (phone, e-mail, or letter) the case was selected for review. The PCA returns the case file to the OPA within three calendar days of receipt.

PROGRAM COMPLIANCE REVIEWS

The Program Compliance Auditor reviews information gathered from all sources (e.g., case file, TEAMS, collateral contacts, etc.) and determines whether SNAP eligibility is determined correctly.

The PCA contacts the OPA, if needed, to:

1. Notify the OPA if the case was dropped due to inability to locate;
2. Communicate information discovered relevant to any assistance program that could affect eligibility and benefit amount;

NOTE: Contact will be made promptly if the information could cause a continuing error.

3. Provide feedback to allow for the correction of the errors if one error offsets another error resulting in a no dollar error; and,
4. Work cooperatively with all parties involved in review process.

NOTE: The Regional Policy Specialist (RPS) may be consulted by the OPA (following OPA protocol) or the PC Lead Worker.

The PCA submits the findings and the PC review file to the PC Lead Worker within 45 calendar days after the case was assigned for review. The PC Lead Worker determines if the findings of the review are correct.

NOTE: The time frames given are guidelines. Federal regulations require PC to transmit the case to the Food and Nutrition Service (FNS) within **115 calendar days** after the month the case was selected for review. Case files are forwarded to the next step in this process as soon as possible. Some of the steps may take longer than indicated.



**FINALIZED
CORRECT CASES**

When the case is determined to be correct, the findings are finalized. A *smiley face* ☺ is sent to the OPA and/or the RPS.

**ERROR
RESOLUTION
PROCESS**

The PCA contacts the PC Lead Worker to discuss the case circumstances in order to find the case correct. If they cannot find the case correct, the PC Lead Worker sends the error findings to the SNAP Policy Specialist. The SNAP Policy Specialist will email a response to PC Lead worker within seven days as to whether or not the Public Assistance Bureau staff concurs with the PC review findings.

The SNAP Policy Specialist attempts to resolve any discrepancies in the findings prior to the error findings being forwarded to the OPA Case Manager, Supervisor, County Director, and Regional Policy Specialist for their review. If the Public Assistance Bureau (PAB) staff agrees with the findings, the SNAP Policy Specialist contacts the PC Lead Worker and the findings are finalized.

If PAB staff does not agree with the error, the SNAP Policy Specialist will contact the PC Lead Worker to discuss the issues. If additional information is needed, PCA will be responsible to obtain the information. The findings are finalized depending on the receipt of the additional information.

If the SNAP Policy Specialist and PC Lead Worker cannot resolve the issue(s) with the findings, the SNAP Unit Program Manager and PC Program Manager review the case with staff. If the issues regarding the findings still cannot be resolved, the PC Lead Worker will seek clarification from Regional FNS QC staff. The findings are finalized depending on the receipt of the clarification.

When PC error findings are finalized, they are forwarded electronically to a SNAP Unit designee to distribute to OPA Management, OPA Case Manager who made the error, SNAP Policy Specialist, RPSs, Quality Assurance Reviewers, and trainers.

**RESOLVING
ISSUES**

There may be times when the Program Compliance Auditor has verification/information that is not in the case file. This verification/information may need to be faxed to the SNAP Policy Specialist and OPA for discussion purposes. The decision whether or not to fax the verification to the OPA is made by the PC Lead Worker and the SNAP Policy Specialist.

When a PC procedural issue and/or program policy issue arises that requires FNS guidance, it is the responsibility of the PC Lead Worker to obtain clarification from FNS. It is the SNAP Policy Specialist's responsibility to obtain clarification from FNS regarding policy issues. The

PC Lead Worker and the SNAP Policy Specialist decide who will request clarification from FNS for joint issues.

**TRACKING PC
REVIEWS**

SNAP Unit designees:

1. Track causes of errors for training purposes;
2. Meet and consult with Regional Policy Specialists and Central Office Policy Specialists as needed to share data and improve payment accuracy; and,
3. Review accuracy and timeliness of reviews resulting in over payments.

Quality Assurance Specialists complete a TEAMS review of the error cases 90 calendar days after the error was finalized to assure the accuracy of the case.

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