



Food and
Nutrition
Service

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DATE: September 2, 2022

SUBJECT: Supplemental Nutrition Assistance Program (SNAP) Quality Control Policy Memo: 22-04 Clarifying use of certain coding on the FNS 380-1, The QC Review Schedule, and the End of the Annual Review Period

TO: All SNAP States
All Regions

SNAP's Quality Control (QC) system is an integral component of the Food and Nutrition Service's (FNS) mission to provide nutrition assistance to those in need and inspire public confidence through strong stewardship of public funds. As such, it is crucial the data collected on the FNS 380-1, the *Quality Control Review Schedule* (OMB 0584-0299), accurately reflects household circumstances, case errors, and characteristics of persons sampled for QC since SNAP uses this information to analyze participation and error trends for program improvement. In the fall of 2021, FNS, while conducting research on another project, assessed the data collected on the FNS 380-1 and identified three areas, outlined in this memo, of discrepancies and missing information which required clarifications and improvement of coding field instructions. This memorandum clarifies existing policy to ensure the data collected through SNAP's QC system produces reliable program information.

Local Agency Codes

On the FNS 380-1, FNS has historically identified the local area office with use of a local area code, or LAC. This code is intended to allow SNAP administrators to identify administrative locations where actions to improve Program accuracy are warranted. However, with the advancement of technology and new business processes like case banking and call centers, which provide the ability for public services to be administered virtually, FNS identified that LACs are not being identified consistently by States to ensure this.

States must assign each SNAP local office and any call center unit with the ability to make eligibility determinations or redeterminations a unique LAC to fill in Item 4 of the FNS 380-1.

For coding on the FNS 380-1, the three-digit numeric LAC for item 4 must represent the SNAP local office or call center unit that finalized the most recent certification action.

Per existing instructions on the OMB approved form, States must submit to their respective FNS regional office a listing of corresponding codes for the LAC field. Please provide the updated list no later than October 1, 2022, to ensure FNS has an updated list for the Federal fiscal year (FFY) 2023 review period. Future updates to LACs must be submitted to the State's appropriate FNS regional office prior to implementation.

Section 7 of the FNS 380-1

Section 7, items 1 through 4 of the FNS 380-1, is available to the State agency to code additional information. Each item can accommodate up to twenty-two alpha-numeric characters. FNS encourages States use these codes to collect additional details for data analysis of QC cases.

For example, item number 14 "Cause" requests a code to identify the primary cause of a variance. Code 99 "Other" is used when no other code fits, however, for useful data analysis more information is needed. FNS learned a best practice in some States is to use Section 7 to further explain the error causes they are defining as 'other' in item 14. This practice assists in identifying corrective action needed for circumstances that fall under "Other" in item 14. Of course, coding error causes is not the only way to use Section 7. Additional examples for the use of Section 7 include identification of specific corrective action needed for a case, identification of a specific demonstration project or waiver relevant to the case, or to code a relevant SNAP option that contributed to the case's variances.

FNS encourages States to develop coding in Section 7 that will assist with addressing corrective action for SNAP. Specifically, FNS encourages States to use Section 7 to further explain the use of "99 - Other" under item 14 for assisting in the development of appropriate corrective actions. FNS requests the coding updates used in Section 7 to further explain the selection of "99 – Other" be submitted to FNS to assist in improving coding options in future iterations of the FNS 380-1.

The End of the Annual Review Period and Completing Incomplete Cases

In researching the coding issues FNS learned that States were confused about the deadlines for completing cases already determined as incomplete. Not knowing what the final date is to complete cases creates inequities among States for submitting QC data on time and therefore clarification of this deadline is important.

All SNAP States

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The QC review year coincides with a FFY, which begins October 1 and ends September 30 of the following calendar year. Therefore, the end of the annual QC review period is 115 days after September 30, which is typically January 23. If January 23 falls on the weekend or the Federal government is closed that day, the annual review period for that year would officially end the next business day.

QC cases originally disposed of as incomplete cannot be completed after the end of the annual review period. This deadline for all project areas helps ensure the integrity and fairness of submitting QC data, including completion rate data.

We hope these clarifications help improve the accuracy and usefulness of data on the FNS 380-1 and better explain the timeframes States have to complete QC cases. If you have any questions regarding the clarifications in this memorandum, please contact John McCleskey, Quality Control Branch Chief.



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