



# SNAP: Keys to Payment Accuracy

## A guide for State agencies

March 2024

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# SNAP: Keys to Payment Accuracy

Payment accuracy in the Supplemental Nutrition Assistance Program (SNAP) is a priority for USDA's Food and Nutrition Service (FNS). Accurate payments reflect better service to SNAP clients and help maintain program integrity and external support for SNAP. Payment accuracy relies on (1) making accurate eligibility determinations and benefit calculations and (2) finding and correcting errors in eligibility determinations and benefit calculations.

***Everyone, from eligibility workers to State agency leaders, has a role in maintaining and improving SNAP payment accuracy.***

This document provides guidance on the most important strategies or "Keys" to improving and maintaining payment accuracy. It is a companion to the Keys to Application Processing Timeliness guide. (Links to this document and the resources mentioned in this guide are in the [appendix](#).)

# The Keys to Payment Accuracy



A [Root Cause Analysis](#) uses data to reveal how and why errors happen, an important first step to developing effective strategies to minimize errors.



[Quality Assurance Reviews](#) are tools to prevent or correct errors and provide real-time, on-the-job training on payment accuracy for eligibility workers.



[Policy Options and Waivers](#) help determine how State Agencies administer SNAP and resulting changes can impact payment accuracy.



[Training](#) staff reinforces existing policies, procedures, and best practices. It is also critical for systematically conveying policy changes and new insights on improving or maintaining payment accuracy to all eligibility workers.



[Staffing and Workload Management](#) practices help determine whether staff have the time, skills, and knowledge they need to accurately determine eligibility and calculate benefits.



The [Organizational Culture](#) of a State agency influences the actions and performance of staff and can affect outcomes, including payment accuracy.



[Data Systems and Technology](#) support payment accuracy by correctly applying policy when making determinations and calculating benefits, by supporting effective staff work processes and by helping clients provide complete and accurate information.



[Corrective Action Plans \(CAPs\)](#) are a Federal requirement when State agencies have a high payment error rate and are an essential tool for developing systematic approaches for investigating and addressing the root causes of errors.



[Appendix](#) of all resources mentioned, including links.



# Root Cause Analysis

## Key takeaways

- State agencies can conduct root cause analysis using a combination of prespecified, “canned reports” in the SNAP QC System and analysis in Microsoft Excel to find the causes of widespread errors or the largest dollar errors.
- Understanding root causes of errors can help State agencies consider approaches for addressing errors.

## Description

Root cause analysis helps State agencies understand why errors happened, when they happened, and who caused them. Armed with this knowledge, leaders can make data-informed decisions to improve payment accuracy. FNS recommends State agencies conduct root cause analyses regularly to keep improving payment accuracy. Root cause analyses are also part of corrective action plans (CAPs). More information on CAPs is available in the [Corrective Action Plans Key](#).

## How to use this key

State agencies begin in FNS’s web-based SNAP Quality Control System (QCS) interface. SNAP QCS contains comprehensive SNAP QC data and is the best source of objective information on errors. State agencies can use the system’s prespecified reports, commonly known as “canned reports.” Canned reports break errors down by their characteristics, such as:

- What part of the case contained the error
- Cause of the error (agency or client)
- At what point in the case processing the error was made
- Local agency code

Canned reports can also tabulate the error elements with the largest dollars in variance. Links to the SNAP Quality Control home page and SNAP QC Data site are in the [appendix](#).

## Conducting the analysis

State agencies can find patterns when they analyze the results of canned reports—for example, the same kind of error may happen often in the same worker unit, or there may be a recurring group of errors relating to a given data element such as income. State agencies

### State agency example

One State agency starts by reviewing monthly QC data to find the types of payment errors associated with the highest dollar amounts. The State agency reviews cases with those errors to learn how they happened and thinks about how to address its cause—for example, by clarifying policies, providing updated training, or sending workers a simple reminder email.



## Root Cause Analysis

can then use these patterns to choose cases to analyze in Excel or a similar program. Staff can use the SNAP Mission Data Platform Ad Hoc Query Tool to select the variables and cases to export to Excel (such as selecting cases by QC error code).

By doing this analysis in Excel, staff can explore error patterns in detail. Comparing the characteristics of cases with a particular type of error with the characteristics of the overall caseload can highlight what is different about the cases with errors, which helps staff uncover the errors' root causes. Staff can also compare error patterns over time to see whether certain errors have become more or less common or learn how the characteristics of cases with a particular error have changed.

Armed with findings from their analysis of QC data, State agencies can focus in on the root causes of errors. To arrive at sound conclusions, they should consider the following additional strategies:

- **Develop process maps** to show how cases progress from application submission through determination, and which workers are responsible for each step in the process. Reviewing process maps with staff can uncover challenges and determine whether staff understand their responsibilities. Discussions aided by process maps may reveal, for example, that a dedicated team that receives, uploads, and reviews verification documents is not thoroughly reviewing received verifications because the team members think other workers are doing it.
- **Keep Asking "Why?"** can lead staff to discover the root causes of errors. For example, if an error resulted from a worker action, asking "Why?" can reveal whether the worker lacked the relevant policy knowledge, their supervisor provided incorrect guidance, or the worker failed to collect needed information during a client interview.
- **Consider the big picture** when reviewing analyses and results. For example, did broader factors affect how workers processed cases or how clients responded to requests for information? Examples may be State agency–related, such as recent policy changes workers are still adjusting to, or there may be factors like a natural disaster that affected some or all areas of the State. There may also be major changes in funding or agency oversight.
- **Ask a State or FNS Regional Office statistician or data systems staff** for help

### Process mapping

Process maps are visual depictions of steps in a process. They reflect policy requirements, the sequence and timing of steps, and the staff roles that complete each step. To develop process maps, State agencies can convene a small group of staff with detailed command of SNAP policy and eligibility procedures. This group can produce documents illustrating the proper procedures for handling the eligibility determination process.

### State agency example

Two State agencies use the results of root cause analysis to develop new training initiatives.

One State agency sanctioned for having a high payment error rate used a portion of their liability funds to hire training specialists. These specialists develop trainings and resources for eligibility workers focused on topics identified during root cause analysis and quality assurance reviews.

Another State agency identifies common errors, such as those related to information gathered during the application process and failure to appropriately document household circumstances to support a case decision. To address these errors, the State agency develops required trainings for eligibility workers focusing on topics like interviewing skills and appropriate documentation.

## Root Cause Analysis

with the analysis, if needed. FNS Regional Office staff are available to help State agencies understand their data and identify trends and areas of concern.

### How to use the results

The results from root cause analyses can support State agencies' efforts to improve payment accuracy, including by informing their use of the remaining keys in this guide. For example, by revealing the types of cases most commonly experiencing certain errors, the results can help State agencies select cases for quality assurance reviews and can inform staff training content. State agencies also use root cause analysis results when selecting methods to reduce errors when developing CAPs. More information is available in the [Quality Assurance Reviews Key](#), the [Training Key](#), and the [Corrective Action Plans Key](#), respectively.



# Quality Assurance Reviews

## Key takeaways

- Quality assurance reviews, especially additional reviews of eligibility worker determinations and targeted case reviews, can improve payment accuracy.
- State agencies can use the results of root cause analyses to focus quality assurance reviews on error-prone cases.

## Description

To check payment accuracy, State agencies conduct quality assurance (QA) reviews, in which experienced staff who did not process the case examine the case information to identify whether workers and the eligibility system processed cases correctly.

This key focuses on two types of QA reviews: (1) additional reviews of eligibility worker determinations and (2) targeted reviews. These are both desk reviews with no client contact and are not part of the official QC process.

### Additional reviews of eligibility worker determinations

State agencies can conduct additional reviews of cases selected from all eligibility workers. The frequency of reviews may vary by staff tenure. For example, supervisors may review all of a new worker's cases in their first few weeks and scale reviews back as workers gain experience. Supervisors may continue reviewing some cases for the first six to 12 months of workers' tenure. For veteran workers, reviewers may examine a few cases each month to check adherence to policy and procedures.

### Targeted case reviews

Targeted case reviews focus on error-prone cases or elements of cases. Reviews that focus on specific elements can be faster than full case reviews, enabling staff to review many cases while prioritizing the areas most likely to improve payment accuracy.

### How to use this key

QA reviews check whether case information is accurate and complete, and whether workers and the eligibility system correctly apply policy when they process cases. The following tips can help State agencies conduct effective QA reviews:

### Considering QC when selecting cases for QA review

Cases selected for QC review cannot be selected for QA review or any other actions that could interfere with the QC process until the results have been transmitted to FNS. FNS policy requires State agencies to take precautions against introducing bias into the QC review process:

- Once QC staff select the QC sample, local office or other agency workers must not review selected cases or make changes to eligibility or benefits to correct payment errors until the QC review is complete.
- Staff may conduct routine case actions, such as processing reported changes.
- After the QC review is complete, the State agency must not take corrective actions on the case until it has transmitted the QC results to FNS.

For more information, States can refer to sections 154.3, 154.7 and 154.8 of the FNS Handbook 310: SNAP QC Review Handbook. A link to this handbook is available in the [appendix](#).

## Quality Assurance Reviews

- **Choose a focus.** State agencies can use findings from a root cause analysis to choose elements of cases or entire cases for targeted reviews. For example, if root cause analysis reveals that many of the errors in a region relate to earned income, reviewers can check that element in all cases in the region shortly before or immediately after case processing. See the [Root Cause Analysis Key](#) for more information on identifying and understanding the underlying causes of errors.
- **Identify tools.** Reviewers can use tools, such as a review spreadsheet and case review sheet, to conduct reviews and document findings consistently.
- **Implement system enhancements.** State agencies can add system enhancements to assist in identifying cases for review, such as a pre-certification review tool that identifies cases with certain risk factors. Supervisors can review these cases and identify errors before certification by the eligibility worker.
- **Use the information.** QA case reviewers can use the results to give workers feedback, help supervisors identify high quality work, and support training and professional development in response to an error. Reviews can also uncover common errors that require a broader response, such as conducting refresher training or changing office procedures. To be effective, State agencies should develop a process for notifying leadership about the results. Administrators can check whether the policies are clearly written, whether data systems apply policy properly, and whether office processes align with policy.





# Policy Options and Waivers

## Key takeaways

- Some policy options and waivers may improve payment accuracy while achieving other program goals.
- Others may make it harder to ensure payment accuracy. State agencies can mitigate risks by carefully planning how to implement an option or waiver.

## Description

State agencies administer SNAP based on requirements in the Food and Nutrition Act of 2008 (available in the [appendix](#)). Federal regulations, policy options, and waivers give State agencies the flexibility to structure their program to better serve clients, streamline field operations, or coordinate eligibility activities with other programs. **Policy options** generally do not require FNS approval, however many policy options do need to be indicated to FNS in the State Plan of Operations at the beginning of each fiscal year. **Waivers** allow State agencies to temporarily waive certain Federal requirements for program operations, and they do require FNS approval.

Some policy options and waivers can support payment accuracy:

- **Waiver permitting State agencies to send electronic notices.** Allowing clients to choose to receive notices through a web portal instead of by mail gives the agency another tool for reaching clients, potentially improving response rates to requests for client action or information.
- **Simplified reporting.** If participants do not have to report changes in their circumstances as often, there are fewer opportunities for participants to underreport information or for State agencies to record and act on changes incorrectly.



Other policy options and waivers may pose challenges for payment accuracy:

- **Reducing interview frequency.** State agencies can adjust the frequency of recertification interviews within bounds set by SNAP regulations and household type. However, reducing interview frequency may streamline recertification processing, but also may make State agencies less likely to learn about changes in participants' circumstances that may affect their eligibility or benefit determination.
- **Verification rules for household expenses.** Subject to SNAP regulations, State agencies have the flexibility to decide the circumstances in which staff will verify certain household expenses, such as utility and shelter costs. If an agency chooses not to verify certain expenses except when questionable, it can streamline case processing, but there is a potential cost to payment accuracy.

### How to use this key

State agencies can take steps to mitigate and monitor the effects that options and waivers have on payment accuracy:

- **Conduct effective interviews.** For several commonly used policy options, effective interview techniques help State agencies collect accurate information on household circumstances including income, which is a common cause of payment errors.
- **Issue clear client instructions.** Clear instructions on initial and recertification applications that avoid policy jargon and use short, readable sentences make it more likely that agencies will receive complete and accurate information from clients.
- **Monitor performance.** During root cause analysis, State agencies can examine cases affected by options and waivers—such as cases with waived recertification interviews or those with expenses not subject to verification. If errors are higher in affected cases, they can adjust procedures or remove the option or waiver. For example, agencies can change the circumstances in which staff must verify expenses. See the [Root Cause Analysis Key](#) for more information.

### Resources on available policy options and waivers

Several FNS resources offer additional information on policy options and waivers:

- **SNAP Workload Management Matrix.** Includes information on available policy options, waivers, and demonstration projects.
- **SNAP Interview Toolkit.** Includes policy options for conducting interviews—such as conducting telephone and face-to-face interviews and obtaining telephonic and gestured signatures during an interview—and for obtaining waivers, such as on-demand interview waivers and waiving recertification interviews for clients who are elderly or have a disability and have no earned income.
- **State Options Report.** Includes information on current options State agencies have chosen to implement.
- **SNAP Waiver Database.** Includes current certification and State administration waivers.

Links to each of these resources are in the [appendix](#).



## Key takeaways

- Trainings on correctly processing cases and determining benefits are essential for maintaining payment accuracy.
- State agencies can use a mix of regular and ad hoc training through different formats to meet a range of training needs.

## Description

Regular trainings reinforce how staff can achieve high accuracy; update staff on new policies and procedures; and provide consistent answers to staff questions. The following training topics have helped some State agencies improve payment accuracy.

- **What is payment accuracy?** This training gives an overview of payment accuracy, what is included in a QC review, and staff responsibilities for payment accuracy. During training, State agencies can share resources available to staff, such as internal websites where workers can submit questions and learn about policies.
- **Conducting effective interviews.** Trainings on effective interviews focus on how to conduct thorough interviews and obtain all the information needed to make accurate determinations. The training can also include techniques appropriate for different interview methods, such as in person or telephone, and incorporate videos demonstrating strong interview techniques. The SNAP Interview Toolkit includes important information on how to conduct effective interviews. A link to this toolkit is in the [appendix](#).
- **Error-specific trainings.** Because there are a wide range of errors, error-specific trainings should focus on the kinds of errors—such as errors on earned income, household composition, and shelter deductions—occurring in the State or local agency being trained. Sessions can include case examples, mock interviews, and interactive games that focus on improving payment accuracy. State agencies can follow trainings with tips on how to use the information received during trainings, ad hoc trainings on focused topics, and monthly emails to staff on topics related to payment accuracy, such as the status of certain types of errors.

### Focus on the client

Clients, like staff, also need to be equipped with the information and tools to improve payment accuracy. State agencies can improve the quality of information they receive from clients by simply and directly communicating client responsibilities. This includes:

- Using communication methods that clients use the most, such as **text messaging and mobile applications**.
- **Updating notices and other client communications** to make them clear, concise, and easy to understand. FNS's model notice toolkit includes examples of plain language and formatting that State agencies can adapt to fit their own needs. A link to this toolkit is in the [appendix](#).
- **Using language that clients understand** in interviews so they can be clear on what is being discussed and what they are responsible for.
- For non-English speaking populations, **adhering to the bilingual requirements** at 7 CFR 272.4(b) to ensure clients fully understand program rules. A link to these requirements is in the [appendix](#).

### How to use this key

When State agencies develop and conduct training, they can improve training effectiveness in the following ways:

- **Conduct both regular and ad hoc trainings.** Regular training will help staff maintain their understanding of policies and procedures to apply when determining eligibility and benefits. State agencies can use ad hoc trainings to respond to errors related to a particular policy.
- **Vary training format.** Trainings can take different forms—interactive web-based training, short videos that workers can access online, or longer recorded webinars.
- **Assess and revise training approaches.** State agencies can conduct pre- and post-testing to see if staff understood and retained the training material, and use targeted case reviews for early feedback on the effectiveness of the training. If training focused on certain kinds of errors, and those errors are still showing up in case reviews, State agencies can consider clarifying the content or updating training methods. More information on conducting quality assurance reviews of cases is in the [Quality Assurance Reviews Key](#).
- **Draw on FNS Regional Office and other supports.** FNS Regional Offices can review State training materials and provide training resources. Other opportunities to learn new information to incorporate into trainings include conferences, State-to-State visits, and FNS Regional Office technical assistance and meetings.

#### Challenge: High staff turnover

High staff turnover has meant loss of knowledge and heightened demands to hire and train new staff. Engaging trainings and reference documents that focus on both foundational knowledge and the roles and responsibilities of workers can support new workers and provide the information they need to accurately process cases.





# Staffing and Workload Management

## Key takeaways

- Manageable workloads give staff enough time to complete tasks accurately.
- Specialization lets workers hone their skills for certain aspects of case processing and reviewing.
- Staff retention can increase accuracy by preserving institutional knowledge and expertise.

## Description

SNAP agencies have different ways of structuring their workflows, which can support or hinder staff in achieving high payment accuracy:

- **Traditional case management.** Workers maintain individual caseloads and handle most or all aspects of determining eligibility and benefits for their cases.
- **Task-based case processing (also called case banking).** Workers do not maintain a caseload but instead complete discrete tasks such as conducting interviews or reviewing verification documents. Workers draw tasks from queues based on their role and qualifications.
- **Hybrid case processing.** Workers maintain caseloads, but specialized units focus on certain functions, such as registering cases, processing changes, or receiving and uploading verifications. Some specialized units focus on certain types of cases, such as those eligible for other programs like assistance to the aged, blind, or disabled.

## How to use this key

Exhibit 1 outlines the advantages for payment accuracy of traditional case management and task-based case processing models. It also lists factors State agencies should consider to make their chosen model effective for payment accuracy. More information on staffing models is in the SNAP Workload Management Matrix, link available in the [appendix](#).

### Exhibit 1. Contrasting staffing models

Traditional case management	Task-based case processing
<b>Benefits for payment accuracy</b>	
<ul style="list-style-type: none"> <li>• May allow workers to develop familiarity with clients, which may increase accuracy.</li> <li>• May be easier to find errors with fewer workers touching each case.</li> </ul>	<ul style="list-style-type: none"> <li>• May be easier to distribute work evenly.</li> <li>• Supports staff specialization.</li> </ul>
<b>Considerations</b>	
<ul style="list-style-type: none"> <li>• Workers handle most or all aspects of case processing, so they must receive robust training and supervision to ensure they correctly apply policies and procedures to all aspects of case processes.</li> </ul>	<ul style="list-style-type: none"> <li>• Workers must be trained to correctly apply policies and procedures for the case processes they are responsible for.</li> <li>• State agencies should carefully track sources of errors, as many staff work on a single case.</li> </ul>

### Call centers

Staff in call centers can give customers program information, check on application or case status, answer questions, or document complaints. In some State agencies, call center staff complete eligibility interviews, certify households, and process changes. In others, unified virtual call centers are the core of their task-based staffing model and are complemented by local offices.

### Exhibit 2. Call center staffing model

#### Call centers

##### Benefits for payment accuracy

- Interactive Voice Response (IVR) systems can route calls and provide basic information, potentially increasing clients' understanding of program requirements.
- When IVRs route calls based on each caller's purpose, can allow staff to specialize in tasks such as conducting interviews, processing changes, or handling joint applications for multiple programs.
- May make it easier for clients to report changes in their circumstances, potentially improving payment accuracy.
- May allow non-merit personnel to perform certain allowable call center functions, freeing up eligibility workers to focus on eligibility functions.

##### Things to consider

- Call center data systems, processes, and staffing need to be able to manage heavy call volumes without long hold times.
- Thorough training on data systems, call center procedures, and SNAP policy are necessary so eligibility workers can effectively field client calls and process case actions.
- FNS approval may be required if a State agency is considering staffing non-merit personnel in call centers.

### Updating business processes

Examples of business processes that support client access and improve payment accuracy are:

- **On-demand interviews (waiver required).** Clients can call or walk in to complete an interview without scheduling it in advance. More information on waivers is available in the [Policy Options and Waivers Key](#).
- **Telephonic signature.** Clients can use their voice to sign their applications over the phone.
- **Lobby express counters.** Clients without an appointment can briefly meet with a caseworker and complete an action on a case, such as reporting a change or obtaining a new EBT card.



## Staffing and Workload Management

- **Mobile upload of verifications.** Clients can upload verifications using their phones or other devices.
- **Text communications.** Clients can quickly and easily report changes in their circumstances to an eligibility worker.
- **Check-in kiosks or computer stations.** Clients can check themselves in for their appointments and access other customer services in the agency lobby.

### Retaining staff

Staff turnover poses an ongoing threat to payment accuracy because it takes time for new workers to gain the knowledge and skills they need to process SNAP applications with consistently high accuracy. State agencies have found that reasonable workloads, pay raises, and bonuses can help them retain staff. Improving staff quality of life through flexible schedules; virtual or telework options; or office improvements like better lighting, ergonomic workstations, and soundproofed cubicle walls may also help agencies retain staff.

### Engaging community partners

State agencies can collaborate with external partners such as food banks to help clients complete applications and gather verifications. Such partnerships can improve payment accuracy by giving SNAP clients more ways to get help with their application and by training trusted and familiar community leaders to answer client questions about SNAP.



# Organizational Culture

## Key takeaways

- Senior leaders can foster an organizational culture that values payment accuracy.
- Senior leaders, local managers, and supervisors can (1) support performance goals that focus on payment accuracy, (2) emphasize the importance of payment accuracy in staff communications, and (3) recognize the success of staff and teams that achieve high or improved accuracy.

## Description

A healthy workplace culture encourages workers to stay motivated and committed to the agency and its priorities. At all levels—from eligibility workers to the State commissioner or secretary—the organizational culture can reinforce a commitment to accuracy and program integrity where:

- Staff are committed to excellence and understand how their role affects payment accuracy.
- Eligibility workers try to understand the causes of errors and work to minimize them.
- Agency staff educate clients to help them understand how important it is to provide accurate and complete information.

## How to use this key

Leaders can center payment accuracy in the State agency's work by:

**Underscoring why payment accuracy is important.** Accuracy supports responsible stewardship of public funds. It promotes fairness and equity by determining eligibility based on regulations and providing the proper level of benefits to participants. When clients receive accurate benefits, it protects them from underpayment and from needing to repay overpayments made in error.

**Setting standards and performance goals.** These highlight agency priorities and help staff understand how agency performance compares to expectations.

### **Demonstrating a personal commitment by visibly working toward improving accuracy.**

Senior agency leaders can regularly meet with staff on payment accuracy, stay knowledgeable on the causes of errors, and help develop the agency's strategy to improve accuracy. Local managers and supervisors can personally review cases for accuracy, support staff development in improving accuracy, and troubleshoot local causes of error.

### **Being open to new ideas, and support changes that may improve accuracy.**

Staff members who feel empowered to suggest changes can be a source of ideas for improving payment accuracy—and newer staff members may have a different and valuable perspective on barriers to payment accuracy.



## Organizational Culture

**Promoting staff engagement to boost employee buy-in to agency priorities.** Leaders can promote engagement by rewarding employee achievements or holding events to celebrate staff contributions. State agencies can assemble a working group that includes staff across various parts of program operations to participate in root cause analysis, which ensures the process benefits from diverse perspectives and promotes greater staff buy-in. States can involve staff from administration; policy; QC; fraud prevention; claims; data systems; and field operations, including local office administrators and eligibility workers.



## Key takeaways

- Careful data systems planning and testing, focusing on payment accuracy and aligning with business processes, helps ensure accurate eligibility and benefit determinations.
- When State agencies update their data systems, they should consider tools and functionality that improve payment accuracy.

## Description

Data systems support payment accuracy by correctly applying policy during determinations and calculating benefits, supporting effective staff work processes, and helping clients provide complete and accurate information. System functions that can improve payment accuracy by helping clients provide complete case information include:

- **Document imaging and management systems** provide access to electronic client documents. Some include **intelligent scanning** of predetermined document types, such as applications or notices, which allows the computer to read data fields on paper documents and enter them in the SNAP eligibility system.
- **Call center data systems** route calls, track wait times, and include text message or chat functions that can reduce wait times and dropped calls.
- **Callback assist for on-demand call centers** let clients hang up and remain on hold, which may lead more clients to complete application or recertification interviews.
- **Online applications and client portals** let clients submit applications, upload documents, and check their application status. Some portals let clients report changes and submit recertification information.
- **Mobile applications** give clients a convenient way to submit verification documents.
- **Text messages** alert clients of application or other deadlines and provide appointment reminders. Incorporating text messaging into a State agency's business processes may require

### State agency example

Two State agencies sanctioned for high payment error rates used a portion of their liability funds to make data systems enhancements to improve payment accuracy.

One State agency developed a quality check that identifies discrepancies during the certification process, such as inputs that seem unlikely during the initial application and after the eligibility worker completes the interview and verification data collection. The worker then reviews the results of the discrepancy checks and takes action, if warranted.

Another State agency updated their data system to identify up to 10 common areas where workers missed information during the certification process. The data system presents a message about the discrepancy that the worker must address before moving forward. The system creates a report of discrepancies that supervisors use to inform training and program oversight. When workers process changes in household circumstances, another data system enhancement cross-checks changes against related fields that should be completed. Examples include reviewing shelter deduction details when updating a household's address, confirming expenses that exceed household income, reviewing medical expenses when a household member reports having a disability, and updating income during recertification. The worker must complete the identified fields before moving forward.

## Data Systems and Technology

a waiver. More information on waivers is available in the available in the [Policy Options and Waivers Key](#).

### How to use this key

When planning, developing, and implementing new systems, or updating existing systems, State agencies should maintain a focus on payment accuracy that considers the following:

**Put program integrity first.** Payment accuracy, as well as timely processing of applications and recertifications, should be central from the earliest planning discussions. This means considering how data system functionality, worker training, and changes to business processes may help maintain or improve payment accuracy.

**Consider business processes.** State agencies should develop systems that support worker processes. Process maps can reveal whether new functionalities would encourage payment accuracy, such as reminders to conduct data matching to confirm household income. They can also help State agencies find places where systems changes can enable new processes to better support payment accuracy. More information on developing process maps is in the [Root Cause Analysis Key](#).

**Conduct requirements review and testing.** State agencies should ensure data systems accurately apply SNAP policy, and rigorously test any system enhancements before fielding them. State agencies can train eligibility workers to recognize whether data systems apply policy correctly and see what adjustments are needed. State agencies can consult FNS Handbook 901: The Advance Planning Document Process when planning for new technology. This handbook is designed to help State agencies understand FNS requirements to secure approval and funding for modernizing eligibility systems and EBT benefit delivery services. (A link to the handbook is in the [appendix](#).)





# Corrective Action Plans

## Key takeaways

- Realistic corrective action plans (CAPs) give staff enough time to address the root causes of errors and evaluate the effectiveness of their corrective actions.
- Effective CAPs draw on the perspectives of experienced and new staff in various roles who work together on the CAP.
- Monitoring and evaluating CAPs can help State agencies understand if the corrective action has addressed the error.

## Description

State agencies use corrective action plans (CAPs) to develop systematic approaches to address the root causes of errors and assess the effectiveness of corrective actions. Strong CAPs can help State agencies maintain and improve payment accuracy. The process takes time and commitment from leaders and staff.

### When a CAP is required

Federal regulations at 7 CFR 275.16(b)<sup>1</sup> require State agencies to develop corrective action plans to address deficiencies in payment accuracy in the following circumstances:

- If the payment error rate is 6 percent or greater.
- If 5 percent or more of a State agency's quality control caseload is coded as incomplete.

### How to use this key

State agencies can consider these tips for developing and implementing a successful CAP:

- **Engage in the process** of identifying issues, brainstorming solutions, and developing a CAP.

### CAP components

Thorough corrective action plans include the following components:

- **A description of the problem.** Describe what went wrong and why it went wrong. This includes both the error element and the root cause associated with the problem.
- **The magnitude of the problem.** How many cases were affected? What was the dollar value of the error? Does it affect the entire State? Just one county?
- **The data source(s) used** to identify the problem and its magnitude, such as QC, supervisory reviews, management evaluations, and observations.
- **A description of the corrective action initiative** developed to resolve the problem.
- **The tasks, time frames, and person(s) responsible** for implementing the corrective action.
- **A description of the plan to monitor** implementation of the corrective action.
- **A description of the plan to evaluate** the effectiveness of corrective action and if the expected outcome was achieved.
- **The name and title of the person** with overall responsibility for the CAP.

<sup>1</sup> A CAP is also required if errors are found in an FNS review, US Government Accountability Office audit, contract audit, USDA audit or investigation at the State agency or project area level, or an FNS report about the implementation of major system changes.

## Corrective Action Plans

Creating and updating a CAP isn't just a process of submitting the appropriate form; it is a way to resolve errors and thus maintain or improve payment accuracy.

- **Be realistic** about the number and scope of corrective action initiatives that can be done at once. Prioritize the changes likely to have the greatest impact.
- **Assign reasonable completion dates** for each step in the initiative, because solutions take time to implement and to produce results.
- **Establish clear lines of responsibility** for implementing each component of the CAP, so staff understand their roles and each component has an owner.
- **Develop monitoring and evaluation plans**, including a corrective action tracking report that documents actions and progress toward resolution. Evaluation plans will help State agencies assess the effectiveness of corrective actions in reducing the targeted errors. Effective evaluation plans include metrics and objective targets for success.

### Creating an effective CAP

There are five steps to developing an effective CAP:

1. **Create a collaborative team to produce the CAP.** The team should include the different perspectives of eligibility workers, supervisors, fraud prevention staff, claims staff, quality control staff, and the technical staff.
2. **Conduct a root cause analysis** to reveal the primary factors contributing to payment errors. See the [Root Cause Analysis Key](#) for more information. State agencies can also **conduct a risk assessment**. This entails reviewing each risk and determining the *frequency*, or how often this factor leads to errors, and the *impact*, which reveals how much potential under- or overissuance there is when this factor leads to an error. State agencies can use this information to consider corrective actions appropriate for the size and scope of identified errors.
3. **Draft the CAP** using the information gained from Step 2. This includes:
  - **Brainstorming ideas** for corrective actions with the collaborative team. Agencies should hold candid discussions about the merits and foreseeable challenges of all new or different ideas.
  - **Developing SMART initiatives** that are specific, measurable, achievable, realistic, and time-bound. That is, each should address the problem the CAP focuses on; be possible within the State agency's budget and resources; have outcomes that can be measured; and have a time frame for

### State agency example

One State agency organized its CAP by root causes and identified wages and salaries and household composition as error-prone areas. For each root cause, the State agency identified responsible staff, when and why errors occurred, the data sources analyzed to understand the error, and the magnitude of the issue (amount and percentage of dollars in error, and number and percentage of affected cases).

As part of their root cause analysis, the State agency determined whether the errors were caused by the agency or the client. They then noted actions needed to resolve the issue, such as refresher training for staff on earned income policy, calculation, and data entry; post-training quizzes; and review of notices to improve client understanding.

Finally, the State agency described how it would monitor the effectiveness of the corrective action, including assessing quiz scores to evaluate training effectiveness, monitoring error rates, and tracking updates to client notices. Each root cause issue included an implementation date and sections to document semiannual updates.

## Corrective Action Plans

implementation, completion, or measurement. State agencies should also describe how the chosen corrective actions relate to the root causes of errors.

**4. Implement corrective actions** such as changing policy or initiating training. State agencies should communicate changes to all affected staff, update policy and procedures manuals, and add trainings as needed, depending on the activities and scope of the corrective actions.

**5. Monitor corrective actions** and document outcomes to assess whether errors targeted by the CAP become less frequent after the changes. State agencies should revisit and adjust corrective actions to keep improving performance. Agencies update FNS semiannually on the status of active CAPs. If CAPs have remained active for a year or more, agencies may want to consider whether new actions may be more effective.

### CAP template

Exhibit 3 provides a sample CAP template. State agencies should include a different sheet for each corrective action. FNS issued guidance to State agencies in June 2023 on regulatory procedures for CAPs to ensure consistency and emphasis on improving SNAP payment accuracy (link in the [appendix](#).)



**Exhibit 3.** Sample CAP template

<b>SNAP CORRECTIVE ACTION PLAN (MODEL)</b>		
<p>Agency: _____ Date: _____</p> <p>Office(s) and/or Unit(s) implementing this plan:</p>  <p>Description of deficiency, including associated error element and root cause:</p>   <p>Magnitude and geographic extent of deficiency and data sources used:</p>   <p>Complete description of activity developed to resolve deficiency:</p>    		
<b>Tasks/steps, time frames and person(s) responsible for each task/step:</b>		
Description of Task/Step	Person Responsible	Target Completion Date

**Corrective Action Plans**

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

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

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

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

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



# Appendix

Resource	Link
<b>Companion documents</b>	
SNAP: Keys to Application Processing Timeliness	Include link when available
<b>Root Cause Analysis</b>	
SNAP Quality Control Overview and FAQ	<a href="https://www.fns.usda.gov/snap/quality-control">https://www.fns.usda.gov/snap/quality-control</a>
SNAP Quality Control Data	<a href="https://www.fns.usda.gov/snap/qc/database">https://www.fns.usda.gov/snap/qc/database</a>
<b>Quality Assurance Reviews</b>	
FNS Handbook 310: SNAP Quality Control Review Handbook	<a href="https://fns-prod.azureedge.us/sites/default/files/resource-files/QCPM23-01-page-changes.pdf">https://fns-prod.azureedge.us/sites/default/files/resource-files/QCPM23-01-page-changes.pdf</a>
<b>Policy Options and Waivers</b>	
The Food and Nutrition Act of 2008	<a href="https://www.govinfo.gov/app/details/COMPS-10331">https://www.govinfo.gov/app/details/COMPS-10331</a>
SNAP Workload Management Matrix	<a href="https://www.fns.usda.gov/snap/admin/workload-management-matrix">https://www.fns.usda.gov/snap/admin/workload-management-matrix</a>
SNAP Interview Toolkit	<a href="https://www.fns.usda.gov/snap/state-agency-interview-toolkit">https://www.fns.usda.gov/snap/state-agency-interview-toolkit</a>
State Options Report	<a href="https://www.fns.usda.gov/snap/waivers/state-options-report">https://www.fns.usda.gov/snap/waivers/state-options-report</a>
SNAP Waiver Database	<a href="https://www.fns.usda.gov/snap/waivers/rules">https://www.fns.usda.gov/snap/waivers/rules</a>
<b>Training</b>	
SNAP Model Notice Toolkit	<a href="https://www.fns.usda.gov/snap/model-notice-toolkit">https://www.fns.usda.gov/snap/model-notice-toolkit</a>
Bilingual requirements	<a href="https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-C/part-272/section-272.4">https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-C/part-272/section-272.4</a>
SNAP Interview Toolkit	<a href="https://www.fns.usda.gov/snap/state-agency-interview-toolkit">https://www.fns.usda.gov/snap/state-agency-interview-toolkit</a>
<b>Staffing and Workload Management</b>	
SNAP Workload Management Matrix	<a href="https://www.fns.usda.gov/snap/admin/workload-management-matrix">https://www.fns.usda.gov/snap/admin/workload-management-matrix</a>
<b>Data Systems and Technology</b>	
FNS Handbook 901: Advance Planning Document (APD) Handbook	<a href="https://www.fns.usda.gov/sso/fns-handbook-901-v2-advance-planning-documents">https://www.fns.usda.gov/sso/fns-handbook-901-v2-advance-planning-documents</a>
<b>Corrective Action Plans (CAPs)</b>	
SNAP Corrective Action Plan: Quality Control Review Reports, State Requirements June 2023	<a href="https://www.fns.usda.gov/snap/qc/caps/guide">https://www.fns.usda.gov/snap/qc/caps/guide</a>