



SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP)

STATE LEVEL PROGRAM ACCESS REVIEW GUIDE

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*USDA Food and Nutrition Service:
Maribelle Balbes, Western Region
Bonnie Brathwaite, Northeast Region
Alyssa Hayes, Mid-Atlantic Region
Mary Ann Marshall Valair, Northeast Region
Sabina Velasco, Mountain Plains Region
Gwen Warren, Southwest Region*

FOR FNS REGIONAL OFFICES (FNSROs)

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I. INTRODUCTION

Access to Supplemental Nutrition Assistance Program (SNAP) benefits by eligible applicants and ongoing participants is one of the highest priorities set by the Food and Nutrition Service (FNS). Improving program access helps to increase food security among low-income, eligible persons. FNS and State agencies (SA) work to improve program access in two ways: first, by informing people about the availability of food assistance through SNAP, and second, by identifying barriers that prevent eligible people from accessing Program benefits.

As SAs have modernized their SNAP operations, there has been an increase in the implementation and use of online applications, online State and community partner resources, and call centers/change centers. Subsequently, these technological changes and partnerships have had a significant impact on clients' experience with the Program. While the other review areas focus on specific program areas for which regulatory requirements exist, complete regulatory standards do not exist for the new methods especially with regard to call centers/change centers. Additionally, some States are county-administered and therefore may utilize multiple computer systems. Thus, it is important to review the impact of these new methods from the standpoint of customer service and other applicable program requirements. Since FNS is always looking to identify best practices and lessons learned in the area of SNAP modernization, the collection of information concerning the implementation of these initiatives will provide both a statewide and national benefit.

WHAT IS A STATE LEVEL PROGRAM ACCESS REVIEW?

A State Agency (SA) Program Access Review (PAR) is a Federal review conducted at the SA level (i.e., not a review of a local office). They are designed to examine and determine compliance with Federal SNAP requirements governing access to benefits by persons applying for or already participating in the Program. Except where local level site visits are required (Management Evaluation (ME) and Nutrition Education), reviews may be conducted either onsite or offsite, if data are available at the FNSRO to ensure an adequate review. When determining whether or not to perform an onsite review, consider changes that put the SA at risk for compliance problems such as recent staffing cuts, personnel changes, reduced budgets, policy changes, etc. It is likely that a combination of onsite and offsite review activities must be completed to conduct a SA PAR. Occasionally, it may be necessary to conduct a local office review in conjunction with the SA PAR due to the variety of structure that exists at the State level.

Although program access and civil rights requirements are closely related (i.e. bilingual requirements), this guide does not, for the most part, include civil rights review elements. Some FNSROs incorporate civil rights requirements into their SA PARs; other FNSROs conduct totally separate reviews, or conduct joint reviews simultaneously at the local agency using different FNSRO staff. FNSROs may continue their current practice with regard to SA PARs and Civil Rights Reviews.

II. STATE AGENCY PAR OBJECTIVES

This guidance provides information for FNSROs to monitor and examine efforts at the State agency level to ensure program access, improve customer service, and eliminate barriers to program participation. SA PARs are designed to:

- Determine compliance with Federal regulations at the State level;
- Identify barriers to program access at the State level;
- Provide technical assistance to State agencies to eliminate or minimize barriers;
- Promote a partnership with State agencies to further improve program access for SNAP applicants and participants; and
- Assess new modernization initiatives such as online applications and call centers.

III. PLANNING THE REVIEW

(Supplemental Information to be Used in Addition to the National ME Guidance)

A. PREPARATION

1. REVIEW NATIONAL ME GUIDANCE AND FOLLOW AS APPROPRIATE

2. SELECTING STATES

FNSROs should follow the National requirement(s). If resources permit, additional reviews should be conducted where known problems exist.

3. SELECTING THE REVIEW AREAS FOR EACH STATE

Generally all areas listed in this guide should be reviewed. There may be documented reasons why a particular area is not covered, such as ongoing technical assistance (TA) or SA corrective actions already in place.

4. PREPARING FOR THE REVIEW

Thorough preparation is critical to ensuring a successful PAR. The following preparatory steps should be taken prior to the review.

a. Review State-specific program policy and procedures:

- State profile
- Review last report for corrective actions and recommendations that need follow up
- SNAP certification policy waiver data base (available from FNS National Office [FNSNO] or the FNS website)
- FNS State Options Report
- Demonstration projects (available from FNSNO)
- State plans for Corrective Action Plan (CAP), outreach, and disqualifications
- State SNAP certification policy manual
- Program information available from State-level website and toll-free telephone numbers
- Civil Rights access-related policies, including limited English proficiency (LEP) and requirements
- Timeliness rates

b. Adapt questionnaires and other PAR materials if necessary to accommodate State-specific SNAP policy or procedures.

c. Provide formal review notification to the SA. Relevant information about the review, dates of the review, purpose of the review, and identification of the FNS review team should be communicated to the State in writing well in advance of the review. Other more specific information can be provided in a second letter, or communicated via conference call.

B. SPECIFIC REVIEW ELEMENTS

1. ADVOCATE CONCERNS

Purpose: To gather information from the advocate community identifying problems that reduce program access and customer service, or create barriers to program participation.

Scope: This includes all areas of customer service to potential program applicants and participants and any advocate organization that assists low income households (HHs) needing food assistance in the State.

Regulation Citations: 7 CFR 271.6

Suggested Review Methodology:

- Select an advocate to interview. Ask Public Affairs (PA) staff for assistance in finding an advocate group and contact person to fit the above criteria. If PA staff is unable to assist, ask the State SNAP Director, Regional Office Civil Rights Director or check local phone books, the Internet, legal aid agencies, food banks, immigration or civil rights agencies, or FNS field offices for advocates located in the State.
- Learn as much as you can about the group chosen prior to making the call so that you are familiar with what the group does.
- Contact the advocate via the telephone or email approximately four to six weeks prior to the SA review. Explain the following to the advocate representative:
 - 1.) You work for USDA/FNS and FNS' role in administering SNAP;
 - 2.) FNS works closely with its State partners to ensure the State agencies are administering the Program in accordance with the Act, Regulations, and the SA's plan of operation to minimize barriers to participation by eligible HHs;
 - 3.) You are conducting a review on program access and because of their involvement in SNAP operations we want the advocate group's input about how the State is doing with providing access to the SNAP; and
 - 4.) You will make note of all the advocate's concerns and forward them to the State SNAP director.
- Conduct the interview using the attached questionnaire. The questions can be sent to the advocate in advance of the telephone interview or e-mailed to the advocate.

2. LANGUAGE ACCESS SERVICES

Purpose: To determine State compliance with regulatory requirements and how service is provided to HHs with Limited English Proficiency (LEP).

Scope: State identification of bilingual needs and resources, and efforts to ensure that the needs of program participants and potential applicants are met.

Regulation Citations: 7 CFR 272.4(b)

Suggested Review Methodology:

- Send the State contact the questionnaire on translated materials and interpreter services. This questionnaire may not be needed if one was completed during past reviews, there were no compliance issues, and no changes have occurred. Using the Bilingual Materials and Translation Services Questionnaire, interview State staff to assess and evaluate the SA's efforts to identify, support, and monitor local offices that require bilingual services. This questionnaire can be sent to and returned by the State staff in advance of the onsite review.
- Translated Materials and Translation Services Regulations
- Translated Materials and Translation Services Questionnaire
- Translated Materials and Translation Services Checklist
- State written language access policies

3. CLIENT NOTICES

Purpose: To determine if the State policies, procedures, and regulations governing eligibility notices meet SNAP regulatory requirements, including the need to provide clients information in a clear and easily understood manner.

Scope: All State policies, procedures, and regulations in effect for eligibility notices that communicate information to SNAP participants. This includes an assessment of their content, design, and issuance timeframes.

Regulation Citations: 7 CFR 273.10(g)(1), 273.10(g)(1)(i), 273.10(g)(1)(ii), 273.10(g)(1)(iii), 273.14(b)(ii)(B), 273.14(b)(1)(iii), 273.2 (c)(2)(iii)(5), 273.(e)(3), and 273.2(i)(3)(iii).

Secondary Regulation Citation: Civil Rights Instruction 113-1 (<http://www.fns.usda.gov/cr/crregulation.htm>)

Suggested Review Methodology:

- Examine the statewide policies, procedures, and regulations governing both automated and manual notices. This review can be completed either onsite or as part of a desk review.
- Review statewide client notice policies, procedures, and regulations using the Client Notices Regulation Checklist.
- Review an actual client notice against Federal policy requirements.
- Review notice language for accuracy and clarity.
- As necessary, interview State staff.

4. CLIENT COMPLAINTS

Purpose: To assess the SA's system for analyzing complaints relevant to program access and customer service, determine if complaints are appropriately resolved timely, and if specifics exist.

Scope: All complaints received by the State or FNS for service to clients and applicants.

Regulation Citation: 7 CFR 271.6

Suggested Review Methodology:

- Request and review a copy of the State's analysis of complaints related to program access and customer service.
- Interview State staff using the complaint interview guide to determine how the State is complying with Federal regulations. This guide can be sent to and returned by State staff in advance of the interview.
- Determine success and timeliness of efforts to resolve any problems discovered.
- Optional: Pull a sample of 20 complaints from the State's complaints database. Follow up by contacting the client by phone to see if the complaint was resolved timely by the State.
- Optional: Include an analysis of complaints received in the FNSRO prior to going out on a review. Look at type of complaint and areas where the majority of complaints are coming from, etc. Compare actual documentation and client response to the response FNSRO received from the State.

5. FAIR HEARINGS

Purpose: To ensure eligible applicants and participants are notified of their right to a fair hearing (FH) and are provided an opportunity to request a timely review of their case by an independent official.

Scope: Includes examining States' policies and forms related to FHs to ensure they comply with regulatory requirements and reviewing decisions to determine consistency and correctness.

Regulation Citation: 7 CFR 273.15(c), 273.12(f)(3)(i)(A)

Suggested Review Methodology:

Complete a review of 20 upheld and reversed SNAP appeal decisions to determine whether the appeals were conducted in compliance with Federal regulations. Contact the State FH staff to discuss how the sample of 20 appeal decisions will be selected.

- Examine how the SA conducts FHs to ensure eligible applicants and recipients are not being denied program participation unnecessarily.
- Review the State's record on FHs upheld and reversed.
- Request a list of all appeal decisions for three months prior to the review.
- Review a sample of upheld and reversed decisions for consistency and correctness.
- Review the last report for corrective actions and recommendations that needed follow-up.
- Read the State's manual section on FHs in preparation for the review.

Fair Hearing Decision Reviews

Use worksheet for the sample listing.

Review the sample to determine:

- If the FH process is in accordance with Federal regulations.
- If FHs are being processed timely.
- If the hearing officials are making correct decisions.
- If FH decisions are being implemented in accordance with Federal regulations.
- If there are any trends.

To spot trends look to see:

- If there are many reversals for the same issue.
- If there is a particular policy that local offices or officials do not understand.
- If there is a certain official whose decisions are not correct or in accordance with Federal regulations.

6. CALL/CHANGE CENTERS

Purpose: To identify and review State oversight of SNAP certification functions (non-EBT) completed via telephone and assess the advantages or disadvantages of the current system from a SNAP regulatory and customer service perspective.

Scope: All services provided to applicants and program participants via a call or change center. This should include an assessment of compliance with program access requirements, including customer service provisions and SA oversight. This includes a review of any tracking tools or systems used to monitor the performance of the center's SNAP certification functions. See Review Tool #6.

Regulation Citation: N/A

FNS Policy Memos

- [Federal Support for Enrollment and Application Processing Costs – 1-22-2010](#)
- [Merit Staff Questions and Answers – 6-30-2010](#)
- Policy for Call Center Support Document – 6-28-2011 (via email)

Suggested Review Methodology:

- Determine if the State has a statewide call/change center or only a local call center or change center(s). Determine how many there are, where are they located, and what areas they cover.
- Determine how the phone number(s) is/are provided to SNAP applicants and recipients and whether the instructions for using the call/change center are adequate for the need. Determine how the clients are informed about the call/change center and the functions it performs. (Is the phone number on the approval notice or are they informed through some other way?)
- Perform the following tasks to determine client access via telephone:
 - Identify which certification functions may be completed via phone (e.g., initial application, recertification, change reporting) and who is responsible for processing the application or the change report;
 - Review the functions performed in the call/change center following the appropriate provisions of the Program Access Review Guide;
 - Determine if applicants are informed of their choice to contact the call/change center (or as appropriate, go online) in conducting their SNAP business;
 - Conduct a series of anonymous phone calls to a sample of call/change centers posing as applicants or clients in order to assess the adequacy of services provided and perform the following:
 - Measure overall performance;
 - Measure responsiveness at various times of the day or week;
 - Use (or adapt as needed) the review tools located in the addendum.
 - Listen in on live phone calls at a statewide or regional call/change center in order to assess the adequacy of service provided. If it is not possible to listen to live phone calls, listen to recorded phone calls provided by the call/change center. Use (or adapt as needed) the log sheet for call/change center reviews located in Review Tool #6;
 - Assess call/change center metrics to determine accessibility, including:
 - Number of calls received;
 - Percentage of calls answered by staff;
 - Percentage of calls abandoned;

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- Handling time (average, median, modes) – both recent and historical; and
 - Answer speeds (average, median, modes) – both recent and historical.
 - Determine if the call/change center is processing client-reported changes received via the call/change center accurately and timely. Include the following:
 - Off-site review of cases that had recent action taken by call/change center staff to ascertain:
 - The accuracy of the changes processed;
 - Documentation of the changes reported;
 - Assignments completed correctly; and
 - Impact of any mistakes discovered.
 - On-site monitoring of calls received to ascertain:
 - The responsiveness to client’s information; and
 - The accuracy of information provided in response to client questions.
 - Determine if the call/change center is processing client-reported changes received via documents imaged at the office accurately and timely, if applicable. Include the following:
 - Assessment of call/change center metrics to determine:
 - The percent of change related documents processed within 30 days; and
 - The time required to process change related documents (average, median, mode).
 - Off-site review of cases that had recent actions taken by the call/change center staff to ascertain:
 - The accuracy of the changes processed;
 - The documentation of the changes reported;
 - The assignments completed correctly; and
 - The impact of mistakes discovered.
 - Perform the following assessment of call/change center internal controls:
 - Assess the call center management structures by looking at:
 - Organization charts and work assignments;
 - Call/change center policies and procedures;
 - Metrics used to manage workload; and
 - Methods for receiving and routing calls.
 - Assess the call/change center monitoring process by determining:
 - Whether there is consistent monitoring performed by specialized staff;
 - Whether the worker/supervisor has the ability to listen to his/her calls so that call behaviors are clearly identified;
 - Whether there are guidelines used when monitoring calls, and whether these are regularly assessed for relevance and accuracy; and
 - Whether there is involvement from Operations and Training personnel to keep the call monitoring efforts relevant and in line with the needs of the operation.
 - Assess State Agency oversight:
 - Ask the SA to provide any available data or reports on how it (or the local office if it's a local call/change center) has monitored the center’s activity for the last three months regarding a) wait times, b) hold times, c) abandonment rate, d) quality of call agent customer service, e) number of inquiries resolved by the interactive voice response system (if any), and f) types/reasons for calls;
 - Document State standards for a, b, and c;
 - Determine if the SA has call/change center performance standards and measures. Such standards and measures may include:
 - Length of time for caller to get through to a live agent;
 - Percentage of calls dropped by the system;

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- Percentage of calls abandoned by the caller; and
 - Frequency with which the caller gets a busy signal or is told to call back later.
 - Review the system in place to measure standards for accuracy. Review performance standards data to determine if standards are being met. Ask the SA to provide any additional data or reports on other standards and measures regarding:
 - Quality of call agent customer service;
 - Number of inquiries resolved by the interactive voice response system (IVR), if any; and
 - Types/reasons for calls.
 - Review the classification of staff (merit or non-merit) in the call/change center and determine if the functions performed by call/change center staff are allowable. Determine if the State has received prior approval from FNS to allow any non-merit call/change center staff to perform any functions in the call/change center that involve client contact;
 - Review how the State determines adequate staffing levels, including any contingency plans in place to cover extra high volume days (such as Mondays, first days of the month, days after holiday weekends, days after major disasters or plant closings, etc.);
 - Check to see if the State has any results from call/change center client satisfaction/customer service surveys;
 - Review the appropriate participant complaint logs/files regarding issues with phone contacts.
 - Explore with the appropriate call/change center staff if there are an adequate number of lines to handle call volume and assess the potential for calls being dropped from the queues.
 - Review the training program resources provided to new staff.

7. APPLICATIONS & INTERNET RESOURCES

Purpose: To assess whether the State’s website, paper and online applications, and FNS-funded websites promote program access, comply with regulatory requirements and enable timely and appropriate processing of benefits for eligible applicants.

Scope: Examine all State applications and websites promoting program participation. This includes paper and Internet applications, pre-screener, online applications/forms/procedures, and informational websites.

Regulation Citation: 7 CFR 273.2(b)(i), 273.2(b)(ii), 273.2(b)(iii), 273.2(b)(iv), 273.2(b)(v), 273.2(b)(vi), 273.2(b)(vii), and 273.2(b)(viii).

FNS Policy Memos

- Conforming to Tri-Agency Guidance through Online Applications – 2-18-11
- Online Application Review Results and Action Items – 12-17-10
- SNAP - Household's Review of Information in Automated Systems- Revised 2-3-09
- Online Food Stamp Program Applications 10-16-06
- Online Food Stamp Application: Systems must allow for filing an incomplete application 12-16-04

Suggested Review Methodology:

- Examine the SA applications and website resources to assess whether they are user-friendly from a customer service point of view and to determine if sufficient program information is available to potential applicants.
 - Optional: Review SNAP Outreach cooperators’ online applications and website resources to determine ease of use and accuracy of information.
- Compare the electronic application to the Application Checklist for SNAP (see addendum) to ensure it contains all of the required elements and meets all requirements for online applications, including adherence to the Tri-Agency Guidance.
- Review all versions of the State’s paper application.
- Review the SA’s procedure manual and conduct staff interviews to determine whether procedures are established for online application processing.
- Ask the SA to submit available data that shows how the State monitors online applications submitted, the outcomes, timeliness, characteristics of applicants filing online, etc. If available, compare to similar data collected on paper applications.
- If applicable, it may be necessary to review the online resources of community partners who serve as SNAP outreach cooperators (i.e. sub recipients) receiving FNS funding through the State’s SNAP outreach plan.

8. TIMELINESS RATES

Purpose: To ensure that eligible applicants have access to benefits timely by identifying issues with and potential improvements to the State's timeliness rates.

Scope: Examining Federal 6-month and yearly application processing timeliness rates, State timeliness data for applications and recertifications (if collected), and timeliness CAP (if applicable).

Regulation Citation: 7 CFR 275.24(b)(4), 274.2(b), 273.2(g), 273.2(h), 273.2(i)(3), 273.14

Suggested Review Methodology:

- Determine if the State has an application processing timeliness problem by reviewing the Federal 6-month and yearly timeliness rates.
 - If the SA falls between 90 and 95 percent compliant with the timeliness standards, determine how the SA will address the issue.
 - If the SA falls below 90 percent compliant, the SA should develop a CAP. The CAP must remain until the upper bound reaches 95 percent.
 - If the SA already has a CAP in place for poor timeliness, review the progress made on the CAP.
- Compare the State-collected application processing timeliness data to the Federal data to determine if they are similar.
 - If the rates differ significantly, determine whether the State is measuring and defining timeliness correctly. For example, some States have defined a timely action as anything that does not surpass 60 days, but the statutory requirements require SAs to provide households with benefits by the 30th day.
- Review the State timeliness data for recertifications (if applicable).
- Determine whether the SA's timeliness rates are falling or improving over time.
- *Note: this section does not require the FNSRO to review individual cases for timeliness. The timeliness reviews are captured as part of the QC review process.*

IV. CONDUCTING THE REVIEW

The onsite review activities include the following:

Entrance Conference

When possible, entrance conferences should be conducted face-to-face. This provides an excellent opportunity to meet the people who will be working with the review team, explain why the review is being conducted, and answer any questions. Since this is not always practical, determine if and when it is more efficient to conduct a phone entrance conference prior to the start the review.

Interviews

Interviews of SNAP staff, community-based organizations/advocates, and clients are an important part of a review. These interviews provide the SA perspective of how they believe the Program is operating. The Review Tools section of the Addendum includes questionnaires that may be used to conduct interviews. While conducting interviews, the review team should be flexible and recognize the need to ask follow-up questions to clarify information or speak with additional staff to resolve inconsistencies as necessary.

Exit Conference

See National ME Guidance.

V. REPORTING REVIEW FINDINGS

A. PURPOSE OF THE REVIEW REPORT

The review report compiles findings, required corrective actions, observations, and suggestions into one report for the SA.

B. RECOMMENDED REPORT CONTENT

The report should include the following:

1. Introduction - provide basic information (who, what, where, when) about the review including:
 - Dates, times, and locations;
 - Description of review activities; and
 - An expression of appreciation for the assistance/hospitality shown to FNS reviewers.
2. Summary – briefly summarize the results of the review.
3. Review details – provide details on the review including:
 - Findings—describe deficiencies found citing specific regulatory requirements with which the SA is noncompliant;
 - Background – provide a complete explanation of each finding and all pertinent facts to support the findings, including specific information on case file records found in error;
 - Required Corrective Action – specify the action(s) that the SA must take to correct each finding; and
 - Suggestions – when corrective actions can improve the Program but are not required. Describe aspects of the SA operations that could be taken to promote program access and improve customer service.
 - Improvements, noteworthy initiatives, and best practices – include praise where appropriate.
4. SA Response – specify the date by which the SA must respond to all findings (no more than 60 days from the date of the report).

Detailed guidance on Management Evaluation reports can be found in the National Management Evaluation Guidance (August 2008, updated January 6, 2009).

VI. FOLLOW-UP

Depending on the extent of the review findings, follow-up may be easy or protracted. The SA must provide corrective action by the due date communicated in the review report cover letter. FNSROs are responsible for following up with the SA until an approved corrective action plan is received.

Once the State's CAP is received, review the CAP for adequacy. Ensure that all deficiencies are addressed and the corrective action is appropriate to the findings. If the State response is unclear or inadequate, contact the SA in writing and request additional information. When the corrective action is considered adequate, the review is considered closed.

VII. GLOSSARY OF ACRONYMS

CAP	Corrective Action Plan: Steps or actions taken by an operational organization (State or local agency) to change or improve operational effectiveness and provided in the format of a plan.
CR	Civil Rights
E&T	Employment & Training
EBT	Electronic Benefits Transfer
Finding:	Identification of non-compliance with program regulations, policies, and procedures (these issues require corrective action).
FH	Fair Hearing
FNS	Food and Nutrition Service
FNSNO	FNS National Office
FNSRO	FNS Regional Office
HH	Household
IEVS	Income and Eligibility Verification System
LEP	Limited English Proficiency
LIHEAP	Low Income Home Energy Assistance Program
ME	Management Evaluation
Noteworthy Initiatives:	Projects and practices worthy of recognition and sharing with other States for replication.
NPA	Non-Public Assistance
Observation	Identification of a weakness involving management practices or unregulated activity (associated with a suggestion).
PA	Public Assistance
PAR	Program Access Review
PA/SNAP	Public Assistance/Supplemental Nutrition Assistance Program
PRWORA	Personal Responsibility and Work Opportunity Reconciliation Act of 1996
QC	Quality Control
Required Corrective Action:	Action needed to bring operations into compliance with regulations, mandatory policies and procedures.
FNSRO	FNS Regional Office
SA	State Agency
SA/LA	State Agency/Local Agency
SNAP	Supplemental Nutrition Assistance Program
Suggestion	Statement of action that address observations in the report. These actions may or may not be required (associated with an observation).
TA	Technical Assistance: Guidance and support
USCIS	United States Citizenship and Immigration Services
USDA	United States Department of Agriculture

***Include any pertinent acronyms/terms relating to the SA and/or implementing agencies**

VIII. ADDENDUM

REVIEW TOOLS

1. ADVOCATE CONCERNS

Suggested Language for Scheduling Letter:

“Prior to the review week, the FNSRO will review the area of program access and barriers to participation by contacting a statewide anti-hunger advocate group to discuss program access issues. FNSRO Staff will discuss the advocate’s comments, concerns, and suggestions with the State SNAP Director.”

Regulations: 7 CFR

271.6 The Food and Nutrition Service shall conduct the review described in this section to determine whether a State agency is operating the Food Stamp Program and the Performance Reporting System in accordance with program requirements

Suggested Review Tools:

ADVOCATE INTERVIEW QUESTIONNAIRE

Organization:

Name/Title of Person Interviewed:

Address:

Phone:

Date of Interview:

FNSRO Reviewer:

Ask the advocate if they are interested in providing their opinions to FNS and if so, ask the following questions. If it is more convenient for the advocate, set up a future time and date to conduct the interview. The interview may be conducted via telephone or in person. The FNSRO cannot promise or even offer to an advocate that we will follow up on all their concerns. FNSROs can only help with whatever can really be addressed at this level, primarily access issues.

1. Are you aware of any barriers that exist which prevent potential clients from applying for SNAP benefits in your State or in a particular local office? (*e.g., are there procedures or actions taken by the State or a particular local office which discourage persons from seeking help through the SNAP?*) If the answer is yes, please obtain full explanation.
2. Are you aware of any informational activities or actions taken by the SA or a particular local office, which advise potential clients of the availability of the SNAP?
3. Do you know of any activities being conducted by the SA or a particular local office, which you consider to be good practices in helping customers obtain SNAP? (*e.g., actions or services the local office does very well, implementation of a process to refer people to services they may need or an initiative they have designed to speed up the certification process or cut down paperwork.*)
4. In terms of program access, do you have any suggestions on how the State or a particular local office could improve operations to better serve their clientele?

Do you have any suggestions on how the State could improve its online application to better meet the needs of clients (if applicable)?

5. Do you know of any activities, or lack of activities, by a local office that have resulted in customer service/program access problems for LEP persons? For speaking or hearing-impaired? Other physical disabilities?

6. Have you received any complaints from clients regarding SNAP? If yes, describe:

If yes, was the complaint(s) shared with the SA/LA and resolved in a timely manner?

If complaint was resolved, describe how:

7. Have you ever used the State's website to obtain information about SNAP? If yes, was the site helpful, easy to use, suggestions? (May want to have SA's website handy in case, agency requests).

8. Have you ever used FNS' website to obtain information about SNAP or download material? Website listed below, in case organization requests.
<http://www.fns.usda.gov/snap/>

9. For States with call centers that process applications: Are you aware of any barriers that exist which prevent potential clients from applying for SNAP benefits in your State's call centers?

Comments:

2. LANGUAGE ACCESS SERVICES

Suggested Language for Scheduling Letter:

We will review how the SA identifies which project areas and certification offices are required to provide bilingual material and bilingual staff or translation services as required in 272.4(b). We will evaluate the State's efforts to support and monitor local offices subject to these requirements. We will discuss our findings with SA staff.

Regulations: 7 CFR 272.4

272.4(b) Bilingual requirements - This section provides guidance to the States on how to identify the need for bilingual program information, certification materials, and staff or interpreters based on the estimated total number of low-income households in a project area that speak the same non-English language (single-language minority).

Definition: Single-language minority refers to households which speak the same non-English language and do not contain adult(s) fluent in English as a second language.

272.4(b)(1) and (6) – In determining the need for bilingual services, States can use the following information sources:

Census Data including Census Bureau's Current Population Report: Population Estimates and Projections, Series P-25, No. 627

- Local Bureau of Census offices
- Community Services Administration offices
- Community action agencies
- Planning agencies
- Migrant service organizations
- School officials

Or

- For a 6-month period, certification offices shall record the total number of single-language minority HHs that visit the office to make inquiries about the Program, file a new application for benefits, or be recertified.
- Those certification offices that are contacted by a total of over 100 single-language minority HHs in the 6-month period shall be required to provide bilingual staff or interpreters.
- State agencies shall also combine the figures collected in each certification office to determine the need for bilingual outreach materials in each project area.

272.4(b)(2) - The SA shall provide materials used in Program informational activities in the appropriate language(s) as follows:

(i) In project areas with less than 2,000 low-income HHs, if approximately 100 or more of those HHs are of a single-language minority;

-
- (ii) In project areas with 2,000 or more low-income households, if approximately 5 percent or more of those households are of a single-language minority; and
 - (iii) In project areas with a certification office that provides bilingual service as required in paragraph (b)(3) of this section.

272.4(b)(3) - The State agency shall provide both certification materials in the appropriate language(s) and bilingual staff or interpreters as follows:

- (i) In each individual certification office that provides service to an area containing approximately 100 single-language minority low-income households; and
- (ii) In each project area with a total of less than 100 low-income households if a majority of those households are of a single-language minority.

272.4(b)(3)(ii)(A) - Certification materials shall include the SNAP application form, change report form and notices to households.

272.4(b)(3)(ii)(B) - If notices are required in only one language other than English, notices may be printed in English on one side and in the other language on the reverse side. If the certification office is required to use several languages, the notice may be printed in English and may contain statements in other languages summarizing the purpose of the notice and the telephone number (toll-free number or a number where collect calls will be accepted for households outside the local calling area) which the household may call to receive additional information.

272.4(b)(4) - In project areas with a seasonal influx of non-English-speaking households, the State agency shall provide bilingual materials and staff or interpreters, if during the seasonal influx the number of single-language minority low-income households which move into the area meets or exceeds the requirements in paragraphs (b) (2) and (3) of this section.

272.4(b)(5) - The State agency shall insure that certification offices subject to the requirements of paragraph (b) (3) or (4) of this section provide sufficient bilingual staff or interpreters for the timely processing of non-English-speaking applicants.

Civil Rights Regulations: FNS Instruction 113-1 Section VII Limited English Proficiency located in the following FNS website: <http://www.fns.usda.gov/cr/crregulation.htm>

Suggested Review Tools:

BILINGUAL MATERIALS/TRANSLATION SERVICES INTERVIEW QUESTIONNAIRE

Organization:

Name/Title of Person Interviewed:

Address:

Phone:

Date of Interview:

FNSRO Reviewer:

1. How does the SA determine the estimated number of low-income HHs in a project area and certification office, which contain a single-language minority HH (no adults in the HH are fluent in English as a second language)? (272.4(b)(1) and 272.4(b)(6))

2. Please provide a list of all project areas that need program informational activities in other languages and in what languages this information is needed. If no such list is available, how does the State ensure that the bilingual material and translation service requirements are being met?

3. What are the SA's procedures for developing bilingual program information materials and bilingual certification materials according to 272.4(b)(2) and 272.4(b)(3)?

4. How does the SA ensure that its bilingual program materials contain accurate and complete information? (272.4(b)(2), 272.4(b)(3) and Policy Memo 91-05)

5. What determines when bilingual program materials are updated and/or modified? Are they being developed and/or modified simultaneously with English materials? If not, please explain.

-
6. How does the SA determine if the number of bilingual staff at certification offices and project areas are sufficient for the timely processing of LEP applicants? (272.4(b)(3) and 272.4(b)(5))

 7. Describe how the State and local offices ensure sufficient interpreters. Are they contracting with a language line, utilizing CAP staff or bilingual staff? How is staff trained in the use of these services?

 8. If the SA conducts outreach itself or through a community partner(s), how does the SA determine the need for bilingual outreach materials in each project area per 272.4(b)(6)?

 9. How does the SA ensure quality of interpreters and translators?

 10. Does the SA provide notice of availability of language services (including speaking/hearing)? Explain.

BILINGUAL MATERIALS/TRANSLATION SERVICES CHECKLIST

Organization:
Date of Review:
FNSRO Reviewer:

States Must:	Yes	No	Comments
Determine the need for bilingual services. (272.4(b)(1) and (6))			
Provide materials used in SNAP informational activities in appropriate languages. (272.4(b)(2))			
Provide certification materials in appropriate languages. (273.4(b)(3)(ii)(A))			
Provide client notices in appropriate languages. (273.4(b)(3)(ii)(B))			
Provide bilingual materials and staff or interpreters. (272.4(b)(4) and (b)(5))			

Additional Comments:

Additional Comments:

3. CLIENT NOTICES

Suggested Language for Scheduling Letter:

“We will review all State policies, procedures, and regulations governing eligibility notices, both automated or worker generated. We will review these notices for regulatory compliance and clarity of language to ensure that SNAP eligibility is clearly communicated. In addition, we will review the content and design of the documents and provide suggestions that would make the notices more user-friendly.”

Regulations: See Client Notices Checklists.

273.10(g)(1) - Initial Application. State agencies must provide applicants with one of the following written notices as soon as a determination has been made – but no later than **30** days after date of initial application.

- Notice of Eligibility (application approved)
- Notice of Denial (application denied)
- Notice of Pending Status (State has elected to pend case because some action either by State or household is needed)

Suggested Review Tools:

NOTICE OF ELIGIBILITY

273.10(g)(1)(i)(A)

State Agency equivalent: _____

Written Notices Must Have:	Yes	No	Comments
Amount of allotment			
If allotment contains benefits for more than one month notice should explain benefit amount			
Advise HH of variations in the benefit level based on changes anticipated at the time of certification			
Beginning and end date of certification period			
Right to request a FH			
Telephone number of SNAP office			
Name of worker to contact, if available			
Name and contact info for an organization that provides free legal services, if available			

Additional Comments:

**NOTICE OF EXPEDITED APPROVED
W/O ALL VERIFICATIONS CHECKLIST
273.10(g)(1)(i)(B)**

State Agency equivalent: _____

Written Notices Must Have	Yes	No	Comments
Statement that HH must provide verifications			
Explanation of certification periods and consequences of failure to provide verifications			

Additional Comments:

NOTICE OF DENIAL OF INITIAL APPLICATION CHECKLIST
273.10(g)(1)(ii)

State Agency equivalent: _____

Written Notices Must Have	Yes	No	Comments
Explanation of the basis for the denial			
Right to request a FH			
Telephone number of SNAP office			
Name of worker to contact, if available			
Name and contact info for an organization that provides free legal services if available			
For HHs that are potentially categorically eligible, request that the household notify the SNAP office if it is approved for public assistance or SSI benefits.			
If the SA has chosen to use a notice of denial when a HH fails to take action to complete the application process, the notice should advise the HH of the action it must take to reopen its application.			

Additional Comments:

NOTICE OF PENDING APPLICATION STATUS CHECKLIST
273.10(g)(1)(iii)

State Agency equivalent: _____

Written Notices Must Have	Yes	No	Comments
Explanation to the HH that its application has not been completed and is still being processed.			
Explanation regarding what action the HH must take and that its application will be denied if the HH fails to take the required action within 60 days of the date the application was filed, or at state option, 30 days following the date verification was first requested.			

Additional Comments:

NOTICE OF EXPIRATION OF BENEFITS CHECKLIST
273.14(b)(1)(ii)

State Agency equivalent: _____

Written Notices Must Have:	Yes	No	Comments
The date the certification period expires			
The date by which a HH must submit an application for recertification in order to receive uninterrupted benefits			
Consequences of failure to apply for recertification in a timely manner			
Notice of right to receive an application form upon request and have it accepted with only name, address and signature			
Address of the office where the application can be filed and information about alternative submission methods (online web address, if applicable), including the ability for SSI-only HH's to apply at an SSA office			
Notice of HH's responsibility to reschedule a missed interview and that failure to attend an interview may result in delay or denial of benefits			
Right to a FH			

Additional Comments:

NOTICE OF ADVERSE ACTION (NOAA)

273.13(a)

State Agency equivalent: _____

Written Notices Must Have:	Yes	No	Comments
Clear statement of the proposed action and the reason for the action			
For terminations, explain how benefits may be reinstated if this option is available			
Right to request a FH, explain the FH process, the continuation of benefits if a FH is requested, and the liability for over issuances if the FH decision upholds the SA			
Telephone number for SNAP office			
Name of worker to contact, if available			
Name and contact info for an organization that provides free legal services if available			
For disqualifications, explanation how the disqualified participant may be reinstated after the disqualification period is over			
For E&T disqualifications, how the HH member can avoid the disqualification before the disqualification period begins 7 CFR 273.7(f)(1)(ii)			

Additional Comments:

NOTICE OF REQUIRED VERIFICATIONS CHECKLIST
273.2(c)(5)

State Agency equivalent: _____

Written Notices Must Have:	Yes	No	Comments
The verifications that the HH must provide (are examples or alternate verifications identified?)			
Clear and simple language that meets LEP requirements			
Explanation of the period of time the verifications should cover			
A due date			
Statement of the SA's responsibility to assist the HH in obtaining required verification provided that the HH is cooperating			

Additional Comments:

NOTICE OF MISSED INTERVIEW
273.2(e)(3) and (h)(1)(i)(D), 273.14(b)(3)(iii)

State Agency equivalent: _____

Written Notices Must:	Yes	No	Comments
Inform the applicant that they missed their scheduled interview and that they are responsible for contacting the local office to reschedule the interview			

Additional Comments:

4. CLIENT COMPLAINTS

Suggested Language for Scheduling Letter:

We will conduct a review of the SA's system for analyzing complaints relevant to program access and customer service. We will examine how the State's analysis is used to address and resolve any overall problems that are discovered. FNSRO staff will also interview appropriate SA staff to determine what actions the State has taken to ensure recurring issues are resolved. Prior to the review, we will request a copy of the most recent annual analysis of client complaints that has been completed.

Regulations: 7 CFR 271.6

271.6 Complaint procedure. - (a) State agency responsibility. (1) General scope. The State agency shall maintain a system of its choosing for handling program complaints filed by participants, potential participants, or other concerned individuals or groups. This procedure also need not include complaints that can be pursued through a fair hearing. Complaints regarding such areas as processing standards and service to participants and potential participants would generally be handled under this complaint procedure.

(2) Minimum requirements. The State agency shall follow up on complaints, resolve complaints and take corrective action where warranted, and respond to the complainant on the State agency's disposition of the complaint. The State agency shall make information on the complaint system and how to file a complaint available to participants, potential participants and other interested persons. The State agency may make the information available through written materials or posters at certification offices or other appropriate means.

(3) Complaint analysis. The State agency shall maintain records of complaints received and their disposition, and shall review records at least annually to assess whether patterns of problems may be present in local offices, project areas, or throughout the State. The results of this review shall be provided to the Performance Reporting System coordinator for appropriate action, and for inclusion, if appropriate, in the State Corrective Action Plan in accordance with §275.16 of this chapter. The information provided to the Performance Reporting System Coordinator shall include the identification, if any, of potential or actual patterns of deficiencies in local offices, project areas, or throughout the State, and any identification of causes of these problems.

(4) Monitoring. FNS shall monitor State compliance with these requirements through the Performance Reporting System.

(b) Regional Office responsibility. (1) Persons or agencies desiring program information or wishing to file a complaint may contact the appropriate FNSRO. (2) Complainants shall be advised of the appropriate State complaint handling and fair hearing procedures. Upon household request, other complaints shall be pursued by the Department rather than the State agency, unless the complaint is one upon which the complainant wishes to request a fair hearing.

Suggested Review Tools:

COMPLAINT SYSTEM INTERVIEW QUESTIONNAIRE

Organization:

Name/Title of Person Interviewed:

Address:

Phone:

Date of Interview:

FNSRO Reviewer:

General Information

1. How are complaints usually received? What are the methods by which you receive complaints?
2. Is there a complaint hotline and what is the number? If yes, how long has the State operated a complaint hotline? What are the hours of operation for the hotline? Is a language option available? (Call to test the availability of language access).
3. How many staff handling complaints are bilingual? What languages do they speak?
4. What happens if a LEP speaker makes a complaint in another language and you do not have a staff person or other interpreter services who knows the language?
5. What is done with a complaint once it is received?

-
6. Who is responsible for resolving and responding to complaints (State or county employees) and ensuring that any necessary case actions/corrections have been made?

 7. Is there a time frame for responding to a client complaint?

 8. Are there written instructions on how to process or handle a client complaint? If yes, ask for a copy of instructions. How is staff trained in the process?

 9. Who responds officially to the client?

 10. Does the system include the complaints received at local offices or of any systemic problems brought to light through complaints at local offices? Describe.

 11. Does the SA have procedures in place to ensure that local agencies are tracking complaints? If so, are these complaints shared with the SA?

 12. Are there certain complaints that the system does not capture? Please explain.

13. How does the SA determine if the LA is adhering to the official procedure? What is done to correct this, if not?

14. How are civil rights complaints handled from the time of receipt? Are procedures in writing? How is staff trained, including new staff?

Public Notification

1. Are participants and the general public notified of how they may submit complaints (other than discrimination complaints or requests for FHs)? If so, how are they informed (publications, notices, posters, the media)? (Request a copy of the information provided to the public if it is a notice or a brochure.)
2. How is the process for the civil rights complaint process shared with the general public? Do media releases (written, radio, television, etc) include the required non-discrimination statement? Describe the SA's process for ensuring compliance. Is the required And Justice for All poster, or an approved equivalent, prominently displayed as required?

Data Analysis Questions

1. What is the State's system for maintaining complaint records (For example, is it an Access database, Excel spreadsheet, or is it maintained in the SA's computer system)? (How are complaints they gathered, organized, filed for summary and analysis)?

-
2. What information does this system capture? Does it capture the following:
 - Information on the type of complaint
 - Local office involved, if any
 - Disposition of the complaint
 - The date that the local office or responsible party followed up on the complaint
 - Whether the complainant is English or has LEP
 - The date the complaint was received and resolved
 - The name, address, and telephone number or other means of contacting the person
 - The nature of the incident or action or the aspect of program administration that led the person to file complaint

 3. Does the State analyze data from complaints to identify any potential or actual patterns of deficiencies in local offices, project areas, or throughout the State, as well as any possible causes of these problems?

 4. How often are the data analyzed? (Check to see that it is analyzed at least yearly).

 5. Who is responsible for the analysis of the complaints? Please provide us with the most recent analysis, and what actions were taken.

 6. Are complaints that are received via the FNSRO included in the State's complaint system and annual analysis when looking for trends or systemic problems?

-
7. How are the data analyzed? How are trends identified? Are complaints analyzed by reason/type, application processing, expedited service, EBT, etc? Are the data analyzed by locality?

 8. What staff (by name and title) is given copies of the complaint analysis reports?
 - Local staff?
 - FNSRO staff?
 - State staff?

 9. Who is responsible for developing corrective actions to address problems disclosed through the complaint system?

 10. Did the results of the most recent complaint review/analysis show any patterns or problems that must be included in the State's Corrective Action Plan?

 11. What corrective actions have been developed to address problems disclosed through the complaint system? Are they working?

 12. Do you have any suggestions on how to improve the client complaint system?

5. FAIR HEARINGS

Suggested Language for Scheduling Letters:

“We will review the SA procedures in the area of FHs to ensure that applicants’ and recipients’ appeals are correctly decided. In addition, on a State-by-State basis FH decisions may also be reviewed for the State’s timeliness in rendering FH decisions. As part of this review, we will complete a review of 20 upheld and reversed SNAP appeal decisions to determine whether the appeals process was correctly followed. We will be in contact with State FH staff to discuss how the sample of 20 appeal decisions will be selected. We will discuss the results of our review with the State’s FH staff.”

Regulations: 7 CFR 273.15

273.15(c) - Timely action on hearings (1) State level hearings. Within 60 days of receipt of a request for a fair hearing, the State agency shall assure that the hearing is conducted, a decision is reached, and the household and local agency are notified of the decision. Decisions which result in an increase in household benefits shall be reflected in the coupon allotment within 10 days of the receipt of the hearing decision even if the State agency must provide a supplementary ATP or otherwise provide the household with an opportunity to obtain the allotment outside of the normal issuance cycle. However, the State agency may take longer than 10 days if it elects to make the decision effective in the household's normal issuance cycle, provided that the issuance will occur within 60 days from the household's request for the hearing. Decisions which result in a decrease in household benefits shall be reflected in the next scheduled issuance following receipt of the hearing decision.

273.12(f)(3)(i)(A) - If the fair hearing is requested for both programs’ benefits, the State agency must conduct the hearing according to PA procedures and timeliness standards.

Suggested Review Tools:

FAIR HEARING INTERVIEW QUESTIONNAIRE

Organization:

Name/Title of Person Interviewed:

Address:

Phone:

Date of Interview:

FNSRO Reviewer:

1. How is a hearing scheduled? (Please include in your response information on the computer system used (if any), notification timeframe and system of notification of employed for hearing date and time for client/county worker.)
2. How does the FH Officer ensure that the Notice of FH is received by the client at least 10 days prior to the scheduled hearing?
3. What system is in place to ensure that the hearing is held and the client received the final decision within 60 days for a SNAP only FH and within the PA standard time frame for combined PA/SNAP FH?
4. How can a HH request a FH (e.g., in writing, by telephone, orally in person at LA)?
5. Please describe how your State handles cases that are withdrawn by the households either in writing or orally?
6. Are telephone hearings ever conducted? If so, under what circumstances? How is it decided who can get a telephone hearing?
7. How long does it take for client and LA to receive a written decision after the hearing is held?

-
8. When and how are clients notified of the hearing decision?

 9. How does the SA ensure that FH decisions are acted on at the local office? Who follows up with claims and restorations based on FH decisions?

 10. Is there a second level of review after a hearing is decided but the local office or recipient does not like the result? Does this happen often? How are these handled, tracked, and monitored?

 11. What training is given to the hearing officials? How are they kept up-to-date with new Federal laws, regulations, State policies, and State options?

 12. Please explain the entire procedure from how you receive a FH request from the client/case worker to how and when the client receives the final FH decision.

 13. Are the FH case records documented as to the implementation of the decision?

 14. Who controls tracking the implementation of required corrective actions?

-
15. Under what circumstances is a hearing request denied or dismissed?

 16. Has this particular issue been reviewed at the local office level by your office? If yes, when, where, and what were the findings?

 17. Has any type of reminder regarding accepting or denying FH requests been issued to local offices?

 18. Have you received complaints via the Hotline that hearing requests made to the local offices have been denied?

 19. What special accommodations are given to LEP HH's or those that are hearing or speaking-impaired?

 20. Is an interpreter provided for LEP persons?

 21. Who ensures that all the regulatory time frames are met?

 22. Do you offer agency conferences? If so, please describe the process in place.

Appeal Decision Review Log Sheet

State															
Organization:	FNSRO Reviewer:														
Date of Review:															

#	Appeal number	Receipt date of hearing request	Scheduling notice date	Date of hearing	10 days prior notice timeframe met	Decision date	Date of HH decision notification	Date LO or SA notified of Decision	Decision Timely?	Decision Correct?	Decision Cites Regs?	HH request postponement yes -enter date	*Postponement timeframe met	Did HH withdraw request for FH - yes -Date	**Date of written notice to HH confirming withdrawal	Adverse Notice in File	***Notes
1																	
2																	
3																	
4																	
5																	
6																	
7																	
8																	
9																	
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17																	
18																	
19																	
20																	

* Postponement shall not exceed 30 days and the time limit may be extended for as many days as the hearing is postponed 273.15 (c)(4)

**Did SA provide a written notice to HH within 10 days of the HH request confirming the withdrawal and providing the HH with an opportunity to request a hearing 273.15(j)(2)?

***Upheld/Reversed and type of dispute

FAIR HEARING CASE FILE REVIEW SHEET [7 CFR 273.15](#) *

Reviewer:

Date Reviewed:

Item	Comments	
Appeal Number:		
Adverse Notice in File? Yes No		
Type of dispute: Eligibility dispute, Benefits allotment dispute, Termination of benefits, Overpayment dispute, SA error dispute, etc.		
Receipt date of hearing request:		
Scheduling notice date:		
10 days prior notice timeframe met? Yes No Did the SA notify the HH in writing of the time, date and place of the hearing at least 10 days prior to the hearing. 7 CFR 273.15(l) ;		
Did the SA send a HH a written <u>notice</u> that included the following provisions? 7 CFR 273.15(l) :		
(1) Advise the HH or its representative of the name, address, and phone number of the person to notify in the event it is not possible for the HH to attend the scheduled hearing. Yes No		
(2) Specify that the SA will dismiss the hearing request if the HH or its representative fails to appear for the hearing without good cause. Yes No		
(3) Include the SA hearing procedures and any other information that would provide the HH with an understanding of the proceedings and that would contribute to the effective presentation of the HH's case. Yes No		
(4) Explain that the HH or representative may examine the case file prior to the hearing. Yes No		
State Hearing		
Date of hearing:		
Decision date:		
Date of HH decision notification:		
Was a written decision provided to the HH no later than 60 days after the hearing was requested. 7 CFR 273.15(c)(1) ? Yes No		
Date LO or SA notified of Decision: Within 60 days of receipt of a request for a FH, the SA shall assure		

Item	Comments	
that the hearing is conducted, a decision is reached, and the HH and LA are notified of the decision. 7 CFR 273.15(c)(1)		
Was Decision Upheld/Reversed?		
Local Level Hearing (If HH requested a local level hearing within 45 days of receipt of a request for a FH, the SA shall assure that the hearing is conducted, and that a decision is reached and reflected in the coupon allotment 7 CFR 273.15(c)(2))		
Date of hearing:		
Decision date:		
Date of HH decision notification:		
Was Decision Upheld/Reversed:		
Did HH appeal the local level decisions? Yes No If yes, within 45 days of receipt of any request for a State level review of a decision or for a new State level hearing, the SA shall assure that the review or the new hearing is conducted, and that a decision is reached and reflected in the coupon allotment. 7 CFR 273.15(c)(3)		
Did HH request postponement Yes No If yes -enter date		
Postponement timeframe met? Yes No Postponement shall not exceed 30 days and the time limit may be extended for as many days as the hearing is postponed. 273.15(c)(4)		
Did HH withdraw request for FH? Yes No If yes –enter date		
Date of written notice to HH confirming withdrawal: Did SA provide a written notice to HH within 10 days of the HH request confirming the withdrawal and providing the HH with an opportunity to request a hearing? 7 CFR 273.15(j)(2)		
Other Comments:		

* This is a direct hyperlink to this section of the regulations [7 CFR 273.15](#) - Click to go to regulations.

6. CALL/CHANGE CENTERS

Suggested Language for Scheduling Letter:

“In conjunction with our SA Program Access Review, we will review your Call/Change Center located at _____. Unlike the other target areas, which focus on specific program areas for which regulatory requirements exist, call/change centers represent a method of serving applicants/recipients that many States have implemented as they modernize their SNAP operations. The use of call/change centers is increasing, resulting in a significant impact on clients' experience of the Program. Even though regulatory standards do not exist, it is important to review the impact of these new methods from the standpoint of customer service and other applicable program requirements.”

Special Note:

When a call center is authorized to accept applications, conduct interviews, gather verification and determine applicant households' eligibility, these functions shall be reviewed in accordance with the provisions of the Program Access Review Guide. In particular, sections IV and VII of the guide should be followed as applicable to the functions of the call center including the sampling and review of case files of households certified or denied by the call center.

For example, the following is a partial list of the requirements that should be reviewed by interview/observation in the call center or by calling into the center:

- The agency documents the date an application is received.
- Households are permitted to file an application on the same day they contact the call center during office hours. The call center begins processing the application upon receipt of an application (paper or digital) that contains a name, address, and signature.
- The call center explains the right to file an application for food stamp benefits that includes: an explanation of the application processing standards and the right to file an application on the date of initial contact.
- Applicants are screened for eligibility for expedited service at the time assistance is requested.
- Households are informed that they can apply without an interview.
- Households are informed that they may submit an application that contains only the name, address, and signature of a responsible household member or an authorized representative.

Requirements that are not applicable to the call center or are addressed elsewhere (e.g., Notices) would not be reviewed relative to a call center.

Call/Change Center operations will be conducted by the standards set forth in the most current Fiscal Year Management Evaluation review guidance available at:

<http://www.fns.usda.gov/snap/government/program-improvement.htm>.

Regulations:

Merit Personnel: 7 CFR 272.4

7 CFR 272.4(a) - Merit personnel. (1) State agency personnel used in the certification process shall be employed in accordance with the current standards for a merit system of personnel administration or any standards later prescribed by the U.S. Civil Service Commission under section 208 of the Intergovernmental Personnel Act of 1970.

7 CFR 272.4(a)(2) - State agency employees meeting the standards outlined in paragraph (a)(1) of this section shall perform the interviews required in §273.2(e). Volunteers and other non-State agency employees shall not conduct certification interviews or certify food stamp applicants. Exceptions to the use of State merit system personnel in the interview and certification process are specified in §273.2(k) for SSI households, §272.7(d) for households residing in rural Alaska, and part 280 for disaster victims. State agencies are encouraged to use volunteers in activities such as outreach, prescreening, assisting applicants in the application and certification process, and in securing needed verification. Individuals and organizations who are parties to a strike or lockout, and their facilities, may not be used in the certification process except as a source of verification for information supplied by the applicant. Only authorized employees of the State agency, coupon issuers, coupon bulk storage points, and Federal employees involved in administration of the program shall be permitted access to food coupons, ATP's, or other issuance documents.

Suggested Review Tools:

CALL/CHANGE CENTER ANONYMOUS CALL SCRIPT

Organization:**Name/Title of Person Interviewed:****Address:****Phone:****Date of Interview:****FNSRO Reviewer:**

Use this format to evaluate the assistance and information provided during an initial contact with the State/regional/local change center. Ask the questions that follow, by either choosing to request SNAP benefits for you or on behalf of a relative. You may only get a recorded message, which may answer all the questions below. If you get a recorded message, provide a summary of the message on a separate sheet and attach it to this form. If someone provided information, record the information after each question.

If the State's call center accepts and process initial applications, use this initial contact to review for the requirements in section IV of the Program Access Review Guide; the provisions dealing with application submission and screening in particular.

If you are asked to leave a message in a voice mailbox, end the call because you cannot identify who you are. If you are asked for your address, do not give your home address or the FNSRO address because you can only apply in the State where you reside. Instead, say you are temporarily living with someone and are not sure of the address. (At this point, if there are multiple offices within the county, the contact should tell you the addresses of each so you will know where to apply.) If pressed for your name and/or address, say you have somewhere to go or someone is at the door and you will call back.

Attempt to call three times: once in the morning and report the results, once in the afternoon and report the results, and one call when the call/change center is closed to find out if there is a recorded message with the office hours to encourage people to apply. Use the "After Hours Call" Section to summarize the results of that call. Record hold times and busy signals with the date and time of the calls.

1. I need some help. I would like to get SNAP benefits. What do I need to do? Do I have to come into the office to apply?
2. What time can I come in today to apply and where do I go to apply?
3. What do I need to bring with me?

-
4. How long will I be at the office to apply?

 5. How long does it take to get SNAP benefits?

 - 5a. If the person says it will take longer than 7 days to get SNAP, ask if you can get them sooner than that. If the person presses you about your personal circumstances, state that, “I don’t have any income and only have about \$50 in the bank.”

 6. If I can’t get to the office, can I call again and ask to get an application by mail?

 7. Could I fax the application back? What is your fax number?

AFTER HOURS CALLS:

1. What time did you place the afterhours call?

2. How many times did the phone ring before you either got a recorded message or does the phone just keep ringing?

3. Describe the recorded message if there was one. Was the message in English only or was it also offered in Spanish or other appropriate language for the local office area?

REVIEW EVALUATION:

1. How many times did the phone ring before you either got a recorded message or someone to speak with or until the phone call automatically ended?

2. How many times did you have to redial because the line was busy?

3. Did someone provide the information or were you connected to a recorded message or voice mailbox?

CIRCLE: Person Recorded Message Voice Mailbox

4. If you were connected to a recorded message, were you able to:
 - Leave a message on voice mail? Yes No
 - Call another number? Yes No
 - Speak with someone else? Yes No

5. Give your impression of the person’s knowledge, helpfulness and manner:
 - Answered all questions correctly? Yes No
 - Explained options available for applying? Yes No
 - Volunteered information without being asked? Yes No
 - Courteous? Yes No
 - Provided information on relevant documentation? Yes No

6. Was assistance available in appropriate languages?

MERIT PERSONNEL REVIEW:

1. Does the call center employ non-merit system personnel? (if “No”, skip to next section)

2. List any certification functions or functions involving client contact that non-merit system personnel are performing in the call center. Indicate the following for each function:
 - a. Did the State receive approval from FNS to allow non-merit system personnel to perform each function?

- b. Is the function allowable with FNS approval?
- c. Is the function completely unallowable (e.g. only allowable for merit system personnel: determining eligibility, screening for eligibility, etc.)?
- d. How many non-merit system personnel are in the call center?

(see *Policy for Call Center Support Document* for a non-exhaustive list of functions)

Table 1 - Functions Performed by Non-Merit Personnel

Function(s)	Prior FNS Approval?	Allowable w/Approval?*	Unallowable?
<i>Providing general program information</i>	<i>No</i>	<i>✓</i>	

Total Number of non-merit system personnel: _____

**Some functions involving client contact may be allowable with FNS permission – see Policy for Call Center Support Document*

States who fail to receive FNS approval to use non-merit system personnel to interact with clients may risk losing Federal funding to support State SNAP operations.

- 3. If the State has received FNS approval for allow non-merit system personnel to perform certain functions that involve client contact, is the State is adhering to the approved FNS terms (e.g. functions, # of non-merit personnel)?

COMMENTS:

CALL/CHANGE CENTER MANAGER INTERVIEW QUESTIONNAIRE

Organization:
Name/Title of Person Interviewed:
Address:
Phone:
Date of Interview:
FNSRO Reviewer:

Number of call/change centers in State:

Name of call/change center	Address/phone number of center	Areas call/change center covers	Certification functions that are able to be completed via phone (e.g., initial application, recertification, change reporting)

What phone number(s) is/are provided to SNAP applicants and recipients and are the instructions for using the call/change center adequate for the need?

How are clients informed about the call/change center and the functions it performs? Is the phone number on notices, website, brochures, or are clients informed through some other way? Please provide copies of materials.

Who is responsible for processing the application or the change report?

What functions are performed at the call/change center?

Please provide any available data or reports from the last three months detailing how the call/change center is monitored in the following areas:

- Overall performance;
- Responsiveness at various times of the day or week;
- Customer service;
- Number of calls received;
- Percentage of calls answered by staff;
- Percentage of calls abandoned;
- Handling time (average, median, modes) – both recent and historical;
- Answer speeds (average, median, modes) – both recent and historical;
- Accuracy of information provided in response to client questions;
- Wait times;
- Hold times;
- Abandonment rate;
- Number of inquiries resolved by the interactive voice response (IVR) system;
- Type/category of calls.

Does SA have call/change center performance standards and measures in the following areas?

- Length of time for caller to get through to a live agent;
- Percentage of calls dropped by the system;
- Percentage of calls abandoned by the caller;
- Frequency with which the caller gets a busy signal or is told to call back later;
- Quality of call agent customer service;
- Number of inquiries resolved by the IVR, if any.

Does the State maintain a history of recorded phone calls provided by the call/change center?

How does the State agency ensure the call/change center is processing client-reported changes accurately and timely?

What information does the State review as part of their review of call/change center cases? Please provide a copy of the review form.

Please provide a copy of the call/change center's organizational charts and work assignments and call/change center policies and procedures.

Please describe the metrics used to manage workload. How are calls received and routed?

Do Supervisors have the ability to listen to calls to ensure that call behaviors are clearly identified? Are guidelines used when monitoring calls? If so, please provide a copy.

Is training provided to call/change center staff? If yes, please describe the frequency of training and the most recent topics. Is staff solicited for training ideas?

Please provide a copy of the training program resources provided to new staff.

Please provide the classification of staff (merit or non-merit) and what functions they perform.

Call/Change Center	Staff Name/Title	Merit/Non-Merit	Function(s) Performed

How does the State determine adequate staffing levels? What contingency plans are in place to cover exceptionally high volume days?

Has the State conducted any call/change center client satisfaction/customer service surveys in the past year? If so, please provide a copy of the results. If not, when was the last survey conducted?

Please provide us a copy of any participant complaint logs/files regarding issues with phone contacts or call/change center issues.

How often does the State evaluate if there an adequate number of lines to handle call volume and the potential for calls being dropped from the queues?

CALL/CHANGE CENTER REVIEW LOG SHEET

Use this format if you are reviewing a call/change center and are able to listen in on live phone calls or recorded phone call.

Organization: Address: Date and Time of Observation:	Name or Number/Title of Person Observed: Phone: FNSRO Reviewer:
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Customer Case #	Reason for Call	Agent Response Correct (Y/N)	Agent clear, courteous and professional?	Call Documented in Case File?	How Long Placed on Hold	Comments
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						

7. APPLICATIONS & INTERNET RESOURCES

Suggested Language for Scheduling Letter:

We will conduct a review of the SA's application and online application process to assess whether the State's website and application process promote program access and enable timely and appropriate processing of benefits for eligible applicants.

Regulations: 7 CFR 273.2(b)

273.2(b)(1)(i) - In prominent and boldface lettering and understandable terms a statement that the information provided by the applicant in connection with the application for food stamp benefits will be subject to verification by Federal, State, and local officials to determine if such information is factual; that if any information is incorrect, food stamps may be denied to the applicant; and that the applicant may be subject to criminal prosecution for knowingly providing incorrect information;

273.2(b)(1)(ii) - In prominent and boldface lettering and understandable terms a description of the civil and criminal provisions and penalties for violations of the Food Stamp Act;

273.2(b)(1)(iii) - A statement to be signed by one adult household member which certifies, under penalty of perjury, the truth of the information contained in the application, including the information concerning citizenship and alien status of the members applying for benefits;

273.2(b)(1)(iv) - A place on the front page of the application where the applicant can write his/her name, address, and signature

273.2(b)(1)(v) - In plain and prominent language on or near the front page of the application, notification of the household's right to immediately file the application as long as it contains the applicant's name and address and the signature of a responsible household member or the household's authorized representative.

273.2(b)(1)(vi) - In plain and prominent language on or near the front page of the application, a description of the expedited service provisions

273.2(b)(1)(vii) - In plain and prominent language on or near the front page of the application, notification that benefits are provided from date of application

273.2(b)(1)(viii) - The following nondiscrimination statement on the application itself even if the SA uses a joint application form: "In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, religion, political beliefs, or disability. To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, S.W., Washington D.C. 20250-9410 or call (202) 720-5964 (voice and TDD). USDA is an equal opportunity provider and employer."

Suggested Review Tools:

STATE WEBSITE CHECKLIST

	Yes	No	Comments
State SNAP website is easy to locate using a search engine such as Google or Bing			
Provides a toll-free number? If yes, is it for in-state only?			
Website includes, as appropriate, prescreening tools, benefit calculators, online SNAP applications, and any other web-based informational resources or program information			
Web-based resources are easy to locate and access from the SA's website (i.e., the information easy to locate if one is not familiar with the website)			
All the links on the State's SNAP website work			
SA's online policy manual is easy to navigate and to obtain information from a potential client's perspective			
There are areas with respect to the content and design of the site that that would make the site/resources more user-friendly			
State's website/SNAP home page up-to-date			
SA's website lists the name, address and office hours for each local office as a way to assist individuals interested in contacting a local office about SNAP			
Is the State's downloadable application for benefits easy to locate on the SA website?			
Is the SA's non-discrimination statement prominently displayed?			

Additional Comments:

ONLINE APPLICATION INTERVIEW QUESTIONNAIRE

Organization:

Name/Title of Person Interviewed:

Address:

Phone:

Date of Interview:

FNSRO Reviewer:

1. Describe the State's procedures for online applications with regard to:
 - Establishing the application filing date (including submitting applications with just a name, date, and signature);
 - Processing expedited service entitlement;
 - Obtaining a signature, if no e-signature is available; and
 - Assigning cases to workers, obtaining documentation, and scheduling and conducting interviews.
2. Can an interview (either telephonic or in-person) date and time be selected online at the time of application?
3. What are the State's procedures when a HH files an application and prior to approval or denial of that application, files one or more additional applications?
4. Are the additional applications examined to determine if the information differs from the initial application?
5. Are the additional applications held and processed once a determination is made on the initial application or do they supersede the original application?

6. How is the applicant informed of the disposition of the additional applications?

7. Is the process for dealing with such additional applications the same for online applications and paper applications?

APPLICATION CHECKLIST FOR SNAP

Applications are not subject to FNS approval, but the application must contain the following items required by the Food and Nutrition Act of 2008 (formerly the Food Stamp Act) and/or regulations. The following is a list of these requirements as stated in 7 CFR or statutes.

REQUIRED TO BE ON APPLICATION				
Does the application form <u>itself</u> contain the following statements/provisions as required?				
Reg. Cite	Requirement	Yes	No	Page/Comments
273.2(b)(1)(i)	<p>1. In prominent and boldface lettering and understandable terms a statement that information provided by the applicant in connection with the application will be subject to verification by Federal, State or local officials to determine if the information is factual; that if any information is incorrect, SNAP may be denied and the applicant may be subject to criminal prosecution for knowingly providing incorrect information.</p> <p><i>Prominent means noticeable or conspicuous, or large and projecting, significant. Type must be bold. Placement is at the discretion of the State.</i></p>			
273.2(b)(1)(ii)	<p>2. In prominent and boldface lettering and understandable terms a description of the civil and criminal provisions and penalties for violations of the Food and Nutrition Act of 2008 (formerly the Food Stamp Act). Placement is at the discretion of the State, but these must be on the application. These include the following:</p>			
271.5(b)	<ul style="list-style-type: none"> • Any member who breaks any of the rules on purpose can be barred from the SNAP for one year to permanently, fined up to \$250,000, imprisoned up to 20 years or both. S/he may also be subject to prosecution under other applicable Federal and State laws. S/he may also be barred from the SNAP for an additional 18 months if court ordered. 			
273.16(b)(1)	<ul style="list-style-type: none"> • Any member of your HH who intentionally breaks the rules may not get SNAP for one year for the first offense, two years for the second offense, and permanently for the third offense. 			
273.16(b)(2)	<ul style="list-style-type: none"> • If a court of law finds you guilty of using or receiving benefits in a transaction involving the sale of a controlled substance, you will be not be eligible for benefits for two years for the first offense, and permanently for the second offense. 			

REQUIRED TO BE ON APPLICATION

Does the application form itself contain the following statements/provisions as required?

Reg. Cite	Requirement	Yes	No	Page/Comments
273.16(b)(3)	<ul style="list-style-type: none"> If a court of law finds you guilty of having used or received benefits in a transaction involving the sale of firearms, ammunition or explosives, you will be permanently ineligible to participate in the Program upon the first occasion of such violation. 			
273.16(b)(4)	<ul style="list-style-type: none"> If a court of law finds you guilty of having trafficked benefits for an aggregate amount of \$500 or more, you will be permanently ineligible to participate in the Program upon the first occasion of such violation. 			
273.16(b)(5)	<ul style="list-style-type: none"> If you are found to have made a fraudulent statement or representation with respect to the identity or place of residence in order to receive multiple SNAP benefits simultaneously, you will be ineligible to participate in the Program for a period of 10 years. 			
273.2(b)(1)(iii)	<p>3. A statement to be signed by one adult HH member that certifies, under penalty of perjury, the truth on the information on the application, including the information concerning citizenship and alien status.</p> <p><i>NOTE: The application most likely will have two signature blocks: One signature on the front page to begin the application process and one elsewhere to attest to information on the application. The placement of the second signature block is at the State's discretion.</i></p>			
273.2(b)(1)(iv)	<p>4. A place on the front page where the applicant can write his/her name, address and signature. This must be on the front cover or the first page if no cover.</p> <p><i>Use judgment. If first pages are informational and can be detached for the HH to take home, this information can be on the first page of the form that can be left at the office. An administrative waiver is possible.</i></p>			
273.2(b)(1)(v)	<p>5. In plain and prominent language on or near the front page of the application, notification of the HH's right to immediately file an incomplete application as long as it contains the applicant's name, address, and signature of a responsible HH member or that of the authorized representative. Regardless of the type of system the SA uses (paper or electronic), it must provide a means for HHs to immediately begin the application process with name, address and signature.</p> <p><i>Use judgment concerning "on or near" the front page. Should probably be within first 3 pages. Plain means easily understood.</i></p>			

REQUIRED TO BE ON APPLICATION

Does the application form itself contain the following statements/provisions as required?

Reg. Cite	Requirement	Yes	No	Page/Comments
	<i>Prominent means noticeable or conspicuous, or large and projecting, significant.</i>			
273.2(b)(1)(vi)	<p>6. In plain and prominent language on or near the front page of the application, a description of the expedited service provisions.</p> <p>In relation to the above, the application must be designed in such a way as to identify the application as entitled to expedited service. See 273.2(i)(2). <i>Although the regulations do not require that expedited screening questions be on or near the front page, judgment should be used to determine the ease by which an application is identified as entitled to expedited service. If this process is not at the beginning of an application, evaluate the State’s method in place and document it.</i></p>			
273.2(b)(1)(vii)	<p>7. In plain and prominent language on or near the front page of the application, notification that benefits are provided from the date of application.</p>			
273.2(b)(1)(viii)	<p>8. The nondiscrimination statement:</p> <p>“In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, religion, political beliefs, or disability. “To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, S.W., Washington, D.C. 20250–9410 or call (202) 720–5964 (voice and TDD). USDA is an equal opportunity provider and employer.”</p>			
273.2(b)(1)(ix)	<p>9. For multi-program applications, the application must contain language which clearly affords applicants the option of answering only those questions relevant to the program or programs for which they are applying.</p> <p><i>The application must in some way identify those questions that are only relevant to SNAP. Placement is at the discretion of the State, but it is only reasonable it be at the beginning of sections soliciting information from the HH.</i></p>			
273.2(b)(2)	<p>10. If the State chooses to use Income and Eligibility Verification System (IEVS), it <u>must</u> notify all applicants for SNAP benefits at the time of</p>			

REQUIRED TO BE ON APPLICATION

Does the application form itself contain the following statements/provisions as required?

Reg. Cite	Requirement	Yes	No	Page/Comments
	<p>application and at each recertification through a written statement on or provided with the application form that information available through IEVS will be requested, used and may be verified through collateral contacts when discrepancies are found by the SA, and that such information may affect the HH's eligibility and level of benefits.</p>			
<p>273.2(b)(2)</p>	<p>11. If the State opts to use Systematic Alien Verification and Eligibility (SAVE) System, it must notify all applicants <u>on the application form</u> that the alien status of applicant HH members may be subject to verification by USCIS (formerly known as INS) through the submission of information from the application to USCIS, and that the submitted information received from USCIS may affect the HH's eligibility and level of benefits. <i>NOTE: This provision appears to conflict with the requirement of 273.2(f)(1)(ii) in that 273.2(b)(2) says "may", while 273.2(f)(1)(ii)(A) says "must". Section 273.2(b)(2) addresses the optional use of SAVE, while 273.2(f)(1)(ii) addresses the requirement to verify alien status. Alien status can be verified through other means than SAVE. Therefore, "may" is acceptable.</i></p>			
<p>272.6(g)</p>	<p>12. On the application, the State must obtain racial and ethnic data on participating HHs. The application form must clearly indicate that the information is voluntary, that it will not affect the eligibility or the level of benefits, and that the reason for the information is to assure that program benefits are distributed without regard to race, color, or national origin. The State must develop alternative means of collecting the ethnic and racial data on HHs, such as by observation during the interview, when the information is not provided voluntarily by the HH on the application. <i>The regulations no longer required the State to cite Title VI of the Civil Rights Act of 1964. It is permissible to cite it. Placement of the above information and the solicitation of racial/ethnic data are at the discretion of the State but it must be on the application.</i></p>			

REQUIRED TO BE ON APPLICATION OR ADDENDUM TO APPLICATION*

Does the application/addendum solicit the following information?

If not on application or addendum, evaluate the method used to inform the HH of this information **as required**. (i.e., *scripted interviews, interactive interviews)

				Add	Page/Comments
<p>1. On the application or addendum, the following question: "Have you or any member of your HH been convicted of a felony under Federal or State law for possession, use or distribution of a controlled drug substance (felony drug conviction) after August 22, 1996?"</p> <p><i>Unless a State law has been passed to allow the State to either modify or to opt out of this provision entirely, each individual applying for assistance must attest in the application process if the individual or any member of the HH has been convicted of a crime. Only convictions occurring after August 22, 1996, can make an applicant or recipient ineligible under this provision.</i></p>	Sec. 115 of PRWORA				
<p>2. On the application or an addendum, the following question: "Have you or any member of your HH had been convicted of trading SNAP benefits for drugs after September 22, 1996?"</p> <p><i>Sec. 813 of PRWORA. Need the date, as only convictions occurring after the above noted date can make an applicant or recipient ineligible under this provision.</i></p>	Food and Nutrition Act of 2008 Sec. 6(b)(1)				
<p>3. On the application or an addendum, the following question: "Have you or any member of your HH been convicted of buying or selling SNAP benefits over \$500 after September 22, 1996?"</p> <p><i>Need the date, as only convictions occurring after the above noted date can make an applicant or recipient ineligible under this provision.</i></p>	Food and Nutrition Act of 2008 Sec. 6(b)(1)				
<p>4. On the application or an addendum, the following question: "Have you or any member of your HH been convicted of fraudulently receiving duplicate SNAP benefits in any State after September 22, 1996?"</p> <p><i>Need the date, as only convictions occurring after the above noted date can make an applicant or recipient ineligible under this provision.</i></p>	Food and Nutrition Act of 2008 Sec. 6(j)				
<p>5. On the application or addendum, the following question: "Are you or any member of your HH hiding or running from the law to avoid prosecution, being taken into custody, or going to jail, for a felony crime or attempted felony crime, or violating a condition or parole or probation?"</p>	Food and Nutrition Act of 2008 Sec. 6(k)				

REQUIRED TO BE ON APPLICATION OR ADDENDUM TO APPLICATION*

Does the application/addendum solicit the following information?

If not on application or addendum, evaluate the method used to inform the HH of this information **as required**. (i.e., *scripted interviews, interactive interviews)

Requirement	Reg. Cite	Yes	No	App or Add	Page/Comments
<p>6. On the application or an addendum, the following question: "Have you or any member of your HH been convicted of trading SNAP benefits for guns, ammunitions, or explosives after September 22, 1996?"</p> <p><i>Need the date, as only convictions occurring after the above noted date can make an applicant or recipient ineligible under this provision.</i></p>	Food and Nutrition Act of 2008 Sec. 6(b)(1)				
<p>7. In addition, the application/addendum should include language similar to the following:</p> <p><i>If not on the application or addendum, evaluate how the HH is advised of these rules. (The following wording is not specifically in 271.5(b), but rather put in simpler terms.)</i></p>	271.5(b)				
<ul style="list-style-type: none"> Do not lie or hide information to get benefits that your HH should not get. 					
<ul style="list-style-type: none"> Do not use food assistance benefits to buy nonfood items, such as alcohol or cigarettes, or to pay on credit accounts. 					
<ul style="list-style-type: none"> Do not use, or have in your possession, EBT cards that are not yours and do not let someone else use your card. 					
<ul style="list-style-type: none"> Do not trade or sell EBT cards, or use someone else's card. 					
<p>8. The HH must be notified that the State must process applications for SNAP in accordance with SNAP procedures, including timeliness, notice, and FH requirements regardless of whether the application is for SNAP and other programs. Also, a HH may not be denied SNAP benefits solely because it has been denied benefits from other programs.</p> <p><i>If not on application or addendum, evaluate the method used to inform the HH of this information.</i></p>	273.2(b)(3)				
9. Privacy Act Statement. All HHs applying					

REQUIRED TO BE ON APPLICATION OR ADDENDUM TO APPLICATION*

Does the application/addendum solicit the following information?

If not on application or addendum, evaluate the method used to inform the HH of this information **as required**. (i.e., *scripted interviews, interactive interviews)

Requirement	Reg. Cite	Yes	No	App or Add	Page/Comments
and being recertified for SNAP benefits must be notified of the following. <i>The following or similar language must be on the application or an addendum</i>					
<ul style="list-style-type: none"> The collection of information on the application, including the SSN of each HH member, is authorized under the Food and Nutrition Act of 2008 (formerly the Food Stamp Act), as amended, 7 U.S.C. 2011-2036. The information will be used to determine whether your HH is eligible or continues to be eligible to participate in the SNAP. We will verify this information through computer matching programs. This information will also be used to monitor compliance with program regulations and for program management. 	273.2(b)(4)(i)				
<ul style="list-style-type: none"> This information may be disclosed to other Federal and State agencies for official examination, and to law enforcement officials for the purpose of apprehending persons fleeing to avoid the law. 	273.2(b)(4)(ii)				
<ul style="list-style-type: none"> If a SNAP claim arises against your HH, the information on this application, including all SSNs, may be referred to Federal and State agencies, as well as private claims collection agencies, for claims collection action. 	273.2(b)(4)(iii)				
<p>10. The application or an addendum should explain the filing date. It should state that the filing date is different if the HH is in an institution and applying for SNAP and SSI at the same time. In this case, the filing date is the date of release from the institution.</p> <p><i>It is a requirement to explain a filing date and that benefits are paid within certain time frames from the filing (application) date.</i></p>	273.2(c)(1)				

REQUIRED TO BE ON APPLICATION OR ADDENDUM TO APPLICATION*

Does the application/addendum solicit the following information?

If not on application or addendum, evaluate the method used to inform the HH of this information **as required**. (i.e., *scripted interviews, interactive interviews)

Requirement	Reg. Cite	Yes	No	App or Add	Page/Comments
<p>11. Language explaining to the HH it can file an incomplete application by leaving the first page containing a name, address and signature and take the rest of the application home to complete. It can then bring or mail, or if applicable, fax, the application to the SNAP Office.</p> <p><i>The HH must be advised of this information. If not on the application or addendum, evaluate how the HH is advised.</i></p>	273.2(c)(1)				
<p>12. It is highly suggested the application or an addendum contain language explaining to the HH it must have an interview and must show proof of some information given on the application.</p> <p><i>The HH must be advised of this information. If not on the application or addendum, evaluate how the HH is advised.</i></p>	273.2(d)(1)				
<p>13. The application or an addendum should also explain the 30-day processing time frame if the HH is not entitled to expedited service.</p> <p><i>HHs must be advised of the filing date. If HHs are not advised of processing time frames, they would not know if their application was processed timely. If this is not on the application or an addendum, determine how the HH is notified of this time frame.</i></p>	273.2(g)				
<p>14. The State must inform HHs of the right to name an authorized representative. The authorized representative for obtaining benefits may or may not be the same individual designated as an authorized representative for the application process or for meeting reporting requirements. The authorized representative designation must be made in writing.</p> <p><i>If not on the application or addendum, determine the method the State uses to explain this policy and how the designation is made in writing.</i></p> <p><i>Also, if an authorized representative completes the application for the HH, the application must solicit if it is an authorized</i></p>	273.2(n)(1)				

REQUIRED TO BE ON APPLICATION OR ADDENDUM TO APPLICATION*

Does the application/addendum solicit the following information?

If not on application or addendum, evaluate the method used to inform the HH of this information **as required**. (i.e., *scripted interviews, interactive interviews)

Requirement	Reg. Cite	Yes	No	App or Add	Page/Comments
<i>representative signing. There is nothing in the regulations spelling this out, but it is only reasonable to solicit who is completing the application.</i>					
15. At the time of application, each HH shall be informed in writing of its right to a hearing, of the method (orally or in writing) by which a hearing may be requested, and that its case may be presented by a HH member or a representative, such as a legal counsel, a relative, a friend or other spokesperson. <i>If not on the application/addendum, determine how the HH is informed of this right at application.</i>	273.15(f)				
16. States are to notify applicant HHs in writing of the disqualification penalties for intentional program violations <u>each time it applies for SNAP benefits</u> . Therefore, it is also strongly recommended that States include a statement on the application, or an addendum to the application, that informs HHs that paying for food purchased on credit with SNAP benefits is not allowed. Applicants should be aware that doing so could result in disqualification. <i>If not on the application or addendum, evaluate how the HH is advised</i>	273.16(d)				
17. If applicable, a statement on the application or an addendum that advises the HH that failure to report and/or verify any of the listed expenses will be seen as a statement by the HH that they do not want to receive a deduction for the unreported expense. This is a State Option. If the State opts to use this statement please see the 11/18/2009 Memorandum “ <i>Supplemental Nutrition Assistance Program (SNAP) ; Applications' Statements about Unreported and Unverified Expenses</i> ”	11/18/2009 Policy Memo				

These items are information that must be collected to determine eligibility. These may or may not be on the application. If not on the application, determine the method used to collect the information (addenda, scripted interviews, interactive interviews). Obtain a copy the document or system screen that solicits this information for review.

Reg. Cite	Question	Yes	No	App Add	Page/Comments
273.9(d)(6)(iii)(D)	1. The HH must be advised of the use of the Standard Utility Allowance and when the HH may claim actual expenses, if applicable. If the State mandates the SUA, actual expenses are not allowed. <i>Not required on the application or addendum. If no statement exists to explain this information, evaluate how HHs are told of the information. NOTE: The State's manual will indicate if they implemented a mandatory SUA. If so, this statement is not necessary.</i>				
	2. The first name, last name and middle initial of all HH members?				
273.7(f)(5)	3. A place for the HH to designate a Head of HH? (If applicable) <i>Check State work requirement options in the manual. If the State did not take the "head of HH" designation for work purposes, a head of HH will generally be the HH member making application.</i>				
	4. Birth date of all HH members?				
	5. Social Security Number for all HH members requesting food assistance?				
	6. Citizenship/alien status? Alien Registration # for each HH member, when applicable.				
	7. Is anyone a boarder? Is anyone a foster child or foster adult?				
	8. Is any member on strike?				
	9. Is any member disabled?				
273.7(j)(1)	10. Did any member leave a job or reduce their number of hours worked in the last 30-60 days, depending on State option? <i>See Reg. Cite and State manual for option taken.</i>				
	11. Is any member a student (above high school) between ages 18 and 49?				
	12. Name of school student attends, and the number of class hours per week? <i>Can solicit number of hours of class per week or other documentation or verification indicating full-time or part-time status. Generally, the school verifies full or part-time status.</i>				
	13. Sources of student income, amounts from each source, period of time income is intended to cover, and educational expenses? <i>Even if State excludes educ. income, it should solicit sources of income to ensure only appropriate income is excluded.</i>				
	14. Source and amount of liquid resources?				

These items are information that must be collected to determine eligibility. These may or may not be on the application. If not on the application, determine the method used to collect the information (addenda, scripted interviews, interactive interviews). Obtain a copy the document or system screen that solicits this information for review.

Reg. Cite	Question	Yes	No	App Add	Page/Comments
	15. Source and description of non-liquid resources (The HH can be asked for value of the resource(s), but the worker must determine if verification needed)?				
	16. Make, model and year of each vehicle. (The application should not solicit a fair market value from the HH. The worker must determine this.) <i>If the State excludes all vehicles from resources, this information would not need to be solicited. Check State manual for treatment of vehicles.</i>				
	17. Are any resources jointly owned with non-HH members? If so, evaluate accessibility.				
273.8(h)(1)	18. Has any resource been sold, traded or given away in the last 3 months? <i>If anything other than 3 months FOR SNAP PURPOSES is on the application, it is not correct.</i>				
	19. Unearned income: source, amount, and how often received?				
	20. Earned income: source, amount, and how often received?				
	21. Self-employment income: source, amount of gross income, and how often received?				
	22. Costs of doing business (if a self-employment enterprise)?				
	23. Medical expenses for elderly or disabled HH members, amount of expenses, how often paid, amount of reimbursements? <i>Pay attention to definition of disabled if on application, addendum or informational material. See 271.2.</i>				
273.9(d)(4).	24. Dependent care expenses, amount of expense, and how often paid. (Please note that dependent care applies to adult care as well)				
273.9(d)(5)	25. Child support paid to a non-HH member and is it legally obligated? Also solicit the legally obligated amount, the actual amount paid, and any arrearages				
	26. Shelter expenses, amount of expenses, how often paid?				
	27. Does your HH receive LIHEAP or does your HH expect to receive LIHEAP? <i>If the HH expects to receive or is receiving LIHEAP, they are automatically eligible for the SUA.</i>				
	28. Authorized representative information. <i>The HH has the right to name two authorized</i>				

These items are information that must be collected to determine eligibility. These may or may not be on the application. If not on the application, determine the method used to collect the information (addenda, scripted interviews, interactive interviews). Obtain a copy the document or system screen that solicits this information for review.

Reg. Cite	Question	Yes	No	App Add	Page/Comments
	<p><i>representatives: one to make application and report changes for the HH and one to use the EBT card. The authorized representative for obtaining benefits may or may not be the same individual designated as an authorized representative for the application process or for meeting reporting requirements. Whatever method is used to solicit authorized representative information, it should allow space for HH to name two representatives.</i></p>				
	<p>29. Does anyone outside your HH help pay any of your medical, dependent care or shelter expenses? If so, how much do they pay? Who helps you pay these expenses?</p>				
	<p>30. Does the application ask a question about current or past participation? For example, “Are you currently or have you in the past received benefits in this State?” <u>and</u> “Are you currently or have you in the past received benefits from another State?” These questions are helpful in determining whether there may be issues of duplicate participation.</p>				

ONLINE APPLICATION CHECKLIST FOR SNAP

Requirement	Y/N	Comments
<p>Does the system mandate that applicants complete a pre-screening tool prior to beginning the application?</p> <p><i>Note: States may not require an applicant to complete mandatory pre-screening as a precursor to beginning the application.</i></p>		
<p>Is the online account registration process simple?</p> <p><i>Note: If registration is required, States must not have a complicated registration processes that would deter a potential applicant from proceeding. User name, password and hint question(s) are acceptable but requiring a social security number or e-mail address is unacceptable.</i></p>		
<p>Does the system notify the applicant that the only required application questions are name, address, and signature? (7 CFR 273.2(b)(1)(v))</p>		
<p>Is there a place on or near the front page of the application where the applicant can provide their name, address and signature? (7 CFR 273.2(b)(1)(iv)) <i>Please note that with online applications, if the client can hit an apply button and be brought directly to the electronic signature page, this is acceptable.</i></p>		
<p>Does the online application allow applicants to file with just name, address, and signature? (7 CFR 273.2(c)(1), 273.2(b)(1)(v))</p>		
<p>Does the system allow applicants to submit the application at any point in the process after providing their name, address and signature? (7 CFR 273.2(b)(1)(v))</p> <p><i>Note: Online applications must allow applicants to file with just name, address and signature at any point in completing the application.</i></p>		

Requirement	Y/N	Comments
<p>Does the application list SNAP expedited service provisions on or near the first page? (7 CFR 273.2(b)(10)(vi))</p> <p><i>Note: The application must notify applications that the following households (HHs) are entitled to expedited service -</i></p> <ul style="list-style-type: none"> • <i>HHs with less than \$150 in monthly gross income and no more than \$100 in liquid resources;</i> • <i>migrant or seasonal farm worker HHs who are destitute, provided their liquid resources do not exceed \$100;</i> • <i>HHs with combined monthly gross income and liquid resources less than the HH's monthly rent or mortgage and utilities.</i> 		
<p>Does the online application provide a complete Privacy Act statement before or in immediate proximity to where the Social Security Number (SSN) is requested? (7 CFR 273.2(b)(4))</p> <p><i>Note: the Privacy Act statement must notify the applicant of the following -</i></p> <ul style="list-style-type: none"> • <i>collection of the SSN is authorized under the Food and Nutrition Act</i> • <i>information on the form will be verified through computer matching programs and may be shared with Federal and State agencies or private claims collection agencies</i> • <i>providing an SSN is optional all HH members who do not provide an SSN will be denied benefits.</i> 		
<p>Does the application allow an applicant to submit the application without providing an SSN?</p>		
<p>Does the online application describe the opt-out process as described in the Tri-Agency Guidance?</p> <p><i>Note: the Tri-Agency Guidance opt-out process includes -</i></p> <ul style="list-style-type: none"> • <i>HH members may choose not to seek benefits and will not be required to answer questions about</i> 		

Requirement	Y/N	Comments
<p><i>SSNs, or provide citizenship/immigration information.</i></p> <ul style="list-style-type: none"> <i>HH members who are seeking benefits must supply information about SSNs and citizenship or immigration status.</i> <i>The amount of benefits will depend on the number of people requesting benefits, but eligible HH members who apply will be able to get benefits even though some people in the HH are not seeking benefits.</i> <i>HH members who are not seeking benefits will be required to provide their financial information if it is needed to determine eligibility and benefit amount for persons who are applying.</i> <p><i>Guidance on conforming to the tri-agency guidance in online applications is available at:</i> http://www.fns.usda.gov/snap/rules/Memo/pdfs/Tri-Agency_Guidance_Memo-021811.pdf</p>		
<p>Are applicants able to submit an application without providing information about their citizenship or immigration status?</p> <p><i>Note: While applicant household members must provide information about their citizenship or immigration status before being approved for program benefits, the applicant must be able to submit an application that includes only the minimal information required by the law and SNAP regulations (name, address and signature).</i></p>		
<p>If the online application is for multiple programs, are applicants notified that they must only answer questions relevant to the program(s) for which they are applying? (7 CFR 273.2(b)(1)(ix))</p> <p><i>Note: Multi-program applications must clearly afford applicants the option of answering only those questions relevant to the program or programs for which they are applying.</i></p>		
<p>Are applicants able to review a summary of information entered prior to signing or submitting the final application?</p>		

Requirement	Y/N	Comments
<p>Does the application include the required non-discrimination statement? (7 CFR 273.2(b)(1)(viii))</p> <p><i>Note: SNAP regulations require the following non-discrimination statement -</i></p> <p><i>In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, religion, political beliefs, or disability.</i></p> <p><i>To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410 or call (202) 720-5964 (voice and TDD). USDA is an equal opportunity provider and employer.</i></p> <p><i>Or, guidance in FNS handbook 311 allows States to use the following non-discrimination statement on multi-program applications –</i></p> <p><i>In accordance with Federal law and U.S. Department of Agriculture (USDA) and U.S. Department of Health and Human Services (HHS) policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability. Under the Food Stamp Act and USDA policy, discrimination is prohibited also on the basis of religion or political beliefs.</i></p> <p><i>To file a complaint of discrimination, contact USDA or HHS. Write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410 or call (800) 795-3272 (voice) or (202) 720-6382 (TTY). Write HHS, Director, Office for Civil Rights, Room 506-F, 200 Independence Avenue, S.W., Washington, D.C. 20201 or call (202) 619-0403 (voice) or (202) 619-3257 (TTY). USDA and HHS are equal opportunity providers and employers.</i></p>		
<p>Does the online application include a perjury statement in immediate proximity to where the applicant signs the application? (7 CFR 273.2(b)(1)(i) through (iii))</p> <p><i>Note: The applicant must certify, under penalty of perjury, the truthfulness of the information included on the application form. The applicant must also be clearly notified that the information on the form is subject to verification and that providing false information may result in denial of the application and criminal and civil penalties.</i></p>		

8. TIMELINESS RATES

Suggested Language for Scheduling Letters:

“We will review the SA’s timeliness rate to determine whether the SA has a timeliness problem. As part of this review, we will examine the Federal and State-collected timeliness rates for the SA. We will also determine if there are discrepancies between the State-collected and Federal timeliness rates.”

Regulations: 7 CFR

Regulation Citation: 273.2(g), 273.2(h), 273.2(i)(3), 273.14

273.2(g) Normal processing standard —(1) Thirty-day processing. The State agency shall provide eligible households that complete the initial application process an opportunity to participate (as defined in §274.2(b)) as soon as possible, but no later than 30 calendar days following the date the application was filed, except for residents of public institutions who apply jointly for SSI and food stamp benefits prior to release from the institution in accordance with §273.1(e)(2). An application is filed the day the appropriate food stamp office receives an application containing the applicant's name and address, which is signed by either a responsible member of the household or the household's authorized representative. Households entitled to expedited processing are specified in paragraph (i) of this section. For residents of public institutions who apply for food stamps prior to their release from the institution in accordance with §273.1(e)(2), the State agency shall provide an opportunity to participate as soon as possible, but not later than 30 calendar days from the date of release of the applicant from the institution.

273.2(i)(3) - Expedited service Processing standards. All households receiving expedited service, except those receiving it during months in which allotments are suspended or cancelled, shall have their cases processed in accordance with the following provisions. Those households receiving expedited service during suspensions or cancellations shall have their cases processed in accordance with the provisions of §271.7(e)(2).

(i) General. For households entitled to expedited service, the State agency shall make available to the recipient coupons or an ATP card not later than the seventh calendar day following the date an application was filed. For a resident of a public institution who applies for benefits prior to his/her release from the institution in accordance with §273.1(e)(2) and who is entitled to expedited service, the date of filing of his/her food stamp application is the date of release of the applicant from the institution. Whatever system a State agency uses to ensure meeting this delivery standard shall be designed to allow a reasonable opportunity for redemption of ATPs no later than the seventh calendar day following the day the application was filed.

273.14 (d) - Timely processing. (1) Households that were certified for one month or certified for two months in the second month of the certification period and have met all required application procedures shall be notified of their eligibility or ineligibility. Eligible households shall be provided an opportunity to receive benefits no later than 30 calendar days after the date the household received its last allotment.

(2) Other households that have met all application requirements shall be notified of their eligibility or ineligibility by the end of their current certification period. In addition, the State agency shall provide households that are determined eligible an opportunity to participate by the household's normal issuance cycle in the month following the end of its current certification period.

Question	Yes	No	Comments
Current Timeliness Rates			
Does the SA have current timeliness issues (below 90 percent compliant)?			
Are there any suggestions how the SA might improve its timeliness performance?			
Does the SA currently have a CAP (below 90 compliant) and has the CAP been fully implemented? If there is no CAP in place, determine the reason and its current validity.			
If applicable, does the CAP adequately identify the causes of and actions to improve the timeliness issues – are resources and/or management issues addressed?			
Are there any suggested additions or improvements that could be made to the CAP based upon the causes of the timeliness issues (e.g. demonstrated commitment from leadership, business process reengineering, management controls to identify overdue cases)? Compare CAP to “Activities to Improve Timeliness Rates” below.			
Do the timeliness problems stem disproportionately from expedited, online, or call center applications?			
Does the SA collect its own timeliness data? (If not, do not answer the next 3 questions)			
Are there significant differences between the State-collected timeliness data and the Federal timeliness rates?			
Does the SA define a timely action differently than the Federal timeliness standards?			
Are the many of the cases that are timely for the State measure considered timely according to the regulations, but untimely according to the High Performance Bonus measure?			
Does the SA collect data on the timeliness of recertifications? (If not, do not answer the next question.			
Has the SA defined a recertification?			
Timeliness Rates Over Time			
Has the volume of applications received by the SA impacted the timeliness rates over the last 12 months?			

Question	Yes	No	Comments
Is the SA's timeliness rate improving?			
Is the SA's timeliness rate deteriorating?			
Has the SA made improvements over time to address its timeliness rate? How?			
Can the SA improve its timeliness rate further? How?			
Activities to Improve Timeliness Rates			
Has the SA instituted a system to alert the worker when the 7 day or 30 day time limits will be met soon? (If not, do not answer the next 2 questions)			
If so, does a supervisor oversee the alert system?			
If so, can the supervisor reassign work if there are staff absences?			
Does the SA or supervisor intervene if certain workers are not processing cases timely?			
Does the SA collect data on each local office individually?			
If so, does the SA perform additional reviews or provide additional training for local offices that struggle with timeliness?			
Does the SA every require underperforming local offices to perform corrective actions for timeliness?			
Can local offices monitor their timeliness?			
Has the SA provided any technical assistance materials regarding timeliness to local offices?			
Has the SA conducted any studies or reviews on its timeliness problems?			
If so, did the SA identify primary causes for the untimely applications? Please describe.			
Has the State applied for any waivers that might improve the timeliness rates (i.e. waiver of face to face interview, waiver to postpone interview for expedited cases, etc)?			
Does the SA require expedited applications to be processed in fewer than 7 days?			
Does the SA have centralized data processing?			
Has the SA performed any business process reengineering to address timeliness issues?			