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**The Department of Workforce Services Management Evaluation Report
Eligibility Services Division**

Submitted to: Casey Cameron, Deputy Director

Submitted by: Dale Ownby, Division Director
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Date submitted: May 4, 2016

The Performance Review Team recently conducted the Management Evaluation of the Supplemental Nutrition Assistance Program (Food Stamps) involving the Eligibility Services Division and One-Stop Employment Centers. The regulations at 7 CFR 275.8 provide that States shall review the national target areas specified by the Food and Nutrition Services (FNS). The FY2016 State target areas are Program Access, Employment and Training (E&T) and Able-bodied Adults Without Dependents (ABAWDs).

This report outlines the results of the evaluation in which two findings under the target area of Program Access have been identified and require corrective action. In addition to the findings, five observations with associated recommended actions have also been detailed under Program Access.

A response to the findings should be sent to Jennifer Wright within 30 days of receipt of this letter, these may be addressed by actions taken to correct the issue or a response with the rationale for disagreement with the findings or observations. A 45 day follow up with the Performance Review Team will be conducted for additional monitoring of the outlined findings.

If you have any questions, please contact Jennifer Wright at jenniferwright@utah.gov or 801 726-1209.

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*Supplemental Nutrition Assistance Program
Management Evaluation*

**Department of Workforce Services
Performance Review Team**

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Introduction

The SNAP Management Evaluation (ME) for the State of Utah, Department of Workforce Services (DWS) was conducted in March 2016. The review involved onsite evaluation of service delivery at One-Stop Employment Centers (EC's) and an assessment of the operational performance of department systems and processes.

The methodology included analysis of DWS performance reports, data analysis, process observation, interviews of EC staff and managers and a survey that was sent to eligibility workers who administer the Food Stamp program. The three EC's visited represent urban, suburban, and rural offices. The EC's visited were Salt Lake County Midvale urban office, Davis County South Davis suburban office, and Beaver County Beaver rural office.

The target areas of review are stipulated by FNS based upon federal regulations found in 7 CFR 275. Under the regulations, each project area in the state must be reviewed at least every three years. Under the Eligibility Services Division (ESD), Utah is now considered one statewide project area and must be reviewed annually.

For Federal Fiscal Year 2016, the evaluation focused on the national target areas of

- Program Access
- Employment and Training (E&T)
- Able-bodied Adults Without Dependents (ABAWDs)

Please reference attachment C for all data relating to ESD for each target area.

Program Access

The evaluation looked at the operations and systems that support individuals' connection to program services. This included observation of the pathways for services offered in the EC's. Findings, observations and recommendations indicated in this section are made with the purpose to ensure that no future barriers exist that may prohibit the client access to program services.

Local Office Observation and Interviews

Finding #1

In the Beaver and Midvale ECs, when asked how they handle a request for a face-to-face interview, office staff in both ECs indicated that a supervisor is contacted to arrange for an Eligibility Specialist to schedule an interview within 10 days.

Policy 775-2 #1, Interviews for Expedited Food Stamps, states that an interview is required to be completed in order to approve both expedited and the on-going Food Stamp application. If an applicant requests a face-to-face interview this must be scheduled as soon as possible and within 7 days of the application date in order for the customer to receive their expedited benefit, if eligible.

Similarly, if a Food Stamp applicant chooses to complete the required interview via phone, the customer should be encouraged to complete the interview as soon as possible and in no later than 7 days. EC staff were also asked to describe the process and information provided for applicants that choose not to complete the interview at the time of application. The Beaver EC staff indicated that they provide the customer with a card that lists the phone number to contact eligibility to complete the interview and that the applicant is instructed to call within 10 days. Because the initial interview is where it is determined if the customer is eligible for Expedited Food Stamps by the Eligibility Specialist, all applicants should be encouraged to complete the interview within the first seven days in order for the customer to not miss out on potentially expedited services that they may qualify for.

Finding #2

The reviewers discussed with upfront staff in each office visited their process of accepting paper applications. It was noted at the Beaver EC, that customers are given a toll-free number to contact Eligibility but are told to wait 2 days before calling in to complete the required interview for Food Stamp applicants in order to allow time for the application to be imaged into the imaging system. Utah currently has an On-Demand Food Stamp Interview Waiver (see attachment A) in place that stipulates that all applications must be screened for expedited service and that these households should be instructed to complete the interview within seven days. The state should not follow any practices that could delay the expedited service processing standards.

A procedure is currently in the operations manual, instructing call center Eligibility staff to complete the interview with the customer even if an application is not yet showing in the imaging system. It is recommended that all staff, both Eligibility and EC, receive refresher training on this procedure to ensure that Food Stamp applicants are not told to wait two hours to call for their interview, due to their application not yet showing in the imaging system.

Observation #1

During the Midvale EC evaluation, reviewers observed that a large, clear plastic drop box is located at the front entrance that is available for customers to leave paperwork including applications and is locked.

Recommendation #1

In order to maintain the confidentiality of the customer's personal information that may be potentially visible through the clear drop box, it is recommended that the drop box be modified or changed to a material that is not transparent.

Observation #2

During the Midvale EC evaluation, reviewers inquired about the process for issuing emergency EBT cards that are given out in person at the office verses being mailed to the customer. The staff member interviewed at the Midvale EC indicated the correct steps are taken to ensure that the current procedure is being followed; however there is a concern that the cards are not being stored in a locked cabinet.

Recommendation #2

It is recommended that the EBT log and cards be stored in a secure location both during and after regular business hours for confidentiality and security reasons.

Eligibility Staff Survey

In March 2016, an electronic questionnaire was distributed to Eligibility call center staff in order to identify what, if any, barriers exist in administering SNAP. Within the survey staff were asked questions regarding customer education, completing the Food Stamp application interview, requirements to qualify for Expedited Food Stamps and defining discrimination on the bases of protected classes. The majority, 95.34%, of the Eligibility Staff who participated in the survey successfully answered the questions (for survey results, see attachment B). As a result, no findings were cited or recommendations given based on the responses of the survey.

Eligibility Phone System

There were no findings cited or recommendations given in this area. DWS utilizes a statewide, toll-free number for customers to contact eligibility regarding their application and for on-going cases. The after-hours message includes information about normal business hours and how to access individual case information through the web portal, myCase, on the DWS website. The phone system has Interactive Voice Response (IVR) that offers a self-service option that is available 24/7. The recorded messages for the three EC's were reviewed for content. All three had consistent messages regarding office hours, location, and information in both English and Spanish for the Food Stamp program.

The reviewers viewed ESD phone data over the last six months (October 2015 – March 2016) to measure call wait times as well as the total number of calls received by Eligibility Call Center staff statewide. The phone system also has a call-back option if wait times exceed 15 minutes. The average call wait time for this time period was 7:42 minutes and on average, the ESD answers 89,821.83 calls per month. The ME reviewers feel that this is acceptable and not a deterrent to program access.

On-line Application

The department has been offering an online application since 2008, which is available through the myCase system at jobs.utah.gov. Applicants are encouraged to apply on-line, but paper applications are available if requested. Connection team staff are available onsite in the employment centers to assist with both the on-line and paper applications as needed. A customer support team is also available via on-line chat connection or by phone to assist with the application process.

Observation #3

In the Beaver office it was mentioned that customers with limited computer skills often times have difficulty navigating through the online eligibility process. As a result, EC staff will often assist customers who do not have computer access or an existing email account, with setting up an account in order to access myCase, by suggesting a way to create passwords in an attempt to

assist the customer in remembering their password the next time they come into the EC to access their case online.

Recommendation #3

Due to confidentiality issues, the DWS worker should not provide password suggestions that are the same for all customers. They may, however, assist or coach the customer on how to best choose a confidential password.

Customer Relations

No findings were cited or recommendations given in this area. As part of the ME, reviewers reached out to Nikki Stark-Kovler, Constituent Services Specialist, who handles complaints from applicants and recipients for ESD. She indicated that she had not received any complaints related to customers being denied benefits or having their benefits closed due to discrimination. Nikki mentioned that there have been complaints however from customers who do not have access to the internet, computer or are not comfortable using technology to complete an application or review.

Civil Rights Compliance

The department was found to be within compliance and no findings have been cited in this area. All call center and EC staff have received Civil Rights training and the required “And Justice for All” posters were prominently displayed in the front lobby of all Employment Centers visited. In March 2015, the department created an online system in which customers can use when filing a complaint and can be accessed through the DWS webpage.

The reviewer also questioned the DWS EO officer, Carolyn Parsons, to inquire about any trends that she has observed in dealing with customers in regards to barriers that customers face in accessing the Food Stamp program. Carolyn stated that she continues to see an increase in the number of customers who are deaf or hard of hearing and that the department is providing more ASL interpreters and face-to-face interviews than in previous years. Video technology is currently being used in three Salt Lake ECs and one in the Ogden EC, as an accommodation to assist customers who are deaf and hard of hearing.

Carolyn states that she has also seen an increase of staff within the department reaching out on behalf of their customers to assist in the accommodations process for those to apply for or participate in DWS programs and services. Carolyn has worked very closely with operations over the last year reviewing and updating processes, policies and procedures to ensure that staff are properly trained to make the appropriate referrals to her, as the ADA/Section 504 Officer, in order to provide customers with disabilities the necessary accommodations.

Observation #4

When interviewing an EC staff at the South Davis EC, she was asked to explain the process that is followed for a customer to file a general and discrimination complaint. The staff indicated that if she was unable to resolve the complaint at the local level, she would refer them to the online complaint system from the DWS webpage. However, she was not clear on identifying discrimination complaints verses general complaints from the customer.

Recommendation #4

EC staff should not attempt to resolve the complaint at the local level if the customer's complaint contains a protected class. It is recommended that all EC staff review the Complaint Discrimination procedure in order to make a clear distinction between discrimination complaints on the basis of protected classes compared to other customer complaints.

Case Reviews

The review team gathered performance data within ESD in order to identify any potential access or Civil Rights compliance issues. The department was found to be within compliance in this area. The data collected is specific for the SNAP program and was gathered from the QC review results as well as the Performance Review Team (PRT) who perform program reviews for benefit determinations. Reviews are performed for all Eligibility Specialists within ESD to assess issuance and recertification (review) timeliness, and case review and benefit issuance accuracy. (See attachment C)

PRT Active Reviews: For the period of October 2015 through March 2016, there were 4,844 reviews completed for the Food Stamp program, with an accuracy rate of 91.52%.

- The top four causal factors cited were incorrect estimates of income, changes incorrectly acted upon, shelter costs incorrect, and incorrect benefit start dates.

PRT conducted Negative Reviews (on closed/denied Food Stamp cases): For the period October 2015 through March 2016, there were 569 cases were reviewed with an accuracy rate of 95.08%

- The top three error causal factors noted were; incorrect notice sent, incorrect effective dates and information not used correctly.

QC accuracy rates: For the 2015 QC year showed 97.55% for issuance accuracy and 89.85% for denials and closures.

- Wages and Salaries were cited as the top error element for Active QC Food Stamp reviews.
- Verification was cited as the top error element for QC reviews of Food Stamp closures and denials. Utah's Corrective Action Plan includes addressing the Case and Procedural Error Rate (CAPER) and will not be cited as a separate finding here.

QC application timeliness rates: For the 2015 QC year showed 95.73% and Recertification (review) timeliness was 78.70%. Reviewers also observed that 91.84% of untimely re-certifications were classified as customer caused.

Community Partners

Community partner/agencies that have a connection to SNAP were interviewed in conjunction with each EC visited. Reviewers met with the Salt Lake Community Action Program (CAP) in the South County Neighborhood Center, the Bountiful Food Pantry and the Beaver County Food Pantry. There were no findings in this area. Feedback provided was shared with the applicable local EC management.

Observation #5

Reviewers met with Melissa Stapley at the CAP office located within the South County Neighborhood Center located in Midvale. After inquiring about the working relationship and interactions the local CAP office has with the DWS, she mentioned that although she does refer customers to DWS, there is not currently a relationship with the Midvale office. A flier that she shares with customers about applying for food assistance lists the Metro EC address, even though the Midvale EC is located within a few blocks of the CAP office. There were no other Food Stamp materials or applications available at the CAP office.

Recommendation #5

It is recommended that the Midvale EC provide Food Stamp brochures and applications to the local CAP office and to make contact with them on a regular basis with the intention to better serve Food Stamp applicants in the area.

Corrective Action Plan (State CAP)

The state's CAP currently focuses on one initiative, the Case and Procedural Error Rate (CAPER). The state agency continues to address the CAPER with PRT case reviews, targeted support, direct eREP fixes and measures taken to reduce the volume of pending work.

Activities for FFY 2016 include:

- Real Time Case Reviews, performed by the Performance Review Team (PRT) are continuous. The data collected is reviewed for error trends. The purpose of these reviews is to identify training needs among staff and potential system errors.
 - The department's CAPER accuracy rates increased by 4% in FFY 2015 from the previous year.
- Targeted Support is the follow-up to the PRT process. Workers identified by supervisors as needing additional help (based on the results of their PRT case reviews) receive either one on one or small group training to improve accuracy.
- Direct eREP Fixes. This activity is designed to address issues related to notices generated by the eligibility computer system. The eREP system fixes have had a positive effect on the Case and Procedural Error Rate.
 - The percentage of CAPER errors associated with notices decreased by 17% from FFY 2014 to FFY 2015.
- Reduce Volume of Pending Work; the department has an ongoing goal to reduce the volume of pending work waiting to be processed. Electronic Verifications will be utilized as much as possible to reduce the amount of items that need to be provided by the customer. Timeliness Training was given for all ESD staff in June 2015 which is now being reinforced by adding this measure to workers performance metrics for close monitoring.
 - The department saw a significant improvement in Food Stamp program Timeliness from FFY 2014 to FFY 2015 by reducing the average days to decision by 4.21 days. The timely rate for Expedited Food Stamps also improved from FFY 2014 to FFY 2015 by 9.65%.

A review of Employment and Training (E&T) and Able Bodied Adults Without Dependents (ABAWD) performance is mandated as part of this year's Management Evaluation. The reviewers looked at both PRT and QC data to determine Utah's accuracy in identifying those required to participate. The errors and rates noted in this section do not suggest a trend that would require any findings or corrective actions.

PRT Case Reviews:

- The PRT reviewed 4844 Active Food Stamp cases between October 2015 and March 2016. Of those, only 24 cases, 0.49% were cited with errors related to work registration.
- None of the 569 cases reviewed for correct negative actions by the PRT were found to be cited with errors related to E&T or ABAWD.

QC reviews:

- Active reviews conducted by QC during the 2015 year (October 2014 – September 2015), .69% of error dollars were associated with Employment & Training Programs. No errors were cited in association with time limited participation (ABAWD).
- The 2015 QC year data shows 11.76% of case errors for negative or CAPER reviews were due to E&T programs. One ABAWD error was cited, totaling 1.47% of the errors cited in 2015.

Conclusion

The findings, observations and associated recommendations outlined above describe aspects of the local office operations that will assist with the department in meeting compliance standards, promote program access for Food Stamps and increase customer service by providing timely and accurate benefits.

If you have any questions regarding information in this report, please contact Leslie Henderson, Quality Assurance Manager, lhender@utah.gov, 801 245-4945 or Jennifer Wright, Program Specialist, at jenniferwright@utah.gov, 801 726-1209.