



## **FOOD ASSISTANCE ACTION COMMITTEE**

**A Federal, State and County Partnership for policy interpretation and review, food stamp outreach, Quality Control and corrective action activities.**

### **MINUTES**

**DATE: TUESDAY, January 26, 2010**

**TIME: 9:30 a.m. to 3:00 p.m.**

**LOCATION: County of Riverside  
Department of Public Social Services  
3950 Reynolds Road  
Riverside, CA 92503**

- 1. Welcome/Housekeeping**
- 2. Review of Previous Minutes – No changes were made.**
- 3. RADEP report – No updates.**
- 4. FS Program Policy Updates**

#### **Legislative Update**

Emancipated Foster Care Youth Project- The third proposal will be submitted to FNS before 3/1/2010. Requesting full benefits for 12 months effective 1/1/2011

#### **Policy Development**

Face to Face Interview waiver – a survey is being developed and will soon be sent out to the counties.

Restoration of Benefits Waiver - CWDA has a committee working on this policy change. Target date 3/1/10. Regulation change will allow for restoration with a break in aid when termination reason is cured in the month of term. This will apply to NAFS only (by default due to CalWORKs receiving TFS). San Bernardino asked why the benefits would be prorated on the waiver. Answer: This is the way the Bill is written. Note – Good Cause rules still apply when appropriate which precludes pro-ration.

Quarterly Reporting - received a six month extension with condition of State submitting a work plan. The plan is to go six months or Federal QR rules must be submitted to FNS by 2/18/10 could then receive another 18 months of QR using federal rules.

Modified Categorical Eligibility-MCE – Could be expanding to all eligible households and not just those with children under 18 years of age. There will be a work group.

Expedited Services – A reminder ACL is being sent out to counties regarding ES and regular application timeframes.

### **Court Litigation**

No updates

### **County Question**

San Bernardino asked about status of California receipt of approval for continued QR.

Response: State received a 6 month extension with the condition that a work plan be submitted. Feds are pushing for California to go to 6 month reporting OR Federal QR rules. California must submit their plan to FNS so that they will be allowed to keep QR for another 18 months.

### **FS Field Operations Bureau Quality Control Updates – Marlene Fleming**

Negative Case Reviews – Los Angeles, Petra did a presentation of Best Practices used for negatives.

Daphne will provide hard copies to the FAAC members. San Bernardino will do a presentation at the March meeting.

**QC Error Rates - Actives/Negatives**

SAMPLE	California %	National Average
Active Sample	3.98%	4.26%
Negative Sample	11.9%	8.22%

(Data is through September '09. Counties were encouraged to do focus reviews on Negatives.)

**QC Sample Completion Rates**

ACTIVE 83.9% through 9/09. California must reach 98% to avoid a penalty.

**QC Policy Updates** – None

**QC Training Request**

There are none pending. If you want training send information to Marlene ASAP.

**Federal Differences/Arbitrations - Marlene**

Two Federal differences were received and four more are coming. Cases were completed correctly but RADEP has the dollars of error amount on the entry fields that does not match with the computations. This is probably caused by auditors not changing all of the right fields when there is a change in the results. QC supervisor and State are not catching the discrepancy at their levels. Carlos and RADEP are working on a technical fix to catch error which will hopefully be in place next week.

**Timeliness of Applications Processing**

Based on DFA 296X for the last 4 quarters, statewide average is at 92.9% from 10/08-9/09. FOB stressed that all counties need to be at 90%.

Statewide average of applications approved within 30 days is 88.5%, again needs to be at 90%

Welfare Rights advocates are working with clients and encouraging law firms to sue counties that don't process apps timely.

There is a national focus to get eligible households on the benefits in a timely manner. A reminder was given to include ES determination in cases that are subsequently denied.

## **County Concerns**

San Bernardino – Virginia asked how we will review to modified CE. Response they are subject to net income test and not to CE. FOB will request information be added to *Help* screen.

Riverside – Greg asked if resources are still recorded for MCE cases.  
Response – do not record for MCE

Orange – Luz asked if Comp I cannot be verified what action should be taken. Response Feds stated do likely conclusion *if you can document the pattern*. If income is sporadic, you can use a client sworn statement.

FOB and Kern County asked for FED interpretation in writing. There was lengthy discussion about *likely conclusion* – Comp I and Comp II and how to use likely conclusion on Comp I. Reminder was given Comp I must be completed before comp II. Do not confuse the eligibility test with the allotment test in comp I or II. Also, must document why you are unable to get verification before using *likely conclusion*.

FOB will talk to FNS, research and then send something out.

## **6. FS FOB Management Evaluation Updates- Jerry Parker**

### **2010 Schedule of ME Reviews**

Jerry Parker stated that the FFY 2010 schedule has changed due to counties coming up on C-IV. El Dorado and Napa are done.

### **SEP Funds -**

Not all counties have turned in expenditures from the 2009 conference. Richard will let those counties know.

## **7. USDA – FNS Federal Updates**

### **FNS Operations – Hope Rios**

See SNAP website link under *what's new*

Nov 6 Guidance on Pandemic SNAP benefits for children certified eligible to receive free and reduced price school lunch benefits during school closure.

Nov 6 Clarification was sent on census waiver on which income can be waived. The state submitted a letter of interest.

Dec 15 Q&A regarding Broad-Based Categorical Eligibility

Dec 30 Q&A chart showing which states are using on-line applications and which states have it available.

SNAP helps stimulate the economy every \$5 in SNAP benefits generates \$9.20 to the local economy.

### **FNS QC – Dawn Baker**

UIB \$25 as of 11/01/09 not counted in budget. Half of Aug all of Sept, no hold harmless. Nov, Dec held harmless, 12/19/09 thru 4/17/10 is the 120 day hold harmless. Counties need to ensure negative actions were not incorrectly denied.

Question – does this apply to the TFS budget? Answer: No, unless the household was erroneously terminated from CalWORKs. There are no changes to be applied to the TFS budgets impacted by the UIB exemption.

Drop cases- when cases are dropped and sent to FNS they do not have all of the verifications received by the County. Transmittal 09-04 pg 3 item 4 explains that verification documentation supporting the reason for the drop and everything the county discovered during their review must be included. FNS is going to be aggressively pursuing DROP cases this year. Kern representative stated that we were told before when we drop Code 2, that we were to only send the information that pertained to the drop reason, like “unable to locate”. Dawn stated that if a case was dropped Code 2 FNS is going to try to complete these cases. Reminder for code 2 drops- counties should exhaust all attempts to locate customers.

There is a national effort for FNS to look at Code 3 Drops ...especially in states with low completion rates. It is essential that we document our actions appropriately because if FNS finds that we should have completed the reviews, they will complete them with whatever information we have supplied. Richard reminded QC supervisors they should review drops to see if they can be completed on a monthly basis not at the end of the year. California is 48<sup>th</sup> out of 52 for national average 91.39% for QC completion rate. The Western region w/o California is 95% Lisa stated the higher the DROP rate, the heavier the Active error rate is weighted. California's adjustment is 1/4<sup>th</sup> percent. FNS statisticians are pushing for a higher penalty. There is a belief that we are dropping cases to avoid errors. Our low completion rate will affect California corrective action plan to FNS.

Daphne expressed concern regarding the FNS belief on the Code 3 DROPs and identified a variety of economic and caseload growth reasons related to the increase in these drops. The county option of moving the face-to-face to district offices has also impacted the Code 3 DROPs. Also since the sample is not adjusted early in the year, counties often are receiving samples larger than at the end of the year, which could also impact completions since we did not receive additional staff to complete the larger samples early in the year.

She also indicated that there have been significant increases in the negative actions due to a large influx of applicants who do not meet FS program requirements due to excess income and property. The profile of the FS applicant has changed considerably within the past two years. Fortunately, the negative error rate does not impact active error rate and there is no regression on the Negative sample because the line staff are struggling to keep up with the large increase in applications from ineligible applicants, sometimes missing detail in their documentation due to the heavy workload.

Richard states that in the March meeting Ana Capetillo's staff will also talk about CA sample size and RADEP.

### **FNS Jamie Ortega**

Cases are coming through as completed with nothing in the case. On the drops, they are not seeing supporting documents.

RADEP is missing narration to address elements.

### **FNS – Katherine McQueen**

FNS would like to see templates in RADEP to ensure the right documentation is included in the correct areas of RADEP. Richard, Carlos and FNS will get together and determine an approach for overall training needs and develop guidelines and templates for the narrations in RADEP. Katherine would also like to see the actual computation figures in RADEP, rather than just the end result.

Counties/California would like to retain the \$50 error threshold for payment errors. FNS headquarters is evaluating this due to other state input. At this time, we have returned to the \$25 error threshold.

NPAWG completed a review of Los Angeles and San Bernardino counties. Observations will be sent out with some recommendations.

FNS has not made a decision on the QC waiver request for No Face-to-Face interview for sample cases with allotments under \$100.

**8. 2010 Annual FS Conference**

Due to the FS Bureau's current workload, the conference will be moved from May, and will be probably be in September.

There is a new FOB Chart, Richard will send to Daphne who will send out to FAAC.

**9. Next meeting March 23, 2010:**      **California Dept of Social Services  
Mammoth Conference Room  
2450 Del Paso Rd. Ste. 200  
Sacramento, CA 95834**