



Food and  
Nutrition  
Service

Park Office  
Center

3101 Park  
Center Drive  
Alexandria  
VA 22302

**SUBJECT:** Supplemental Nutrition Assistance Program (SNAP) Questions and Answers on Quality Control (QC) integrity initiatives for FYs 2015 and 2016

**TO:** Regional Directors  
SNAP, All Regions

Attached is the first in a series of questions and answers regarding SNAP initiatives to improve the integrity of the QC process. On June 24, 2016, Food and Nutrition Service (FNS) Under Secretary Kevin Concannon sent a letter to all State SNAP Commissioners regarding changes to the QC process for FYs 2015 and 2016. Attached are questions received from States in response to this letter. Future memos will address State questions about details of the FY 2016 one-tier QC review and the concerns about bonuses and liabilities.

If you have any additional questions, please contact Stephanie Proska at [Stephanie.Proska@fns.usda.gov](mailto:Stephanie.Proska@fns.usda.gov).

A handwritten signature in black ink that reads "Ronald K. Ward".

Ronald K. Ward  
Director  
Program Accountability and Administration Division

Attachment

## Questions and Answers

### FNS QC Integrity Reviews

**Question 1: How often will the QC integrity reviews occur?**

**Answer 1:** The quality control (QC) integrity management evaluation module will become a regular part of Food and Nutrition Service's (FNS) oversight of State Supplemental Nutrition Assistance Program (SNAP) operations. FNS is working to determine the specifics related to the QC Integrity MEs in FY 2017 and will release that information to States once final decisions have been made regarding State schedules. These reviews will provide an excellent opportunity for continuous improvement and training based on findings and corrective action plans identified and established in FY 2016.

**Question 2: When will the QC management evaluation (ME) guide be available to States?**

**Answer 2:** The ME guide will be available in October 2016.

**Question 3: Will States be given due process to agree or disagree with findings from the FY 2015 QC Integrity reviews? What is the timeframe States have to respond to findings?**

**Answer 3:** Each State will receive a report detailing any findings from their QC integrity review. States will be given at least 30 days to respond in writing to the findings included in the report and 45 days to provide a corrective action plan. FNS will provide a written response to State concerns and to submitted corrective action plans.

**Question 4: How does FNS determine a State introduced biased into its State QC system?**

**Answer 4:** QC integrity reviews assess State processes by reviewing QC and certification case files, conducting interviews with State staff, and reviewing training and other documents States use to inform the QC review process in an effort to ensure that each State agency is conducting the process in a manner that does not compromise the integrity of the data.

**Question 5: Is the timeline for the QC Integrity reviews for FY 2015 in alignment with regulations?**

**Answer 5:** QC is a vital part of SNAP and an essential component of our public stewardship. As a result of concerns about the QC system raised by USDA's Office of the Inspector General and by FNS staff, we feel it is necessary to complete a thorough review of the QC systems in all States before finalizing FY 2015 error rates. These measures meet FNS' responsibility to provide program oversight and are part of a number of initiatives that will continue to improve the integrity of SNAP. We believe the delay in announcing the FY 2015 error rates represents the best balance of FNS' statutory duty to carry out QC and, in light of the serious findings to date of bias, to conduct a thorough review of all States' QC processes.

### **Training and Guidance**

**Question 6: Will FNS (Nationally or regionally) host a conference call or webinar to address State's questions?**

**Answer 6:** FNS will respond to State agency questions regarding the FY 2015 and FY 2016 error rates through a series of Questions and Answers. Regional Offices will collect and forward questions for response so that all States might benefit from the same information. We have offered to work with APHSA to schedule a series of conference calls or webinars to discuss State questions and changes to the FNS 310 Handbook.

**Question 7: Will a draft of the revised 310 Handbook be available for comment prior to implementation?**

**Answer 7:** FNS sought and received input from States along the way and the revised handbook will reflect that input as it supports Federal rules and regulations and strong commitment to program integrity. We appreciate the time and effort of States to provide this initial input and look forward to State comments when the revision is presented at the NAPIPM conference in August, 2016.

**Question 8: What is the National QC training curriculum? Will the curriculum and training be available to State QC staff?**

**Answer 8:** The National QC training curriculum is an internal FNS project to ensure consistent standard processes for conducting QC reviews for Federal QC reviewers. The curriculum is still under development and the plan is to make it available to FNS staff in October 2016. FNS is developing other training initiatives that will be geared towards State QC staff, and may include component parts of the Federal training program.

### One-Tier Review

**Question 9: As recommended in the USDA Office of Inspector General's report, does FNS intend to change the QC process from the current two-tiered approach to a one-tiered process? If so, when will this transition occur?**

**Answer 9:** The USDA Office of the Inspector General's audit report on the QC Process for the SNAP Error Rate recommends that FNS conduct an analysis of changing the QC process to a one-tier process. FNS agreed to conduct a study that will examine the costs, benefits and feasibility of this option. We expect to award a contract to conduct this study in FY 2017.

### Other

**Question 10: The letter received 6/24/16 from Under Secretary Concannon indicated USDA will complete all State agency reviews no later than 12/31/2016, then release updated error rates for FY 2015. What date will the FY 2015 error rates and high performance bonuses be released?**

**Answer 10:** After our comprehensive review of all States, scheduled to be complete by 12/31/2016, USDA will release State and National error rates adjusted in accordance with those reviews. USDA will complete its thorough review of the QC systems in all States before making decisions about the disbursement of payment accuracy bonuses for FY 2013, FY 2014, and FY 2015. Once a decision has been reached, USDA will notify all States of the State and National error rates and the status of the payment accuracy bonuses.

**Question 11: Can FNS provide any details on the new permanent QC staff and what their roles/duties will be?**

**Answer 11:** FNS received additional funding in FY 2016 to support an increase in staff to strengthen Federal training, oversight and monitoring of State QC processes and data to ensure that States are meeting the highest standards of program integrity in administering SNAP. The new permanent QC staff will provide for additional resources to support more thorough reviews of State QC operations to ensure they are conducted in accordance with the regulations and policy. The roles and duties are the same as existing staff, but increase the Agency's ability to ensure reviews are thorough and comprehensive to improve the integrity of the QC system and provide oversight of State QC reviews and provide technical assistance to States as needed.