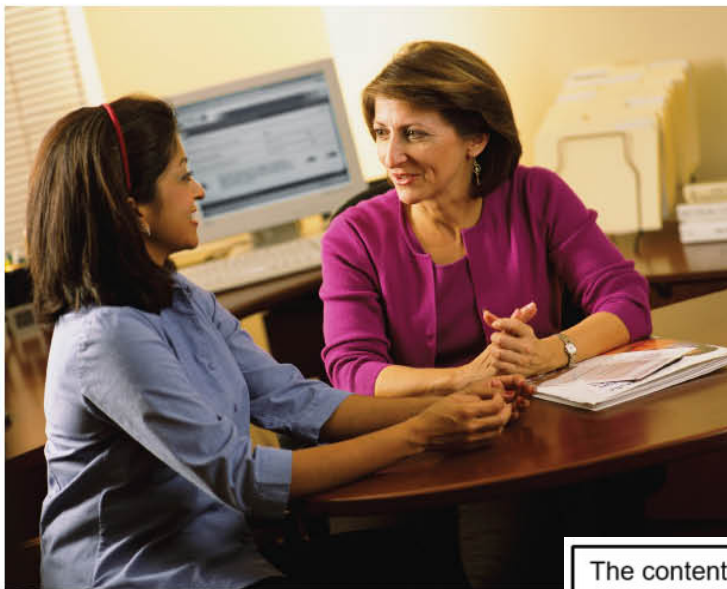




Conducting Program Access Reviews at Local Food Stamp Offices

A Guide for FNS Regional Offices

For Adaptation by State Agencies



Program Development Division
Food Stamp Program
Food and Nutrition Service

The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

**FOOD STAMP PROGRAM
PROGRAM ACCESS REVIEW GUIDE:**

**FOR FNS REGIONAL OFFICES
AND ADAPTATION BY STATE AGENCIES**

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I. INTRODUCTION

PROGRAM ACCESS IS CRITICAL

Access to Food Stamp Program (FSP) benefits by eligible applicants or ongoing participants is one of the highest priorities set by the Food and Nutrition Service (FNS), USDA. Improving program access helps to increase food security among low-income, eligible persons. FNS and State agencies work to improve program access in two ways: first, by informing people about the availability of food assistance through the FSP, and second, by identifying barriers that prevent eligible people from accessing program benefits. This guidance provides information for FNS Regional Offices (FNSROs) and State agencies to monitor program access at local food stamp offices where people apply for and receive food stamp benefits. FNSROs conduct program access reviews at selected local agencies, and State agencies monitor program access during their management evaluation (ME) reviews of local agencies.

WHAT IS A PAR?

A Program Access Review (PAR) examines a local food stamp office's operations to determine compliance with Federal FSP requirements governing access to food stamp benefits by persons applying for or already participating in the program. The review focuses on the application and reapplication process; the areas covered by a PAR are identified in Section III, Summary of Review Topics.

Although program access and civil rights requirements are closely related, this guide does not, for the most part, include civil rights review elements. Some FNSROs incorporate civil rights requirements into their PARs; other FNSROs conduct totally separate reviews, or conduct joint reviews simultaneously at the local agency using different regional staff. FNSROs may continue their current practice with regard to PARs and civil rights reviews. In addition, we have provided a questionnaire that addresses civil rights topics.

To determine compliance with Federal regulations, FNSROs conduct interviews of local office staff, food stamp applicants/participants, and community organizations, review case files, and observe local office operations. FNS Headquarters (FNSHQ) determines the minimum number of PARs that FNSROs must conduct each year.

ABOUT THIS GUIDE ...

This guidance, which updates the original August 2000 guidance, is provided to assist FNSROs in conducting PARs. It is intended that State agencies will adapt this guidance when monitoring the program access portion of the ME reviews of their food stamp project areas (or counties).

Although this revised guidance generally follows the original, there are a number of changes. These include: changes in specific areas of review (some new topics, some expansions, and some deletions), increased guidance in planning and conducting the review aimed especially for new reviewers, and a small increase in the number of required interviews and case file reviews. In addition, this updated guide clearly identifies regulatory requirements associated with program access.

Review tools intended to be used with this guide are included in a supplemental document, "Program Access Review Guide Tools for FNS Regional Offices". Although these review tools were developed carefully to incorporate all of the PAR review elements described in this guidance, use of these review tools is optional. FNSROs and State agencies will need to adapt the tools as necessary to fit the particular circumstances of local offices being reviewed.

II. REVIEW OBJECTIVES

PARs:

- Identify barriers to program access at the local office level;
- Provide technical assistance to State agencies and their local offices to eliminate or minimize the barriers; and
- Promote a partnership with State agencies to further improve program access for food stamp applicants and participants.

III. REVIEW TOPICS

FNS reviews of program access at local offices will focus on the following areas of program operation as they impact getting on or staying on the FSP:

A. Client Services

1. Local Office Operations
2. Availability of food stamp applications
3. Availability of bilingual staff/services/materials
4. Level of caseworker service
5. Program Access Initiatives

B. Application submission and screening

1. Application submission
2. Application screening
3. Online application interface with local office (if applicable)

- C. Application Processing and Case Management (Approvals/ Denials/ Terminations/ Recertifications)
1. Interview procedures
 2. Meeting timeliness standards
 3. Verification requirements and case file documentation
 4. Notices
 5. Interface with TANF, SSI, Medicaid, and Other State Assistance Programs
 6. Work Requirements

IV. SPECIFIC REVIEW ELEMENTS

Following is a listing of specific FSP provisions, or review elements, that are to be reviewed during the PAR. These review elements are grouped under the Review Topics described in part III of this guide. Regulatory citations are provided for review elements with a regulatory base. In some instances, the regulatory requirements have been summarized and combined. Review elements that do not have a regulatory base are expressed as questions. Reviewers will need to adapt if the local office is operating under options permitted by the regulations or operating under an FNS-approved waiver. Depending on the review element, there may be an optimal method to determine compliance, or there may be multiple ways of determining compliance. To assist reviewers, recommended review methods are noted using this key:

Key for Recommended Review Methods:

O = observation

I = interview

C = case file review

W = website review

A. CLIENT SERVICES

1. Local Office Operations

- a. Food stamp applicants are not subject to additional application or application processing requirements beyond the Food Stamp Act of 1977, as amended, Federal regulations or FNS-approved waivers. (I, O, C) 7 CFR 273.2(a)(1)
- b. The hours of operation and location of the local office serve households including those with special needs as applicable.
 - Elderly and/or disabled households
 - Homeless households
 - Non-English speaking households
 - Working households
 - Households in rural areas or located on reservations (I, O, C, W) 7 CFR 273.2(a)(1)

2. Availability of Applications

- a. Applications are freely available to potentially eligible clients and to anyone who asks for one. (I, O) 7 CFR 273.2(c)(3)
- b. Applications are mailed to households on the same day they contact the food stamp office by phone or letter. (I, O) 7 CFR 273.2(c)(2)(i)

3. Availability of Bilingual Staff/Services/Materials 7 CFR 272.4(b)

If required for the project area in which the local office is located, informational materials, staff/interpreters, and certification materials are provided by the local office in the appropriate languages. (I, O, C)

4. Level of Caseworker Services

- a. Case workers are generally able to handle FSP responsibilities for the cases assigned to them on a timely basis. (I, C)
- b. Complaints that have been made by clients or advocates concerning poor customer service by case workers are resolved. (I, C)
- c. The local office is responsive to clients when they need to communicate information or ask questions related to their application or case. (I)

5. Local Office Program Access Initiatives

- a. Have any practices been initiated that have led to improved program access for applicants/clients? Describe any new practices and the problems or barriers the practices are designed to address.
- b. Were the improvements initiated by the State agency or local agency?

- c. Does the local office participate in any meetings with advocates or community organizations to discuss program access? Describe the meetings – dates, participants, outcomes.

B. APPLICATION SUBMISSION AND SCREENING

1. Application Submission

- a. The local agency accepts applications submitted in person, through an authorized representative, by fax, by other electronic transmission, by mail, or online (if available). (I, O, C) 7 CFR 273.2(c)(1)
- b. The local agency documents the date an application is received. (I, O, C) 7 CFR 273.2(c)(1)
- c. Households are permitted to file an application on the same day they contact the food stamp office during office hours. The local agency begins processing the application upon receipt of an application (paper or digital) that contains a name, address, and signature. (I, O, C) 7 CFR 273.2(c)(1) and 273.2(c)(3)
- d. The local agency posts a notice of 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. (O) 7 CFR 273.2(c)(4)
- e. If a household withdraws its application, the local office:
 - Confirms the withdrawal and record in the case file the withdrawal and the reason if provided by the household;
 - Advises the household of the right to reapply at any time; and
 - Provides assistance in completing verification if the household cooperated but failed to provide required documents. (I, C) 7 CFR 273.2(c)(6)

2. Application Screening

- a. Applicants are screened for eligibility for expedited service at the time assistance is requested. (I, O, C) 7 CFR 273.2(a)(2), 273.2(i)(1) and (i)(2)
- b. Households are informed that they can apply without an interview. (I, O) 7 CFR 273.2(c)(1)
- c. 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. (I, O) 7 CFR 273.2(c)(1)

- d. Households are encouraged to apply when they first contact the office requesting food assistance or expressing concern about food insecurity. (I,O) 7 CFR 273.2(c)(2)(i)
 - e. Households are informed that receiving food stamps does not affect other programs' time limits. (O, I) 7 CFR 273.2(c)(2)(i)
 - f. If a person contacts the wrong food stamp office, the local office gives the correct the address and phone number. (See also Notices) (I, O)7 CFR 273.2(c)(2)(ii)
 - g. If a person submits an application with sufficient information (i.e., name, address, and signature) to the wrong office, the local office offers to send the application to the correct office so that it will arrive the same day or the next day. The local office tells the applicant that application processing begins when the application arrives at the correct office. (See also Notices) (I, O, C) 7 CFR 273.2(c)(2)(ii)
3. Online Application Interface with Local Office (If applicable)
- a. When applying online, do applicants experience any barriers or delays as a result of any activities, processes, systems, or procedures occurring at the local office? (I, W)
 - b. What assistance, if any does the local office provide applicants, including those who are visually-impaired and those with limited English proficiency (LEP), who use the online application? (I, W)

C. APPLICATION PROCESSING AND CASE MANAGEMENT (APPLICATIONS, RECERTIFICATIONS, DENIALS, and TERMINATIONS)

1. Interview procedures

- a. An interview is scheduled if a household cannot be interviewed on the same day the application is submitted. (I, O, C) 7 CFR 273.2(e)(2)
- b. When scheduling an interview, the local office:
 - Explains that the interview can be conducted by phone if the household has a hardship and is unable to come into the office (based on State agency policy);
 - Exempts households from face-to-face interviews on a case-by-case basis and documents the reason for the exemption in the case file;
 - Grants a face-to-face interview if requested by the applicant;
 - Schedules interviews to accommodate applicants with special needs, including those who work or need translator/interpreter services, to the extent possible; and

- Schedules interviews so that eligible households may participate within 30 days of the application filing date. (I, O, C) 7 CFR 273.2(e)(2) and (e)(3)
- c. When conducting an interview, the local office:
- Conducts the interview as an official discussion of the household's circumstances, ensuring the privacy and confidentiality of the interview and resolving any unclear or incomplete information;
 - Advises households of their rights and responsibilities, including appropriate application processing standards and responsibility for reporting changes;
 - Permits the household to bring another person to the interview (or authorizes a representative for that purpose in writing and documents the case file with this information); and
 - Advises households that receipt of food stamp benefits is not affected by PA requirements, such as time limits for participation. (I,O, C) 7 CFR 273.2(e)(1)
- d. If a household misses the interview, the local office:
- Sends a notice of missed interview (NOMI) to the household that explains that the household is responsible for rescheduling the interview; and
 - Schedules a second interview during the 30-day application processing period if requested by the household and prorates benefits to the date of application if the household is determined eligible based on the application and rescheduled interview. (C, I) 7 CFR 273.2(e)(3)

2. Federal Application Timeliness Standards:

- a. Benefits are provided by the 7th day following the application filing date for households eligible for expedited service. (C) 7 CFR 273.2(i)(3)(i), (ii)
- b. For all other eligible households who do not qualify for expedited service, benefits are provided by the 30th day following the application date. (C) 7 CFR 273.2(g)(1)
- c. If the State or local office causes a delay in certifying an eligible household, the household notified of the delay and told what action the household must take to receive benefits. (See also Notices) (C) 7 CFR 273.2(h)(3)(i)
- d. If determined eligible during the second 30-day period, the household is certified back to the month of application for agency-caused delays. (C, I) 7 CFR 273.2(h)(3)(ii)
- e. When eligibility is not determined by the 60th day after application filing and the household is determined eligible to receive benefits, households are:

- Certified back to the month of application if the State/local office causes the delay;
- Certified back to the month following the application month if the delay is shared by the household and the State/local agency; and
- Notified of the actions the State/local office is taking when eligibility cannot be determined. (See also Notices) (C, I) 7 CFR 273.2(h)(4)(ii)

3. Verification

- a. For households entitled to expedited service, the local office:
 - Verifies the applicant's identity; and
 - Postpones other required verification if necessary to meet the 7-day expedited processing requirement. (C, I) 7 CFR 273.2(i)(4)(i)(A), (B)
- b. Households have at least 10 days to provide verification; they are told when the verification is due and what time period the verification covers, and they are given examples of acceptable documentation. (C, I) 7 CFR 273.2(c)(5) and 273.2(f) (See also Notices)
- c. Regarding verification of social security numbers (SSNs), the State agency/local office:
 - Submits the household SSNs to the Social Security Administration (SSA) based on SSA procedures;
 - Issues benefits on time even if the SSNs of an otherwise eligible household have not been verified;
 - Permanently annotates the case file with verified SSNs, so verification is not required again; and
 - Requires households to provide their SSN, rather than requiring households to show their SSN cards. (C, I) 7 CFR 273.2(f)(1)(vi)
- d. The local office accepts documents that reasonably establish residency and identity. (Specific documents, such as birth certificates to verify identity, are not required for food stamp purposes.) (C, I) 7 CFR 273.2(f)(1)(vi), (vii)
- e. The local agency assists cooperating households obtain verification. Households are not required to present verification in person. (C, I) 7 CFR 273.3(f)(5)(i)
- f. If finger imaging is required by the State agency, is the local agency applying the procedure correctly based on the FNS-approved waiver?

4. Notices

The local agency correctly issues appropriate notices to households when required on a timely basis. (I, C)

Depending on household circumstances, the following notices are typically found in the case file (paper or electronic):

a. Notice of Eligibility (for normal 30-day processed applications) 7 CFR 273.10(g)(1)(i)(A)

The notice must:

- Identify the amount of allotment;
- Explain the benefit amount if the notice covers more than one month;
- Identify the beginning and ending of the certification period;
- Explain fair hearing rights;
- Provide the name of the case worker to contact and the telephone number of the food stamp office;
- If available, identify the organization that provides free legal services; and
- Be provided no later than 30 days after the date of initial application.

b. Notice of Eligibility (for applications processed under expedited service) 7 CFR 273.10(g)(1)(i)(A), (B)

The notice must:

- Explain that the household must provide verification;
- Explain certification periods and consequences of failure to provide verification; and
- Be issued within 7 days.

c. Notice of Denial 7 CFR 273.2(g)(3), (h)(2)(i)(A),(B), 273.10(g)(1)(ii), (g)(2)
The notice must:

- Explain the reason for the denial;
- Provide the telephone number of the food stamp office;
- Explain the household's right to request a fair hearing;
- If available, identify the organization that provides free legal services; and
- Be sent not later than 30 days from the application filing date.

d. Notice of Pending Status 7 CFR 273.2(h)(2)(i)(A), (B), 273.10(g)(1)(iii)
(Note: this is an optional notice that State agencies may use in lieu of a Notice of Denial.)

The notice must:

- Inform the household that its application has not been completed and is still being processed;
- Explain what action the household must take and that its application will be denied if the household fails to take the required action by a specific date, which, based on State option, could be within 60 days of the date the application was filed or 30 days following the date verification was first requested; and
- Be sent 30 days after the application filing date.

e. Notice of Required Verification 7 CFR 273.2(c)(5) and 273.14(b)(4): The notice must:

- Inform the household of the verification requirements the household must meet;
- Be written in clear and simple language;
- Meet LEP requirements;
- Explain the period of time the verifications should cover;
- Provide a due date and examples of the types of documents that would be acceptable;
- Explain the State agency's responsibility to help the household obtain required verification if the household is cooperating; and
- Be provided at the time of application and recertification.

f. Notice of Missed Interview 7 CFR 273.2(e)(3) and (h)(1)(i)(D), 273.14(b)(3)(iii) At application, the notice must:

- Inform applicants that they missed their scheduled interview and that they are responsible for contacting the local office to reschedule the interview; and
- Be sent prior to the Notice of Denial.

At reapplication, the notice must:

- Inform applicants that they missed their scheduled interview and that they are responsible for contacting the local office to reschedule the interview; and
- May be combined with the Notice of Denial.

g. Notice of Adverse Action 7 CFR 273.12(c)(2)(i), (c)(3)(ii), (c)(3)(iii), (f)(3)(i)(A), 273.13(a)

The notice must:

- Explain the proposed action and the reason for the action;
- Provide a toll-free telephone number and, if possible, the name of a contact;
- Explain the fair hearing process, the continuation of benefits at the higher level if a fair hearing is requested, and the liability for overissuances if the fair hearing decision upholds the State agency;
- The availability of free legal representation, if available; and
- Be sent at least 10 days prior to the proposed action.

h. Notice of Expiration 7 CFR 273.14(b)

The notice must:

- Be sent before the first day of the last month of the certification period;
- Provide the date the certification period expires;

- Provide the date by which the household must reapply in order to receive uninterrupted benefits;
- Explain the consequences of failure to apply for recertification in a timely manner.

i. Notice of Termination 7 CFR 273.21(m)(2)

(Note: this is for households subject to monthly reporting and retrospective budgeting.) The notice must:

- Explain the proposed action and the reason for the action;
- Provide a toll-free telephone number and, if possible, the name of a contact;
- Explain the fair hearing process, the availability of continued benefits if a fair hearing is requested, and the liability for over issuances if the fair hearing decision upholds the State agency;
- Explain how benefits may be reinstated if this option is available; and
- Be received by the household no later than the date benefits would be issued.

5. Interface with TANF, Medicaid, and Other State Assistance Programs

- a. Households applying for TANF are notified of their right to apply for food stamps at the same time. (I, C) 7 CFR 273.2(j)
- b. Except for categorically eligible households, applications for food stamps processed based on FSP criteria. (C, I) 7 CFR 273.2(j)
- c. If TANF redetermination is untimely, categorical eligibility for food stamp benefits assumed. (C, I) 7 CFR 273.2(j)(2)(iv)
- d. For purposes of work registration, FSP exemptions applied to individuals in categorically eligible households. (C,I) 7 CFR 273.2(j)(2)(x)
- e. For households applying simultaneously for SSI and food stamps, food stamp eligibility is treated as NPA until categorical eligibility has been determined. (C, I) 7 CFR 273.2(k)
- f. If the State agency opts to apply a TANF (or other means-tested program) sanction to a TANF/FSP household, the sanction is extended only to the individual who violated the TANF (or other means-tested program) requirement and not the entire food stamp household. (I, C) 7 CFR 273.11(k)(5)

6. Work Requirements

- a. Food stamp work exemptions are applied correctly to household members subject to the food stamp rules and the State's Food Stamp Employment and Training (FSET) plan for work requirements: (C) 7 CFR 273.7(b)
- b. The local office adheres to the policy and disqualification levels outlined in the State's disqualification plan. (I, C) 7 CFR 273.7(f)(4)
- c. The local office complies with good cause policy of 7 CFR 273.7(i) when determining whether a food stamp participant did not comply with work requirements.
- d. The Notice of Adverse Action explains how the disqualified participant may be reinstated after the sanction period is over. (C) 7 CFR 273.7(f)(1)(ii)
- e. Does the local office offer work registration or are applicants required to go to a separate location?

V. PLANNING THE REVIEW

A. SELECTING STATES

There are many factors that go into deciding which States to conduct a PAR in any given year. This is particularly true for FNSROs that coordinate PARs with their biennial ME review schedules and annual State Agency Operations Review (SAOR) schedules in order to maximize limited travel and staff resources.

B. SELECTING PROJECT AREAS (COUNTIES)

Once the States are chosen, consider information received from a variety of sources in selecting project areas to review, including:

- State agency
- Advocates/community organizations (check with FNSRO Public Information office for organizations if not known to review team)
- State Quality control (QC) data: timeliness, negatives, payments accuracy
- Complaints received (including Civil Rights complaints)
- Fair hearing information
- Findings from recent reviews and audits, including Federal QC reviews, Civil Rights reviews, or the State ME review
- Information from the news media concerning the FSP or other public assistance programs (check with FNSRO Public Information office)

- Data on estimated unserved potentially eligible households (see discussion on Data Mining, paragraph C3 in this section)
- Migrant farmworker organizations for areas in the migrant stream (if applicable to the State where the review is to take place)

C. SELECTING LOCAL OFFICES

1. Factors to Consider

Depending on the size of the project area selected for review, there may be several local offices from which to choose for conducting the PAR. The research used to identify the project area may also provide information that point to a particular office within the project area to review. For example, data may reveal local office variation in error rates, complaints received, and staff to client ratios. In general, select local offices that have the greatest potential impact on participation or that have known or potential program access problems.

2. Call Centers

Increasingly, States are adopting technologically advanced solutions to benefit determination and caseload management of public assistance programs. Use of call centers is one of the forms that food stamp modernization is taking. States with call centers have one or more locations where participants, applicants, or interested persons may call toll-free to ask general or specific program questions or to report changes to ongoing cases. Depending on the State organization, it may be appropriate to select a call center for a PAR. More often, however, FNSROs should plan to review the selected local office's interface with the call center. Additional questions have been added to questionnaires in the supplemental document "Program Access Review Guide Tools for FNS Regional Offices" that examine the interaction of clients, the selected local office staff, and the call center for compliance with food stamp program access requirements. A call center log has also been added as a new review tool.

3. Data Mining

Data mining is a technique using computer software programs that permits selection based on identified criteria for which comparative data is available. Depending on the information that is available at the county or sub-county level and the software available to the FNSRO, data mining could be a significant help in selecting local offices to review for the PAR. There are three methods that are easily available to the FNSRO that can be used to select local offices for a PAR. These methods, as described below, are provided as an option for the FNSRO to consider. The FNSRO may use these methods separately or together or utilize other methods of data mining appropriate to selecting local offices for review.

- Find local offices in counties or urban areas with low FSP participation rates;
- Find counties with significantly higher negative error rates than their State average; or
- Find counties with a high ratio of negative actions to active Food Stamp households.

Data Mining Protocols located in Review Tool 2 provide optional methodologies for selecting local offices (2A) and case files (2B). Census Bureau data and food stamp quality control (QC) data can be “mined” for local office selection. The Census Bureau data includes Public Use Microdata Areas (PUMA), which represent geographic units of 100,000 to 200,000 persons. More information about PUMA can be found on the Census Bureau’s website at www.census.gov. For the case file sample selection, data fields from the State agency or local agency automated case file system are “mined” to identify cases for review. The software required to utilize these methods include ACL, (a software package commonly used by auditors), and Microsoft Excel and Access. It is recommended that reviewers work with the FNSRO Statistician to utilize these data mining procedures.

D. PREPARING FOR THE REVIEW

Thorough preparation is critical to ensuring a successful PAR. Following are preparatory steps that the FNSRO review team should take prior to the review.

1. Review State-specific program policy and procedures.

Examples of State-specific program information that should be reviewed in advance include:

- FSP certification policy waiver data base (available from FNSHQ or the FNS website)
- FNS State Options Report
- Demonstration projects (available from FNSHQ)
- State plans for CAP, outreach, disqualification, and Food Stamp Employment and Training (FSET)
- State food stamp certification policy manual
- Program information available from State-level website and toll-free telephone numbers

2. Adapt questionnaires and other PAR materials if necessary to accommodate State-specific food stamp policy or procedures.

3. Determine criteria to use in selecting case files for review at the local office.

If the option is available, consider using data mining to identify cases with specific circumstances to be reviewed. Once a local office has been selected for a PAR, data mining techniques can assist in selecting the most

appropriate case records for that review. The criteria for what is most appropriate may vary from one review to the next. In general, however, the objective of the case file review is to determine whether the local office is in compliance with FSP policy and procedures for approving, denying, and terminating initial and subsequent applications. Data mining can help to find those records that will produce the most meaningful analysis. Following is a general explanation of the steps the FNSRO would use when employing data mining techniques to select case files for review:

First, the FNSRO should identify the data fields of interest, in order to analyze the data prior to the site visit and make the appropriate case selections using a random sampling function that is part of any data mining software package.

Second, when the data have been received at the FNSRO, it should be checked for duplicates, counted and merged if necessary into a single data file from which the records to be reviewed will be randomly sampled. Statistics should be generated on all meaningful data fields.

Third, a sampling method is chosen to generate the samples for detailed review, based on these statistics and the priorities of the PAR. There are several sampling methods that can be used, including simple random sampling and stratified sampling. In stratified sampling, one or more variables are identified as being important in the review process, and the reviewing team wants to insure that the cases they see cover all or at least most values of this variable.

4. Provide formal notification to the State agency of the upcoming review. Relevant information about the review, such as the county and offices selected, dates of the review, purpose of the review, and identification of the FNS review team should be communicated in writing to the State well in advance of the review. As discussed below, other more specific information can be provided in this letter, a second letter, or communicated via telephone conference call.
5. Request specific information from the State/local office. Obtain as much information about the local office as possible prior to the review. This will save time during the on-site portion of the review. This information can be gathered during the telephone entrance conference or during another conference call prior to the field work. A Local Office Survey (Review Tool 1) is provided in the PAR Guide Review Tool Supplement. The information to be gathered includes:
 - a. Logistics –office name, address, phone number, office hours, staff contact, organizational chart, work station space for review, computer access, etc.

- b. Program information – modernization efforts including interface with online applications and call centers, office functions, caseload information, recent reviews, recent staff training, etc.
- c. A sample of cases for review, including recent approvals, denials, terminations, and cases due for recertification to be pulled for the review. The sample month for case file selection should be at least three months prior to the month in which the on-site review occurs. This will give the local office at least 60 days to act on initial applications. (If using data mining to identify cases with specific circumstances, explain the procedures during the phone call or in written correspondence.)

VI. CONDUCTING THE REVIEW: OFF-SITE ACTIVITIES

Following are some review activities that can be completed off-site before traveling to the local office to conduct the on-site portion of the review:

A. Conduct Entrance and Exit Conferences via Telephone Conferences

Conduct the entrance and/or exit conferences and the Local Office Survey via telephone (or computer video if equipment is available). This allows all parties (State, local, and FNS) to be present on the calls. In addition, by conducting the exit conference after the field work is completed allows the review team to sort out their notes and complete analysis of the data. It's good to remain flexible, however, should it be necessary to conduct informal face-to-face meetings at the beginning and end of the field work. For specific information to convey and to request, see the discussion in the previous section, Planning the Review.

B. Review Local Level Client Service via Telephone

Call the local office anonymously to determine level of customer service, availability of public transportation and translation services for languages other than English or hearing-impaired. If possible, enlist the help of a bilingual staff person to make separate calls in English and Spanish (or other language appropriate to the local review area) to compare the information provided in both languages. Review Tool 3A provides a format for recording information about the local level telephone services.

If clients of the project area are able to utilize a call center for client services, conduct an anonymous review of the call center by posing as a person who wants to apply for food stamps. Test the call center's customer service for LEP and hearing-impaired callers. A format located in Review Tool 3C can be used to record information gathered about the types of services available

through the call center and how the local level call center interfaces with the statewide call center.

C. Conduct interviews

Interviews of advocates/community organizations can be completed by phone prior to the review. Also, some client interviews can be completed by phone once the case file review sample has been received. Clients that are part of the case file recertified sample and were recertified by telephone interviews or clients that failed to complete the recertification process would be good candidates for program access telephone interviews. Finally, it may be appropriate to conduct some or all of the interviews with food stamp staff over the phone. Follow-up questions can be asked on-site at the local offices to confirm information.

VII. CONDUCTING THE REVIEW: ON-SITE ACTIVITIES

The on-site review activities include the following:

- Entrance Conference
- Observations of Local Office Functions
- Review of Online Application and Call Center Interface
- Interviews of staff, clients, and grass-roots organizations
- Review of Case Files
- Exit Conference

A. ENTRANCE CONFERENCE

If the entrance conference was not already conducted by telephone prior to arriving at the local office, meet with the local office staff and State agency staff (if available) when arriving at the local office. This provides an excellent opportunity to meet the people who will be working with the review team during the review and also provides an opportunity to explain to the staff why and how the team is conducting the reviews.

B. OBSERVATIONS

1. Purpose of Observations

The purpose of observing certain local office functions as part of the review is to see first hand how the office works. The information obtained from observations will help the reviewer to learn how the client service operations flow and allow the reviewer to compare the observations with the information received from the staff interviews. Review Tool 4 may be used to record observations.

2. What To Observe

a. Physical Environment

- Office location – note accessibility and whether public transportation is available
- Building – note accessibility for elderly and disabled persons including the registration counter, worker offices, finger imaging site, and other areas that applicants must use, the availability of public restrooms, etc.
- Waiting rooms –whether the following is posted:
 - Nondiscrimination poster, “And Justice for All”, 7 CFR 272.6(f); and
 - An explanation of the FSP application processing standards and the right to file an application on the date of initial contact. 7 CFR 273.2(c)(4)
- Privacy requirements for interviews including computer kiosks, or designated telephones for online application or making phone calls to a call center
- Whether the flow of office organization presents barriers to applying for benefits

b. Processes

- Steps an applicant must take to apply for food stamps or drop off applications or documents.

- Receptionist functions – are customers treated respectfully and provided clear instructions?
- Screening functions – what information is provided to applicants and does it reflect correct policy?

c. Materials

- Note the availability of the following information and if available whether the information contains the correct non-discrimination statement:
 - Food stamp applications;
 - Other food stamp information; and
 - Information about other programs/services for the food stamp population.

C. LOCAL OFFICE ONLINE APPLICATION PROCESSING

If applicants have the option to apply via the internet, review the process as it interfaces with the local office. This is not intended to be a review of the online application itself for compliance with regulations; rather, it is intended to be a guide to determine if any barriers or delays for customers exist as a result of any activities, processes, systems, or procedures at this office. Questions to be answered about local office interface with online applications are located in Review Tool 5.

B. INTERVIEWS

Interviews of food stamp staff, clients, and advocates/community organizations are an important part of a program access review. The purpose of conducting these interviews is to learn first hand about program access issues at the local office. Review Tools 6A-6E are questionnaires that may be used to conduct interviews.

1. Staff Interviews

a. Interview Results

Interviews highlight how food stamp staff understand and apply rules and how various functions related to the food stamp application process are implemented. The interview process will help to:

- Determine the local agency process/procedures used to accommodate, certify, and process applicant/households;
- Provide an explanation of the system used to track the number of applications filed and number of cases processed as expedited; and
- Determine if a certain worker does not understand a particular rule or procedure.

b. Interview Approach

In conducting interview, 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.

c. Minimum Requirements

A minimum of 5 local office staff (depending on the size of the office) should be interviewed to help determine if the local office is in compliance with Federal regulations for program access. The following staff should be interviewed:

- Local Office FSP Director/Manager (1)
- Food Stamp Eligibility Supervisor (1)
- Eligibility Workers (2) – Depending on the office organization, include both intake and ongoing workers, or both non-public assistance (NPA) and public assistance (PA) case workers.
- Receptionist/Screenener (1)

2. Clients

a. Conditions for Conducting Interviews

Interviews should be conducted away from the waiting area, if possible, to protect client confidentiality. Randomly select clients, choosing a mix

of new applicants and ongoing participants, if possible. As previously discussed, it may be possible to interview some clients over the phone prior to the on-site review.

b. Minimum Requirements

A minimum of 6 clients (depending on the size of the office) should be interviewed to learn about the types of experiences they have had as applicants and recipients at the local office.

3. Advocates/Community Organizations

a. Types of organizations to Interview

The first organization to interview is the legal aid organization that is listed on the Notice of Adverse Action used at the local agency. Other recommended choices include organizations that serve the non-English speaking community, homeless, migrant farm worker, battered women and children communities, or local food banks and soup kitchens.

b. How to Identify Advocates/Community Organizations

Advocate groups may be identified by: State FSP Directors; State Civil Rights Directors; FNSRO Directors of Civil Rights and Public Affairs; listings in local phone book; on the Internet; legal aid agencies; food banks; immigration or civil rights agencies; and FNS field offices located in the State. Advocate groups will likely provide information on the areas of the FSP they perceive as problems or information on areas that are noteworthy from a community standpoint.

c. Minimum Requirements

A minimum of 3 community organizations or advocate organizers should be interviewed. As previously discussed, these interviews may be conducted by telephone from the regional office prior to the on-site review.

D. CASE FILE REVIEWS

1. Purpose of the Case File Reviews

Reviewing case files provides a check against the information provided by staff during the interviews and is a critical component of the PAR.

Although the minimum number of cases to be reviewed (as discussed below) is not large enough to yield statistically valid findings, enough cases are reviewed to give a clear indication of the local office compliance in meeting basic application processing requirements.

2. Minimum Requirements

A total of 75 - 80 case files are required to be examined during the review. The following types of case actions should be reviewed in approximately equal number:

- Initial approvals
- Denials
- Terminations
- Cases due for recertification (*new*)

3. Sample Selection

a. Requirements

- Cases must be selected randomly by regional office staff and include a combination of NPA and PA cases.
- State agency staff should not be involved in the selection of cases, although they may assist in the case file review.
- Case action under review should have occurred three months prior to the review month (E.g., for a review conducted in March, the sample month would be action in December for approvals, denials, terminations, and notices of expiration).

b. Options

- Data Mining Approach to Sample Selection. As discussed in the previous section on Planning the Review, cases may be selected using data mining methods, which enables the regional office to pick case files with specific characteristics. Specific instructions for selecting case files using a data mining approach may be found in Review Tool 2B in the PAR Guide Review Tool Supplement.
- Additional Case File Reviews. If time permits, FNSROs are encouraged to review more cases particularly for very large local offices.

- Oversampling. Some cases selected will not be acceptable for review for a number of reasons including household has moved out of the project area, duplicate applications were submitted by a household, etc. To address this possibility, an additional 5 cases for each case file action (initial approvals, denials, terminations, recertifications) will compensate for the need to drop some selected cases.

4. Program Requirements to Review

The review team should record case file information on the case file worksheet (Review Tool 7A for initial application actions and/or Review Tool 7B for reapplications) or a similar worksheet used by the Regional Office. Note whether each case reviewed is correct or in error.

a. Initial Applications

Review these cases to determine compliance with program requirements for application screening for expedited service and processing requirements, timeliness of eligibility determinations, notices, interviews, verification, case file documentation, and work requirements. Note whether benefits were correctly prorated.

b. Denials

Review these cases for compliance with program requirements for application screening for expedited service and processing, timeliness of eligibility determinations, notices, interviews, verification, case file documentation, and work requirements. Note whether the denials were correct and whether food stamp determinations were independent of any other program's case actions.

c. Terminations

Review these cases to determine if the basis for the termination as stated on the Notice of Adverse Action was correct, if the household was sent a correct and timely notice, and if the termination was effective within the State's timeframes. If the household was terminated for failure to provide verification, ensure that the household was informed of the verification required to be submitted.

d. Recertifications

Pull a sample of households that were sent a Notice of Expiration in the sample month. Half of the sample should be households that were recertified and the other half should consist of households that were not recertified. Review these cases for compliance with program requirements for application processing, notices, interviews, verification, case file documentation, and work requirements. Note whether the eligibility redeterminations were correctly made and whether food stamp determinations were independent of any other program's case actions. Consider calling some households that did not file a recertification application or whose recertification was denied as part of the client interviews. This can provide insight to access barriers at recertification.

E. EXIT CONFERENCE

The exit conference provides an opportunity to close the review with the local office staff. At the conclusion of the review, a general discussion of the overall findings should be held with the local agency administrator/manager. This may also be an appropriate time to discuss specific findings from the case file review. Consider giving the local office an opportunity to find missing documents or to respond to individual case findings prior to releasing the report. This will reduce the number of challenges to the report and give the agency a head start in correcting allotments. Inform the manager that a formal report will be issued to the State agency. The case file findings should be included in the final report transmitted to the State.

VIII. REPORTING THE FINDINGS

A. PURPOSE OF THE REVIEW REPORT

The review report compiles findings, recommendations, required corrective actions into one report for the State.

B. RECOMMENDED REPORT CONTENT

The report should include the following:

1. Introduction— provide basic information (who, what, when) about the review including:
 - Dates, times, and locations;

- Identification of FNS reviewers and local office staff involved in the review;
 - 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 local office 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 local agency/State agency must take to correct each finding; and
 - Recommendations – describe aspects of the local office operations that could be taken to promote program access and improve customer service.
4. State Agency Response – specify the date by which the State agency must respond to all findings (no more than 60 days from the date of the report).

IX. FOLLOW-UP

Depending on the extent of the review findings, follow-up may be easy or protracted. The State agency is required to provide corrective action by the due date required by the FNSRO, as stated in the review report. If the report is not received within the required timeframe, FNSROs will need to follow-up with the State agency.

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 State

agency in writing and request additional information. When the corrective action is considered adequate, FNSROs may close out the report.

X. TIMELINE

Following is a recommended timeline for review activities.

Suggested Timeframes for Planning and Conducting Food Stamp PARs

Activity	When to do
Develop Review Schedule for FSP reviews, including PARs, for upcoming FY (States/Dates)	July -August
Use data mining and other methods to identify project areas for PARs in upcoming FY	July-August
Contact State agency and arrange for mutually agreeable review date for each project area	90 days before review
Send formal notification letter to State agency and reserve hotel and GSA vehicle (if applicable)	90 days before review
Modify review materials to accommodate State-specific information as needed	60-90 days before review
Follow-up if State agency has not provided data needed pulling case file samples	45 days before review
Select case samples. Access State computer system to print needed screens (case comments, expedited, notices, issuance date)	30 days before review
Schedule entrance and exit conferences with local office, and request that lists of cases needed for case file review be provided to the FNSRO 15 days before review. Conduct the Local Office Survey.	30 days before review
Conduct interviews advocates/community groups, including legal organization named on notice of adverse action	30 days before review

Suggested Timeframes for Planning and Conducting Food Stamp PARs	
Activity	When to do
Conduct anonymous calls to local office, hotline and change center (if applicable)	30 days before review
Check State website for info related to project area	30 days before review
Conduct telephone interviews for clients from the recertification list (if state has waiver for phone interviews at recertification)	15 days before review
Prepare review packet: income chart, state profile, waivers list, state options and discuss with team	15 days before review
Email sample lists to project area contact	15 days before review
Conduct entrance conference by telephone or at the local office	5 days before review or First day of review
Conduct field work: <ul style="list-style-type: none"> • interview staff and clients • observe local office • review case files 	3-5 days at local office
Conduct exit conference: <ul style="list-style-type: none"> • at Local Office or • by telephone 	Last day of review or Within 5 days after review
Give project area time to refute missing notices, timeliness and other issues discussed at exit conference	10 days after exit conference
Write report	Draft due 30 days after review
Report is signed and released to state, asking for a response with CAP within 60 days.	60 days after review
Distribute report to FNSHQ	60 days after review
Follow up with State agency if CAP not received	65 days after release of report
Examine proposed CAP and either close out report or request additional response	30 days after State's response with corrective action plan is received

XI. GLOSSARY OF ACRONYMS

ACL	ACL Services Ltd. (providing audit analysis software)
CAP	Corrective Action Plan
FSA	Food Stamp Act of 1977
FNA	Food and Nutrition Act of 2008
FNS	Food and Nutrition Service
FNSHQ	FNS Headquarters
FNSRO	FNS Regional Office
FSET	Food Stamp Employment and Training
FSP	Food Stamp Program
GSA	General Services Administration
LEP	Limited English Proficiency
ME	Management Evaluation
NOMI	Notice of Missed Interview
NPA	Non-public assistance
PA	Public assistance
PAR	Program Access Review
PUMA	Public Use Microdata Areas
QC	Quality control
SAOR	State Agency Operations Review
SNAP	Supplemental Nutrition Assistance Program
SSA	Social Security Administration
SSI	Supplemental Security Income
SSN	Social Security Number
TANF	Temporary Assistance for Needy Families
USDA	United States Department of Agriculture