



Food and Nutrition Service

Park Office Center

3101 Park Center Drive

Alexandria VA, 22302

Date: August 30, 2019

Subject: Supplemental Nutrition Assistance Program (SNAP) – Fiscal Year 2020 Federal Management Evaluation Target Areas—REVISED*

To: Regional Administrators
Supplemental Nutrition Assistance Program Directors
All Regions

Fiscal Year 2020 Federal SNAP Management Evaluation Target Areas

The Food and Nutrition Service (FNS) is targeting the SNAP Management Evaluations (MEs) listed in the table below for Fiscal Year (FY) 2020. The FNS National Office selected these target areas in consultation with the FNS Regional Offices (ROs). The ROs must follow the standardized ME review guides to address the Target Areas in applicable States in the fiscal year.

Federal Target Area:	Applies to:
Quality Control (QC) Integrity Review	At least one State per region
The Reporting Module of the Program Access Review	Three States per region (excluding those reviewed in this area in FY 2019)*
Employment and Training (E&T) Program Review	All States operating mandatory E&T programs
Able-Bodied Adults without Dependents (ABAWD) Review	All States with Statewide ABAWD waivers as of July 1, 2019 (AK, DC, GU, LA, NM, and VI)

* FNS National Office initially issued the SNAP FY 2020 Federal ME Target Areas memo on June 28, 2019. That memo targeted all States (excluding those reviewed in this area in FY 2019) for the Reporting Module of the Program Access Review. This revised memo adjusts that target down to three States per region, in order to reallocate a portion of RO staff to the anticipated FY 2020 payment accuracy technical assistance activities. There are no other revisions.

<p>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.</p>
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At-Risk Areas and Minimum Review Cycles

In addition to conducting MEs for the target areas listed above, the ROs have discretion to conduct MEs in States that they find to be at-risk in a particular functional area. In general, the ROs should evaluate whether a State is at-risk based on factors such as caseload size, known or suspected deficiencies, QC error rates, recent policy changes, new system implementation, or systems changes that affect the functional area. For the ABAWD area, the ROs should also consider particular risk factors such as waiver status change and the implementation of a new eligibility system or ABAWD tracking system. For the E&T area, the ROs should consider particular risk factors such as the implementation of a new eligibility system or E&T MIS system, an E&T budget in excess of \$15 million.

Absent a State being found at-risk for the fiscal year, the ROs must conduct MEs in each State as regularly as required by the minimum review cycle as shown in the following table. Please note that the PAR Guides (Local and State) are under revision. A minimum review cycle will be determined for the PARs once those revisions are completed. In the interim, ROs should conduct PAR MEs on an at-risk basis using the existing guides.

The ROs are generally required to follow the standardized ME review guides in their entirety, unless the ROs are advised of specific exceptions for the upcoming fiscal year by this memo. For FY 2020, there are two such exceptions:

- Any EBT Review should focus on adjustments; and
- For PAR MEs, the ROs have discretion to exclude one or more of the PAR Guide Elements from the review. We are allowing this flexibility so that the ROs may focus the scope of the existing PAR Guides, when appropriate, to account for limited staff and resources. If a RO decides to exclude any review element(s), the RO must document that decision and the RO’s reasoning behind it in the ME file.

Functional Area:	Minimum Review Cycle:
State ME System	Every 2 years (7 CFR 275.3(b))
PAR (Local and State)	TBD
ABAWD	Every 5 years
E&T	Every 5 years
QC Statistical	Every 5 years
QC Integrity Review	Every 5 years
Recipient Claims	Every 5 years
Recipient Integrity	Every 5 years

SNAP-Ed	Every 5 years
EBT	Every 6 years

Examples:

1. If the RO conducted a State ME System Review in FY 2019, it would conduct the next in State ME System Review in FY 2021, consistent with the 2-year cycle for that functional area (or sooner if the State is found to be at-risk before FY 2021).
2. If the RO conducted a Recipient Claims Review in FY 2019, the RO would plan to conduct the next Recipient Claims Review in FY 2024, consistent with the 5-year cycle for that functional area (or sooner if the State is found to be at-risk before FY 2024).

Scheduling

The ROs must develop a preliminary review schedule for the upcoming fiscal year and enter it into MEMS NextGen by September 1, 2019. The ROs should finalize the review schedule by October 1, 2019, and update it throughout the year if needed.

Federal Procedures

ROs must follow the [SNAP ME Guidance](#) and the standardized SNAP ME Functional Area guides for all ME reviews conducted. MEs include planning, preparation, an on-site review, a report, follow-up and validation of any corrective actions taken by the State. Requirements and guidance include, but are not limited to the following:

- If a State is triggered for an ME review due to at-risk criteria or the minimum review cycle, but the RO believes conducting the review would not be beneficial, the RO must include a justification in the RO’s ME review files for future inspection/audit purposes.
- ROs should escalate any high profile and/or chronic critical program issues discovered, as outlined in Escalation Procedures in the Post-Review & Report section of the SNAP ME Guidance.
- ROs should remind States about their responsibility to immediately correct most ME deficiencies within 60 days and report back to the RO on deficiencies requiring longer term actions, as per 7 CFR 275.3.

Regional Administrators

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We appreciate the efforts made by you, your staff, and your State agency partners to improve program integrity and access through the SNAP ME process. Please contact Casey McConnell at casey.mcconnell@USDA.gov with any questions about this memorandum.

Sincerely,

/s/ Jessica Shahin

Associate Administrator

Supplemental Nutrition Assistance Program