

## Promising Approaches and Challenges for USDA Supplemental Nutrition Assistance Program (SNAP) State Agencies in Implementing Corrective Action Plans (CAPs) (Summary)

### Background

The U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) administers 16 nutrition assistance programs, including the Supplemental Nutrition Assistance Program (SNAP) with the mission to increase food security and reduce hunger—in partnership with cooperating organizations—by providing children and people with low-income access to food, a healthy diet, and nutrition education in a manner that supports American agriculture and inspires public confidence.

SNAP State agencies are required to develop Corrective Action Plans (CAPs) to respond to program deficiencies, including:<sup>1</sup>

- Payment error rate (PER) of 6 percent or greater;
- Case and procedural error rate (CAPER) above the national average;<sup>2</sup> or
- Five percent or more of a State's Quality Control (QC) caseload coded as incomplete.

FNS releases official PER, CAPER, and QC completion rates annually, after which States are notified of their required CAPs for the year. However, in response to the Coronavirus COVID-19 public health emergency, Congress provided State agencies the option to suspend certain QC regulatory requirements from June 2020 until June 30, 2021. As a result, FNS did not have sufficient QC data to establish national and State-level payment error rates for fiscal years 2020 and 2021. Corrective action planning requires State agencies to identify program deficiencies and their root causes, and develop and implement initiatives to reduce or eliminate the impact of these deficiencies on program operations and customer services.

The purpose of this study was to review eight States and describe the approaches used to develop, implement, and monitor CAPs; identify challenges and promising practices throughout the CAP process; and develop recommendations for improving States' abilities to conduct corrective action activities.<sup>3</sup>

### Key Findings

- State agencies emphasized limited staffing as a challenge throughout the CAP process.
- Data-driven approaches and detailed investigations are needed to identify the root causes of errors.
- SNAP State agency and other Federal program staff identified valuable technical assistance including example CAPs, CAP templates, meetings with States, and information sharing between States.

<sup>1</sup> <https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-C/part-275/subpart-E/section-275.16>

<sup>2</sup> SNAP regulations at 275.16(b)(2) require corrective action planning if a State's negative error rate is above 1 percent. FNS issued guidance in 2016 establishing the national average as the new error rate threshold for CAPs starting in Fiscal Year (FY) 2017. See <https://www.fns.usda.gov/snap/new-threshold-state-submittal-caper-corrective-actioncenter-drive-plans>.

<sup>3</sup> The study divided the CAP process in to four stages: (1) planning; (2) drafting; (3) implementation; and (4) monitoring, evaluation, and validation.

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## Methods

The study used a three-part data collection approach:

1. **Survey** and followup interview between April and July 2022 with SNAP agency staff in Alaska, Connecticut, Montana, Nevada, North Carolina, Ohio, Virginia, and West Virginia about their Fiscal Year (FY) 2019 CAPs.<sup>4</sup>
2. **Interviews** with Federal Government staff to learn about corrective action planning in public assistance programs, such as Temporary Assistance for Needy Families (TANF) and Medicaid.
3. **Environmental scan** and literature review to identify additional approaches to program improvement and corrective action planning in public assistance programs.

## Findings

**State agencies emphasized limited staffing as a challenge throughout the CAP process.** Three State agencies said the COVID-19 pandemic created competing priorities that further limited staff time. Remote work alleviated some of the staffing challenges by reducing absenteeism and allowing for new recruitment strategies. Adequate staffing, however, was an ongoing issue for State agencies studied.

**Data-driven approaches and detailed investigations are needed to identify the root causes of errors.** State agencies have access to case review data through SNAP QC System (SNAP-QCS), but these data lag behind current program operations and do not provide a realtime picture of State agency operations needed for root cause analysis. Nevertheless, State agencies most commonly used State QC review and SNAP-QCS data to conduct root cause analysis and monitor corrective actions.<sup>5</sup> FNS Regional Offices and State agencies emphasized the importance of immediately using case reviews to update corrective actions. Montana used data from SNAP-QCS, State Quality Assurance (QA) reviews, and internal audits to create a tracking sheet to review error causes and trends within 30 days. Staff who oversaw other Federal programs shared that several programs used case reviews, focus reviews, and error review committees to help States identify root causes.

**SNAP State agency and other Federal programs staff identified valuable technical assistance, including example CAPs, CAP templates, meetings with States, and information sharing between States.** State agencies identified the following as the most valuable technical assistance received from FNS Regional Offices: emails about expectations for the root cause analysis, meetings to review the CAP and receive feedback, and assistance narrowing the scope of corrective actions and identifying measurable outcomes. State agency suggestions for further FNS technical assistance included additional guidance, example CAPs, CAP templates, monitoring and evaluation tools, and information sharing between States. Other Federal programs also offer promising technical assistance practices. The Center for Medicare and Medicaid Services provides a national template for Medicaid CAPs, holds a kickoff meeting at the beginning of the CAP cycle, meets quarterly with States, and organizes opportunities for States to share promising practices with one another.

**The study team recommended three primary changes to the current CAP process for FNS to consider.**

**1. Align CAPs with broader State agency efforts to reduce errors.** States engage in ongoing error reduction work and describe the CAP cycle as a separate effort. FNS could encourage State agencies to treat CAPs as living documents that contain information on recently completed, ongoing, and new corrective actions and use CAPs to organize and document their error reduction work. To ensure required components of CAPs are consistent with the regulations, this could be implemented through guidance.

**2. Reconsider the frequency of new CAPs.** States often try to implement corrective actions within a year to avoid having multiple CAPs open at the same time (i.e., States aim to close out a CAP before potentially exceeding error rate thresholds again and developing a new CAP). While simple and fast corrective actions can be effective in some instances, other situations call for corrective actions that take longer to implement. Further review of the Federal statute (Section 16 of the Food and Nutrition Act of 2008) and regulations (7 CFR 275.16) could determine whether State agencies are required to implement a new CAP each year they exceed error rate thresholds, or whether continued efforts toward existing CAPs meet

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<sup>4</sup> FY 2019 CAPs were the most recent CAPs available for the study. Selected study States all produced at least one FY 2019 PER, CAPER, or QC completion CAP and represented a range of geographic locations, administrative structures, and SNAP caseload sizes. State-specific findings are presented in the report and appendices.

<sup>5</sup> Some State agencies track QC review results outside SNAP-QCS and use these systems instead of SNAP-QCS during the CAP process.

requirements. If new CAPs are not required, FNS could issue clarifying guidance.

**3. Focus on reducing errors that are within State agencies' locus of control.** Currently, CAPs are validated and closed out once the FNS Regional Office confirms that the corrective action activity is complete. As such, State agencies may choose simple corrective actions that are easy to complete, even if they do not address the errors that prompted the need to develop the CAP. State agencies may also feel they lack total control over the ultimate error rates, as these rates could worsen due to outside factors (e.g., budget cuts or a public health emergency). To incentivize the development of effective CAPs, FNS could require that State agencies demonstrate an improvement in the specific error types targeted by CAPs (e.g., payment errors related to utility deductions). State agencies have more control over those middle-ground outcomes, as compared to the ultimate PER, CAPER, and QC completion rates. FNS could validate and close out CAPs once State agencies demonstrate improvement in the specific targeted error types.

**For More Information:**

Beckerman-Hsu, J., Steigelman, C., Calvin, K., Nelson, L., McCall, J., & Thorn, B. (2023). Promising Approaches and Challenges for SNAP State Agencies in Implementing Corrective Action Plans. Prepared by Insight Policy Research, Contract No. GS-10F-0136X/140D0421F0709. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, Project Officer: Maya Sandalow. Available online at: [www.fns.usda.gov/research-and-analysis](http://www.fns.usda.gov/research-and-analysis).