



SNAP E&T Management Evaluations: How to Best Prepare for a Successful Review

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Ice Breaker

- Who here has participated in a management evaluation? An E&T ME?
- What part of the ME process do you dread?
- Are there areas of the ME that you want more information about?

Overview

- Purpose of the Management Evaluation
- The E&T ME
- Planning and Preparing for the Review
- Post-Review and The Path to ME Closure
- Q&A

Purpose of the Management Evaluation

The Purpose

- Assess compliance with Federal law, regulations and policy
- Provide technical assistance
- Determine corrective actions
- Identify best practices

Four general ME methods /activities:

- Review State-produced policy materials
- Interview
- Review case files
- Observe local offices and staff

Review State-produced policy materials

- What:
 - Materials for households (e.g., notices & applications), policy manuals, worker guides, etc.
- Where/when:
 - Offsite (desk-review) before any other activities.

Interview

- What/who:
 - Advocacy group(s)
 - State-level leadership responsible for SNAP policy
 - Local-level leadership responsible for policy implementation
 - Eligibility workers
 - Households
- When/where:
 - Interview State staff & households onsite, advocates remotely

Review case files

- What:
 - 40 cases total
- When/where:
 - Offsite or onsite

	A	B	C	D	E	F	G	H	I	J	K	L	M
1	#	STAFF INITIALS	CASE NUMBER	CASE NAME	APPLICATION DATE	IS APPLICATION AVAILABLE IN FILE?	CORRECT FILING DATE	DATE OF INTERVIEW NOTICE	INTERVIEW NOTICE COMMENTS	INTERVIEW DATE	TELEPHONE INTERVIEW (Y/N)	DATE OF NOMI	NOMI COMMENT
2													
3													
4													
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Observe local offices and staff

- What:
 - Physical aspects of office
 - Workers processing applications and changes
 - Workers interviewing households
- When/where:
 - Onsite



State Monitoring of the E&T Program

- What are the responsibilities of States to monitor their program?

The E&T ME

Overview of Review Areas

- Work Requirements
- Case Management and Allowable E&T Components
- Mandatory E&T Programs
- Fair Hearings
- Monitoring Participation and Progress
- State Monitoring of Local Offices
- Compliance with Pledge
- Participant Reimbursements
- E&T Fiscal Integrity
- E&T State Reporting
- Provider Determinations
- Workforce Partnerships
- Civil Rights

Newly Added Item from ETO Final Rule

- Provider Determinations
 - The State agency must inform E&T providers of their authority and responsibility to determine if an individual is ill-suited to a particular E&T component
- Consolidated Work Notice and Oral Explanation
 - State agencies are required to provide to all households subject to work requirements both a comprehensive oral explanation and consolidated written notice of the work requirements for individuals within the household.

Newly Added Item from ETO Final Rule

- Good cause for lack of an appropriate and available opening
 - The definition of good cause for failure to comply with the requirement to participate in E&T was revised to include instances in which an appropriate component or opening in an E&T program is not available
- Components and services
 - Case Management
 - Job Retention
 - Employability Assessments
 - Supervised Job Search
 - Removal of Job Finding Clubs
 - Subsidized Work Based Learning

Newly Added Item from ETO Final Rule

- New reporting elements for 4th quarter FNS-583 report
 - The rule modifies the required reporting elements in the final quarterly E&T Program Activity Report provided by State agencies.
- Workforce Partnerships
 - The final rule established workforce partnerships, which are partnerships between the State agency and other entities that create a new way for SNAP participants to gain high quality, workrelated skills, training, work, or experience that will increase the ability of the participants to obtain regular employment

Review Tools

- FNS Uses a variety of tools including:
 - Interview Guides
 - State Policy Staff Interview Guide
 - Eligibility Worker Interview Guide
 - Provider Interview Guide
 - Fiscal Staff Interview Guide
 - Casefile review tools
 - Work Registrant Casefile tool
 - Active E&T Casefile tool
 - Entrance/Exit Conference Scripts
 - Document Request

Planning and Preparing for the Review

Review Timeframes

- **Selection of Review Sites** - No later than the end of October. Regions will then notify States of all upcoming ME's in the upcoming fiscal year.
- **Scheduling Letter and Submission of Pre-Site Docs** –
 - Issue to State at least 60 days prior to the review.
 - Submit pre-site documentation at least 30 days before review. Once files submitted, FNS will review and conduct pre-work.
- **ME Logistics/Planning with State and Local Office** – *Best Practice:* FNS will meet with State/Local Office to go over ME logistics at least 30 days prior to review.
- **Entrance Conference** – flexibility, any time prior to conducting the ME or on the 1st day of the ME
- **THE REVIEW!**
- Conduct the **Exit Conference** within 20 calendar days of **Field Work Completion**.
- **ME Report Issuance** – Issue within 60 calendar days from date of Exit Conference.
- **Corrective Action Response** – Due within 60 calendar days of the ME Report Date.
- **Response to CAR** – RO will reassess and follow up within 20 calendar days and 30 calendar days for complex issues



Pre-Site Review Documentation

- State E&T Policy Materials
- E&T Related Notices and Forms
- Samples of Client Employability Plans
- State E&T Reporting
 - FNS-583 Validation
 - Outcome Reporting Data Validation
- Contracts between State and entities performing E&T functions
- Fiscal Documentation
- State Monitoring of Local Operations



What to Expect During an ME

Desk Review

- Request and Review of Pre-Site Documentation
- Case File Review
- Virtual Interviews with State and Local Agency Staff

On-Site Review

- Learn firsthand how E&T policy is being implemented "on the ground"
- Interviews with State and Local Agency Staff
- Observations of service delivery (orientations, assessments, E&T activity)



E&T Case File Review

The of the goal of the case file review is to:

- To determine whether the client should have been work registered, were they entitled to a work exemption, and should they have been referred for participation in E&T;
- To determine if client was notified of work requirements;
- To determine whether the State is following policy in their Plan on which components clients should enter;
- To determine that any limits on work hours are being correctly applied;
- To determine that E&T providers are fulfilling the responsibilities outlined in the contract;
- To determine that the State is following correct policy and procedures in providing participant reimbursements as outlined in the certification manual and the E&T plan;
- To determine that reimbursements are provided accurately and timely;
- To determine that reimbursements are reasonably necessary; and
- (For Mandatory E&T Programs) - To determine that sanctions are being handled properly and that the State considered good cause.



Common E&T Findings

- Implementation of ETO Final Rule (e.g., Consolidated Work Notice, Provider Determination, Advisement of E&T Opportunities at Recert)
- Inadequate screening of Federal exemptions/screening for appropriateness of referral.
- Work requirements are not verbally explained.
- Inadequate tracking of E&T participation.
- Good cause process is inconsistent with Federal Requirements.

Mandatory E&T Program:

- Failure to inform mandatory E&T participants that they may be exempted from E&T participation if monthly expenses exceed allowable reimbursement amount.
- Required participation hours in Workfare Component inconsistent with Federal Requirements.
- E&T providers are not reporting noncompliance to the State agency within 10 working days as stipulated in the Federal regulations.



Post-Review

- Issuance of ME Report
 - FNS has 60 days following the exit conference to issue a report detailing the findings from the ME
 - The State then has 60 days to respond to the report
- Corrective Action
 - The ME report will identify corrective actions to resolve findings
 - The State will have to opportunity to agree/disagree with both the findings and corrective actions in their response to the report
 - Once all corrective actions have been agreed upon by FNS and State, corrective action timeline will be determined

The Path to ME Closure

- Following agreement of corrective actions, the state will have the opportunity to provide evidence that corrective actions have been completed and the issue that resulted in the finding is now resolved.
- Depending on the nature of the finding the corrective action may be able to be completed quickly or could require an extended timeframe
- If this is a long-term corrective action FNS will regularly follow up for updates on the status of the corrective action.
- If the due to changes in the program, the corrective action needs to change FNS and the State will work together to identify the needed changes
- Once all corrective actions are verified FNS will issue a ME Closure Letter to the State



Questions or Share Your ME Feedback