

# Major Changes in the Operation of SNAP

*Notification and Reporting*

FNS Webinar  
April 19, 2016



# Authority

- Legislation:

The Food and Nutrition Act of 2008, as amended, gives the Department the discretion to identify major changes that State agencies must report to FNS, as well as to identify the types of data the State agencies must collect and report concerning the major change.

- Regulations:

Proposed Regulations were published May 3, 2011. Final regulations were published January 19, 2016.

- Implementation:

Any major change implemented after March 21, 2016 is subject to the provisions of the final regulation.

# Definition of a Major Change



# Definition of a Major Change

## Major Changes Include:

- Closure of any local office that performs major functions for 750 or more SNAP households or 5 percent of the State's total SNAP monthly caseload, whichever is less, and there is not another office available to serve the affected households within 35 miles.
- Any reduction or change of the functions or responsibilities currently assigned to SNAP merit system personnel.

# Definition of a Major Change (cont.)

- Substantial increased reliance on automated systems for the performance of responsibilities previously performed by State merit personnel or changes in the way that applicants and participants interact with the State's SNAP agency.
- This includes the replacement of the State's automated systems used in the certification process, adding functionality to the existing automated systems used in the certification process, or changes in the way applicants and participants interact with SNAP unless the State can document that one of these methods is expected to impact less than five percent of the State's SNAP applicants or participants.
- Any significant system upgrade is a major change under this rule.
- Reporting a major change does not relieve States of meeting the requirements for new system approvals.

# Definition of a Major Change (cont.)

- Changes in operations that potentially increase the difficulty of households reporting required information. This could include implementation of a call center or internet web portal for change reporting, a major modification to forms that households use to report changes or the discontinuation of an existing avenue for reporting changes (e.g., if households can no longer contact the local office because all changes must be reported to a unit that handles change reports).
- Selecting a different change reporting policy option, as allowed in section 273.12, or the implementation of a policy waiver related to change reporting would not be a major change.

# Definition of a Major Change (cont.)

- Any decrease in the total number of merit personnel in the State of more than 5 percent involved in the certification of SNAP households from one year to the next. In addition, a decrease of more than eight percent in the total number of merit system personnel in the State involved in the certification of SNAP households over a two year period would be a major change. These decreases would include those resulting from State budget cuts or hiring freezes, but not include loss of personnel through resignation, retirement or release when the State is seeking to replace the personnel within 6 months.
- Other major changes identified by FNS.

# Process

1. Notification and State analysis of change sent to FNS for review
2. FNS confirms automatic State reporting requirements and notifies State of any required additional and/or sub-State reporting
3. States report monthly data quarterly and FNS monitors
4. Corrective action may be required if negative impacts are identified

# State Agency Notification



# Notification requirements

States' initial notification of a major change to FNS must include:

## For Example...

- Identification of the major change  
A State is closing a local office that had been serving 1,000 households. The office being closed is located 40 miles from the next nearest office.
- An explanation of what the change will accomplish  
The purpose of the office closing is to save the State money and to consolidate program administration.

# Notification requirements (cont.)

States' initial notification of a major change to FNS must include:

For example...

- The schedule for implementation  
The office is expected to be closed in nine months.
- How the change will be tested and/or piloted  
Not applicable.
- Whether the change is statewide or the areas it will include  
The office is in an urban county that will have two remaining offices. One county in the State will be affected.

# Notification requirements (cont.)

States' initial notification of a major change to FNS must include:

**For example...**

- The expected effect on recipients and how they will be informed  
Due to an office being closed, recipients in that surrounding area may have to travel further distances or need to access more services online. Notices will be mailed to current participants, signs will be placed in offices, and local news outlets will be contacted.
- How the change will affect caseworkers and how they will be trained  
No new caseworker training will be required. Caseworkers from the closed office are being reassigned to one of two remaining offices.

# Notification requirements (cont.)

States' initial notification of a major change to FNS must include:

For example...

- The projected administrative costs in the first two years  
The State projects a decrease of \$300,000 in administrative costs.
- How the major change will be monitored  
The county manager's office will oversee the closure and reassignment. The emphasis will be on ensuring that all recertification actions are timely.
- How the major change will affect operation of the automated system  
There is no expected impact on operation of the automated system.

# Notification requirements (cont.)

States' initial notification of a major change to FNS must include:

**For example...**

- The State's backup plans if there are significant problems  
**The State can delay closure by up to three months, if necessary.**
- A description of consultation with stakeholders/advocacy groups or public comment  
**The State has notified local advocacy groups and is working with them on developing notices to send to affected households.**
- Procedures the State will put in place to minimize the burdens on certain populations  
**Working with DOT to add two bus lines from affected areas to remaining offices, to assist elderly and households with transportation challenges.**

# Analysis of Change

The analysis portion of the State's initial report includes its projected impact on:

**For example...**

- The payment error rate  
**No impact is expected.**
- Program access, including the impact on applicants filing initial applications and reapplications  
**Some initial disruption can be expected, but minimal impact in the long run.**
- The negative error rate  
**No impact is expected.**
- Application processing timeliness including expedited service

**Timeliness could decrease by 5-10 percent for the first two months.**

# Analysis of Change (cont.)

The analysis portion of the State's initial report includes its projected impact on:

## For example...

- Whether the major change will increase the difficulty certain households will have interacting with SNAP  
A small number of households that prefer face-to-face interaction will be affected, due to increased distance to nearest office.
- Customer service, including the time it takes for a household to contact the State, be interviewed, and report changes  
Since most interviews and reports are by phone, customer services should generally be maintained.
- Timeliness of recertification actions  
State is focusing its resources on this issue and consequently no negative impact is expected.

# Example: Completed Notification Template

## STATE AGENCY NOTIFICATION OF MAJOR CHANGES IN PROGRAM DESIGN

### I. Summary of Change

### II. Description of Major Change in SNAP and its Expected Impact

Please provide the required information below describing the change and/or its expected impact.

#### A. Description:

State is closing a local office that had been serving 1,000 households—40 miles from next nearest office—to save administrative money and consolidate administration.

#### B. Consultation or Public Comment about Planned Change:

Have notified local advocacy groups and working with them on developing notices to affected households.

#### C. Scope of Change:

Office is located next to urban county that will have two remaining offices. One county is affected by this change.

#### D. Implementation Schedule:

Office is expected to be closed in 9 months.

#### E. Effect on Applicants and/or Participants:

Notices to be mailed to current participants, signs posted in offices, and local news outlets will be notified.

#### F. Effect on Caseworkers:

No training required. Caseworkers are being reassigned to one of two remaining offices.

#### G. Administrative Cost:

A decrease of \$300,000 in administrative costs is anticipated in the first two years.



# Submission of Notifications

## When Notifications are Due

State agencies must notify FNS no less than 120 days prior to beginning implementation of a major change, or entering into contractual obligations to implement any proposed major changes. If the State agency is unable to meet the 120 day deadline, the State agency must notify FNS as soon as they are aware of the major change and explain why they could not meet the deadline.

## How to Submit Notifications

State agencies should email completed Notifications to the FNS National Office at [SNAPMajorChange@fns.usda.gov](mailto:SNAPMajorChange@fns.usda.gov). State agencies should copy the appropriate FNS Regional Office contact person on any e-mails to the above address.



# Reporting



# FNS Review and Required State Reporting

- States implementing a major change must report certain required information.
- FNS will evaluate the State's analysis to determine what reporting requirements beyond the following may be necessary.

# Reporting Timeframes

- States must submit reports containing a baseline quarter of data, and monthly data on a quarterly basis, beginning with the quarter prior to implementation of the major change (“baseline quarter”).
- States must submit reports for at least one year after the major change is fully in place.
- FNS may extend the reporting timeframe as it deems necessary.

# Required State Reporting

States must report the number of initial applications that were:

## Example of monthly data...

- received  
1000
- received, and were subject to expedited service  
200
- received, broken out by method of application (i.e., in-person, online, telephone, mail, fax)  
400/400/100/100/0
- Denied  
100
- approved timely  
800
- subject to expedited service, that were processed within 7 days  
180
- approved untimely  
100
  - approved untimely that were subject to expedited service  
20



# Required State Reporting (cont.)

States must report the number of:

## Example of monthly data...

- initial applications denied, broken out by those denied due to ineligibility and those denied because the State was unable to determine eligibility

50/50

- households due for recertification

3000

- recertification applications received

2000

- recertification applications received broken out by method of application (i.e., in-person, online, telephone, mail, fax )

800/1000/200/0/0



# Required State Reporting (cont.)

States must report the number of:

## Example of monthly data...

- households that were recertified without a delay or break in benefits  
1700
- households that the State recertifies with a delay or break in benefits of less than one month  
100
- households due for recertification that fail to timely reapply for recertification  
1000
- recertification applications that are denied  
200
- recertification applications that were denied broken out by those denied due to ineligibility and those denied because the State was unable to determine eligibility  
150/50



# Required State Reporting (cont.)

- The information required above must be reported separately for households with elderly members and households with members that have a disability.
- Most or all of the information required above must be disaggregated to provide sub-state information.
- FNS will consult with States on a case-by-case basis to determine if this information must be reported by: local offices, call centers, county, project areas, or by other administrative structures within the State.
- FNS' determination will be based upon the type of major change and the State's SNAP organization.

# Additional Reporting

In addition to the “automatic” reporting elements, FNS may require more specific or timely information concerning the impact of the major change within the following areas:

- Payment accuracy and Negative error rates
- Impact on certain households
- Impact on customer service

# Additional Reporting (cont.)

For example...

- Payment accuracy and Negative error rates. FNS may require data from case reviews focused on households with specific characteristics, to obtain greater local reliability, or to provide more timely data.

If a State were to implement a new call center, FNS might request quality control data on households with elderly members.

# Additional Reporting (cont.)

For example...

- Impact on certain households. A major change that could disproportionately impact vulnerable households identified may require additional information on the impact of the change on these households.

Provide county level data on the number or type of complaints received from households with disabled members regarding the new call center.

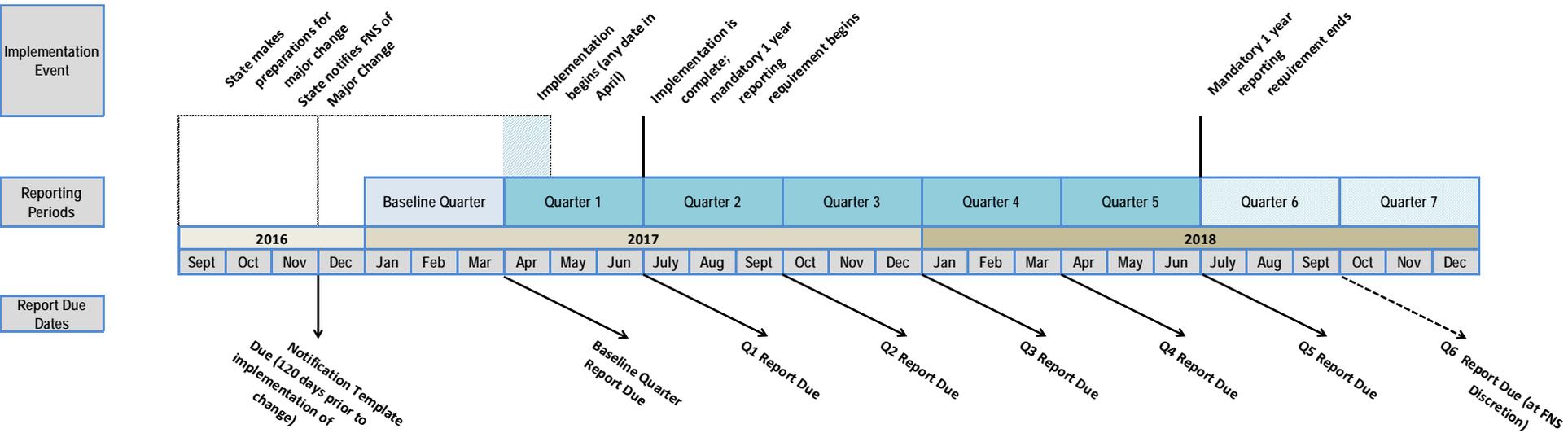
# Additional Reporting (cont.)

For example...

- Impact on customer service - Some major changes may require specific information that is not typically available from a State's automated SNAP system.

The State might be asked to provide FNS with the number and percentage of dropped calls to a call center.

# Reporting Timeline Graphic



# Example: Completed Reporting Template

DATA ELEMENTS		HOUSEHOLD ("HH") TYPE	MONTH		
			March	April	May
Initial Applications Received ("Apps Rec'd")	Total Number ("No.") of Initial Apps Rec'd	Regular HHs	100	200	200
		Elderly/ Disabled HHs	100	200	200
	No. of Initial Apps <u>Rec'd In Person</u>	Regular HHs	100	25	75
		Elderly/ Disabled HHs	100	25	75
	No. Initial Apps <u>Rec'd Online</u>	Regular HHs	50	50	100
		Elderly/ Disabled HHs	50	50	100
	No. of Initial Apps <u>Rec'd by Phone</u>	Regular HHs	10	20	20
		Elderly/ Disabled HHs	10	20	20
	No. of Initial Apps <u>Rec'd by Mail</u>	Regular HHs	20	20	10
		Elderly/ Disabled HHs	20	20	10
	No. of Initial Apps <u>Rec'd by Fax</u>	Regular HHs	0	0	0
		Elderly/ Disabled HHs	0	0	0



# Submission of Reports

## When Reports are Due

State agencies must notify FNS no later than 90 days after the end of each quarter. If the State agency is unable to meet the 90 day deadline, the State agency must notify FNS as soon as they are aware of the delay and explain why they could not meet the deadline.

## How to Submit Reports

State agencies should email completed Reports to the FNS National Office at [SNAPMajorChange@fns.usda.gov](mailto:SNAPMajorChange@fns.usda.gov). State agencies should copy the appropriate FNS Regional Office contact person on any e-mails to the above address.



# FNS Review of Reports

- If FNS becomes aware that a State is implementing a major change that has not been formally reported, FNS would work with the State to determine if it is a major change, and, if so, require the State to follow the process outlined above.
- If the data a State submits regarding its major change or other information FNS obtains indicates an adverse impact on SNAP access or integrity, FNS would work with the State to correct the cause of the problem and provide whatever technical assistance it can.
- Depending upon the severity of the problem, FNS may require a formal corrective action plan.

# Important Links

- Rule

<https://www.federalregister.gov/articles/2016/04/08/2016-08031/supplemental-nutrition-assistance-program-review-of-major-changes-in-program-design-and-management>

- Guidance documents, the Notification Template, and the Reporting Template will be available at:

<http://www.fns.usda.gov/snap/policy>



# Questions

