Department of Social and Health Services

Olympia, Washington

EAZ Manual

Revision #1304

Category Quality Control

Issued 10/08/2024

Revision Author: Alex Schuler

Division CSD

Mail Stop 45440

Phone 425-555-1212

Email alexander.schuler@dshs.wa.gov

Summary

Updating worker responsibilities under WAC 388-464-0001 to reflect the current error threshold \$57 and removing staff instructions to notify the client of QC reviews which are now in the CSD Procedure Handbook.

Updated October 8, 2024 See below for edited text:

Quality Control

Revised September 17, 2021 October 8, 2024

Purpose:

The Quality Control (QC) review process conducted by the Division of Program Integrity (DPI) Quality Control team is designed to measure payment accuracy in the federal food

assistance program. The review process also provides information to identify error concentration and trends to evaluate program effectiveness.

WAC 388-464-0001 Am I required to cooperate with quality assurance?

• Clarifying Information and Worker Responsibilities

Clarifying Information - WAC 388-464-0001

1. Quality Control Team:

As a condition of receiving federal funds for the administration of the food assistance program (Basic Food Program/Supplemental Nutrition Assistance Program - SNAP) the federal government requires states to maintain a Quality Control system. The Quality Control (QC) team must:

- a. Aid in establishing corrective action plans.
- b. Compile and analyze review findings to determine numbers and types of errors, and;
- c. Review a statistically valid statewide sample,

2. Review sampling:

- a. The Review Sample Time Period covers the federal fiscal year (FFY) which runs from October 1st of one calendar year through September 30th of the following year.
- b. Cases are selected for review at random from active recipients of food assistance benefits. This is identified as the active sample.
- c. A random negative sample, also known as Case and Procedural Error Rate (CAPER) sample, is drawn from denied, terminated, and suspended case actions.

3. Case review process:

The QC review process typically includes:

- a. A report of findings to ESA's Community Services Division (CSD), Aging and Long-Term Support Administration's Home and Community Services (ALTSA/HCS), Developmental Disabilities Administration (DDA) and to the federal government.
- b. A determination of the correctness of payment and benefit eligibility.
- c. Verification of all eligibility factors.
- d. A field investigation including a personal interview with the recipient.

e. A review of the electronic file and case record.

4. Federal Quality Control review:

- a. Federal quality control staff reviews a random sample of cases completed by state DPI QC team to validate the review findings.
- b. If Federal quality control results are different than the original state findings, and state QC team agrees with those results, QC will notify ESA/CSD, ALTSA/HCS or DDA for necessary action(s).
- 5. **Exempt errors:** Food assistance errors, with the exception of ineligible cases in any amount, that result in an error amount of less than \$5739 are not counted in the federal QC error rate.

Worker Responsibilities - WAC 388-464-0001

- 1. Notifying Customers of Quality Control Reviews:

 DPI notifies customers that are randomly selected for a QC review by letter and/or phone call. If a customer or authorized representative calls CSD, ALTSA, or DDA and indicates they have been contacted by DPI for a QC review:
 - a. Remind the customer or authorized representative that they will need to cooperate with the OC reviewer.
 - b. Notify the customer or authorized representative that the results for not cooperating with the QC review process is disqualification. See #3 Period of Non-Cooperation QC Sanction.

2.1. Non-cooperation and QC sanction:

- a. If the household refuses to cooperate in the QC review process, the QC reviewer will notify a DPI worker to take action immediately after verifying the customer's Equal Access (EA) plan. The notice will contain:
 - i. Notification the household has refused to cooperate with the review process;
 - ii. The period of ineligibility;
 - iii. What the customer can do to end the QC sanction; and
 - iv. The phone number and QC reviewer name for future contact.

- b. Upon receipt of the notice of non-cooperation, the DPI worker must take the following action:
 - i. Review the customers EA plan and notify the customer or authorized representative immediately that the entire food assistance household benefits will be terminated.
 - ii. The effective date of termination is the first of the month following the end of the 10-day advance notice period.
 - iii. The notice should contain the following:
 - The specific reason for the non-cooperation determination;
 - The QC sanction time period;
 - What the customer must do to end the QC sanction;
 - An overpayment may have occurred; and
 - The phone number of the QC reviewer/unit.
- c. The DPI worker must terminate benefits unless QC notifies the DPI worker the QC sanction is lifted.
- d. For food assistance household's, the DPI worker must terminate benefits effective the first of the month following the end of the 10-day advance notice period.

3.2. Period of Non-Cooperation QC Sanction:

A household that is sanctioned for not cooperating in the Basic Food quality control review is ineligible for one hundred twenty-five days after the end of the annual federal review period (i.e. February 2nd) in which the case was selected for review, unless the household cooperates with QC before the end of the federal review period. The annual federal review period begins October 1 and ends September 30 each year (e.g., federal fiscal year 2021 (FFY 2021) begins October 1, 2021 and ends September 30, 2022).

EXAMPLE:

Jordan's case was selected for review in October 2021, the first month of the federal fiscal year. In November 2021, they refused to cooperate with the QC review, and their household was sanctioned effective December 1, 2021. Unless she cooperates with QC, their sanction period will continue through February 2, 2023 (which is 125 days after the end of the federal review period that ends September 30, 2022).

EXAMPLE:

Than's case was selected for review in September 2022, the last month of the federal fiscal year 2021. If the household refuses to cooperate with QC, the household's sanction ends February 2, 2023; the same as in the above example.

4.3. Re-application after termination due to QC non-cooperation sanction:

If an applicant has been terminated from assistance due to a QC non-cooperation

sanction and reapplies before the end of the QC sanction period, review the case record for a notice of cooperation from QC. If there is none, notify the QC reviewer/unit the customer is reapplying and document the response from QC on the narrative screen in ACES.

- a. Staff should ensure that the customer has complied with the QC process **before** approving food assistance if within their QC sanction period.
- b. If the applicant has not cooperated with QC and is within their QC sanction period:
 - i. Authorize assistance effective the date all eligibility factors are met, including cooperation with QC.
 - ii. Refer the applicant to QC to complete the QC review process; and
 - iii. Pend the application for cooperation with QC but request the necessary verification of current circumstances;
- c. If the applicant continues to not cooperate with QC, deny the application no later than 30 days from the date of application.
- d. For an applicant who reapplies after the QC sanction period expires, verify all eligibility requirements. After the QC sanction period expires, no referral to QC is necessary.
- e. If the individual cooperates with QC after the sanction has begun, the individual must complete a new application to be eligible for benefits.

EXAMPLE:

QC sanction for non-cooperation is imposed beginning July 1. The customer cooperated with QC on July 10. If the customer wishes to receive Basic Food, the customer must complete a new application and complete the application process. Eligibility begins the date the application is received.

EXAMPLE:

Jordan is sanctioned for non-cooperation with QC review beginning February 1. Their food assistance is closed. April 15, Jordan reapplies for Basic Food. The PBS confirms that Jordan has not cooperated with the QC reviewer. Jordan complies with the QC review process on May 10. Jordan's is eligible for Basic Food starting May 10.

5. **Quality Control review findings:**

- a. QC reviews focus on correctness of eligibility and payment in a specific review month. The findings from the review are reported via the DSHS 05-012A(X), which is electronically transmitted to the ECR.
- For correct cases, no action is required by the Public Benefit Specialist
 (PBS) unless other information is supplied which affects the customer's eligibility.
 The PBS is responsible for evaluating the information and taking appropriate action.

- c. For incorrect cases, the report from QC should contain information specifying;
 - i. The type (overpayment, underpayment, ineligible, denied, terminated, or suspended) and dollar amount of the error, if appropriate;
 - ii. The applicable rule citation;
 - iii. A narrative explaining how the error was discovered;
 - iv. A listing of Federal reporting codes indicating:
 - Element and nature codes (program requirements);
 - Type of error (agency or recipient responsibility);
 - Discovery (how the error was identified);
 - Verification (how the information supporting the error finding was verified: e.g., from what source); and
 - Occurrence (relationship between error and most recent action on case).

6. Processing Basic Food Error Cases (Federal Quality Control Reviews):

QC will inform CSD, ALTSA/HCS, or DDA when a case error is identified.

Once the error has been finalized, the PBS will take appropriate action on the case, including computing and establishing an overpayment or issuing an underpayment if necessary.

CSD, HCS, or DDA will initiate corrective action, including:

Error analysis;

Changes to procedures where appropriate; and

Provide training.