SAN FRANCISCO COUNTY'S FOOD STAMP ERROR RATE REDUCTION PROGRAM

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EXECUTIVE SUMMARY

INTRODUCTION

During the 2003 Management Evaluation by the Food and Nutrition Service (FNS), Napa County discovered that there was a breakdown in communication between the program and our Quality Assurance Program. That issue, along with our high error rate, prompted me to choose this project in order to look at San Francisco County's Error Rate Reduction Program and the great results they have had in reducing their error rate from 10.22 % in 1996 to 5.23% in 2003.

Using some of the same principles utilized by San Francisco County, we were able to reduce our error rate from 14.10 % in January of 2004 to 5.76% in the last quarter of 2004.

FINDINGS

Analysis of the error classes in San Francisco County revealed wages and salaries, shelter deductions, and miscellaneous or "other" to be categories where the errors were most prevalent, followed closely by errors in budgeting the Standard Utility Allowance. San Francisco County devised a proactive plan to reduce its error rate.

Areas of particular interest to me were:
- The use of ad hoc reports being run to identify cases with potential coding errors of non-citizen status. These reports are distributed to staff for case reviews. Because working with IT was

costly and inefficient, they found a way to get core data exported into Access where they could develop and run a variety of ad hoc reports monthly. The beauty of this design was the freedom it gave the department to compile information as needed.
- The implementation of an Error Review Panel and a Corrective Action Panel. Both groups meet monthly and consist of staff from the management level to analysts and supervisors. The Corrective Action Panel is a committee that the Public Assistance Section organized in order to address their specific error rate and includes staff development personnel. Corrective measures are discussed and refresher-training courses are planned. The Error Review Panel meets to review quality control cited errors as well as cases with rebuttals.

OUTCOMES

I was especially impressed with the success in the above mentioned areas. Napa County implemented similar strategies in 2004 in order to reduce its Food Stamp error rate.

Although ad hoc reporting was not new to Napa County, we began to see the potential of using the reports as a tool to help us increase our Food Stamp accuracy rate. We started with our "Able Bodies Adult Without Dependents", (ABAWDs) population, which was an area of concern in regards to errors. A list of ABAWDs is now distributed to staff

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monthly. Workers review these cases to determine client status.

We have also created a Quality Assurance (QA) Action Team and a Resolution Committee. Every supervisor from the Public Assistance and CalWORKs divisions, program managers, program evaluation supervisors, analysts, quality assurance staff, and staff development personnel now participate in the QA Action Team meeting. This group meets bi-weekly to discuss error trends, review reported findings, and plan for training and incentives. It has proven to be a very valuable method of bringing key players together for discussion and action planning.

The Resolution Committee consists of program managers, the quality assurance manager, program evaluation supervisors and analysts from both the Public Assistance and CalWORKs divisions. This committee meets on an as-needed basis specifically to resolve issues between staff and QA findings. These issues are taken to state Food Stamp analysts if necessary. This committee has also proven to be a successful means of communication and resolution in the process of error reduction.

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INTRODUCTION

The County of San Francisco, Department of Human Services serves almost 100,000 San Franciscans each year. The people served are those who suffer hardships or have been unable to participate fully in the social and economic life of the community.

In June of 2003, there were 15,849 Non-Assistance Food Stamp (NAFS) recipients represented by 14,624 cases. There were 2,596 children and 13,253 adults receiving Food Stamps (FS). Of the total number of FS recipients, 9,196 (58%) were male, and 6,653 (42%) were female. Homeless recipients accounted for 4,196 (33.3%) of the caseload.

PURPOSE

The purpose of this project is to examine the success of San Francisco County's Food Stamp Error Rate Reduction program over the past few years, which brought them from a 10.22% error rate in 1996 to a 5.23% rate in 2003.

ERRORS AND TRENDS

In analyzing the causes of errors in San Francisco County, several different areas were noted as having concerns. One of the major areas was earned income. Income was not being detected or was being incorrectly used in the case budget. In the year 2000, this accounted for 40% of the case error rate.

It was determined that the participant-caused errors increased by 16.7% from Federal Fiscal Year (FFY) 1999 to FFY 2000, and the agency-caused errors increased by 20.8% over the same time period. In the Public Assistance (PA) section, error causes were attributed to caseload size variations, multiple programs like FS, CalWORKs, WTW, and Medi-Cal, variation in worker experience, lack of training on detection of unreported income, and inadequate use of the Earnings Clearance System (ECS).

Secondly, non-citizen information was incorrectly input into San Francisco's eligibility system. In particular Legal Permanent Resident (LPR) aliens who obtained US citizenship by process of naturalization were not reported to the agency. San Francisco County did not have a system to track minor LPRs who were reaching 18 years of age.

San Francisco's Quality Control also found that the eligibility workers incorrectly coded people eligible for federal FS and state FS (or CFAP-California Food Assistance Program). The county's staff also struggled with incorrect proration of income caused by how the county's Case Data System (CDS) was coded. Training was conducted prior to the time the issue was identified, but due to personnel movements and other changes, the impact was not noticeable.

There were also errors in the areas of shelter deductions, household composition, and the Standard Utility Allowance. CW-7 stuffers were sent out to participants as a reminder of their reporting responsibilities in regards to changes in

household composition, employment, and employment income. The Income Tracking Sheet was developed to help staff compare year-to-date earnings and complete reporting of earnings. This tracking sheet became a mandatory tool for eligibility workers.

Three additional Quality Assurance (QA) reviewers for the PA section were hired in order to increase the number of cases being reviewed and to cover more caseloads from the outstation units. An Error Review Workgroup was formulated from QC, QA, and the NA and PA programs to assist in identifying the common error areas and to recommend corrective action measures to programs.

SAN FRANCISCO COUNTY'S BEST PRACTICES

San Francisco County has a proactive approach to error detection. CDS data is analyzed by submitting specific queries designed to identify errors. Eligibility staff are informed of the findings and follow up to ensure that corrections are made. Designing complex CDS ad hoc reports through the county's Information Technology (IT) department is costly. The county now receives monthly Food Stamp extracts and transfers them to an access database where they can run queries and manipulate the data.

The data collected in access are used to produce a variety of ad hoc reports "in house" which has reduced the department's dependence upon the county's IT staff. One such example is the process of identifying and correcting Federal/CFAP Immigrant errors, such as:
- Persons without an alien registration (A) number but with a CFAP indicator code

- Mixed households with Benefit Issuance Code 19F and lacking any CFAP indicator on the person detail screen

These and many other reports are run monthly. Cases with likely errors are listed on spreadsheet reports and distributed through section managers to line supervisors, who conduct and document a supervisory review of the case.

In the example above, the report may indicate that a client has become naturalized and supervisory review of the case may reveal related payment errors not found by data analysis. CFAP indicator codes are key to accurate data analysis. What appears to be a simple coding error may point to more serious payment errors.

This kind of data analysis is a new initiative and has brought steady declines in San Francisco's NAFS error rates. They have learned that these reports must be generated and worked every month in order to see the success demonstrated in reports with no cases in error. Proactive error detection has increased San Francisco's awareness of common issues among staff and allows for more strategic use of their resources.

Another "best practice" has been developed around the Income Eligibility Verification System (IEVS) abstracts. Income and eligibility information is requested through IEVS and is used in determining current and ongoing eligibility. An abstract is generated for each individual on a case who has provided a Social Security number (SSN). They have implemented a system of controls for three IEVS reports, ECS 155, NHS-410, and PVS 040. This system ensures accountability for the receipt and processing of IEVS reports. All IEVS reports are filed in the case record even if an action is pending.

Line workers are responsible for reviewing each case for current eligibility and initiating current case action if necessary. They make appropriate referrals and narrate findings in the case folder. They then submit a completed transmittal report to the supervisor.

Supervisors ensure that reports are promptly distributed and monitor workers' progress based on the transmittals submitted by their staff. They then forward the list to the section manager. The section manager reviews the lists for completeness, clarifies any discrepancies with the supervisor and reports compliance to the program manager.

An IEVS desk guide was provided to the NAFS staff as a reference tool and is currently being used as a resource guide.

ERROR REVIEW PANEL/ CORRECTIVE ACTION PANEL

The Error Review Panel started during the 2001-2002 Fiscal Year, and has proven to be a very effective corrective action tool. The panel is composed of section managers from the NAFS and PAFS departments, the FS program analyst, the QC supervisor, the CalWORKs program specialists, and a FS supervisor. This panel meets once a month to review cases with QC cited errors, as well as cases with error rebuttals. Conflict in regulation or agreements are discussed and pursued with the FS Policy Bureau as necessary. Since the section managers are part of the panel, they are immediately able to implement corrective action of the errors cited to avoid future occurrence.

The Corrective Action Panel is a committee that the PA section organized in order to address their specific error rate. The committee is composed of the

PA section manager, program specialist, and supervisors of the PA section, staff development supervisor, and the QC supervisor. This panel meets once per month. PA-only errors are discussed, and corrective measures are planned with the assistance of Staff Development. Refresher training courses are planned for the PA line staff as needed.

QA/SECONDARY REVIEW

San Francisco Food Stamp Quality Assurance (FSQA) is part of a larger system emphasizing different levels of second party reviews, accountability, and corrective action. The system collects data to measure performance, recognize excellence, conduct error analysis linked to corrective actions, and for proactive error detection. Accountability and corrective action are integrated throughout the system. The system is developed and is "owned" by the Food Stamp program.

FSQA is really the backbone of the second party review system, and staffs eight full-time program specialists. These specialists conduct comprehensive desk reviews. Unlike QC, FSQA reviewers do not investigate. They review only information in the case folder or that is available to the worker through computer searches.

The goal of FSQA is to review as many cases as possible in order to correct as many cases as possible; guard against QC errors, and to take valid measurements of worker performance. Reviewers also serve as expert resources for line staff. They coach and assist with problem-solving.

Supervisory reviews are structured, documented, and completed according to standards which are flexible and change in response to corrective action needs. These reviews may target specific areas,

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such as earned income, citizenship, or application of the Standard Utility Allowance.

FSQA and supervisory review findings may trigger a section manager re-review. Section managers use these findings to coach and develop line supervisors, recognize successes, and find ways to avoid common errors. These reviews are notated in the file and are subject to re-review by QC, FSQA, Appeals, section managers, and other Food Stamp reviewers.

NAPA COUNTY'S RESPONSE

Napa County began the year 2004 with a dollar error rate of 14.10% for PA and NA Food Stamp caseloads combined. After a successful year of analyzing error trends and developing a Performance Improvement Plan, Napa County was able to reduce the dollar error rate to 5.76% in the final quarter of 2004.

NAPA COUNTY'S ERRORS ARE NOT UNFAMILIAR

We began by looking at our error trends. It was discovered that large portions of our errors were not unlike those identified by San Francisco County. We had errors in the areas of income and deductions as well as eligibility for special populations, such as immigrants and Able-bodied Adults Without Dependents (ABAWD). We also discovered that there were some incongruities in the manner in which supervisors were reviewing cases. These differences in process sometimes led to errors not being caught in a timely manner. We were also concerned that the level of accuracy of the information being entered was, at times, compromised. Since our eligibility system, ISAWS, is capable of calculating the food stamp budget, we were concerned

that perhaps workers had become too dependent upon the system determining the correct amount of benefits the recipient should receive.

TOOLS AND TESTS ARE IMPLEMENTED

An ad hoc report on ABAWDs was developed. We began to distribute the report monthly to supervisors and then to line staff in order to ensure the review of those cases on a monthly basis.

Training was provided to supervisors, (and later to lead workers) in order to develop a more standardized approach to case reviews. A key component of our strategy was to offer refresher training to eligibility workers in the areas identified with errors. We also utilized a "pre- and post-test" method of assessing the level of knowledge and retention of each worker and the effectiveness of the training provided. A pre-test was given in food stamp manual budgeting, followed by training and then a post-test about thirty days later to assess retention.

We began to practice manual FS budgets during unit meetings and are following up with a test every quarter in the year 2005. We also provided training on shelter expenses, FS over-issuances, and eligibility for special populations.

A list of "hot screens" was developed and printed on a brightly colored sticker to be placed at each workstation in order to remind workers of the most important screens to review in the ISAWS system. The screens chosen to be "hot screens" directly impact the areas with the most errors. A guide for non-citizen eligibility was developed and distributed and a system of bringing "Top Ten" items from the supervisory team meetings to the bi-monthly Operations Meeting was developed in order to clarify areas of confusion.

Lastly, we have implemented our "Consider This" program, which provides incentives for staff that offer ideas to enhance quality. The ideas are examined, and, if implemented, gift certificates are presented in recognition of the idea.

NEW STAFF EQUALS HIGHER ERROR RATES

Another issue noted in regards to staffing was the fact that 57% of the eligibility workers in the NAFS division have only been a member of the county's eligibility workforce for 1-2 years. That, along with the vacancy/turnover rate over the past few of years, was a contributing factor to the rise in the error rate. Napa County has been successful in recruiting and hiring four limited term eligibility workers to help with the backlog of cases. The strategy is to plan for the vacancies in the hope that as vacancies occur, a limited term worker can be moved into the permanent position, therefore limiting the amount of time a permanent position remains vacant. The position would be filled with a trained worker and not sit vacant while the new recruit attends induction training.

CONCLUSION

In summary, it is clear that many of the ideas implemented in San Francisco County in regards to quality assurance can be of great value to any county. Key elements in the program, such as review tools, ad hoc reports, and additional staff can be customized to fit the size and budget of any county in order to see a vast reduction in the Food Stamp error rate. A strong quality assurance program ensures that clients receive their benefits accurately and timely. It also holds the workforce accountable for day-to-day work and rewards the workers for their exemplary efforts.

Many of the processes developed in San Francisco County over the past few years were implemented in Napa County during the year 2004 and have produced similar results in the reduction of our Food Stamp error rate.

ACKNOWLEDGEMENTS

REFERENCES

San Francisco County Quality Control Performance Data - FFY 2003. Retrieved from www.sfgov.org .