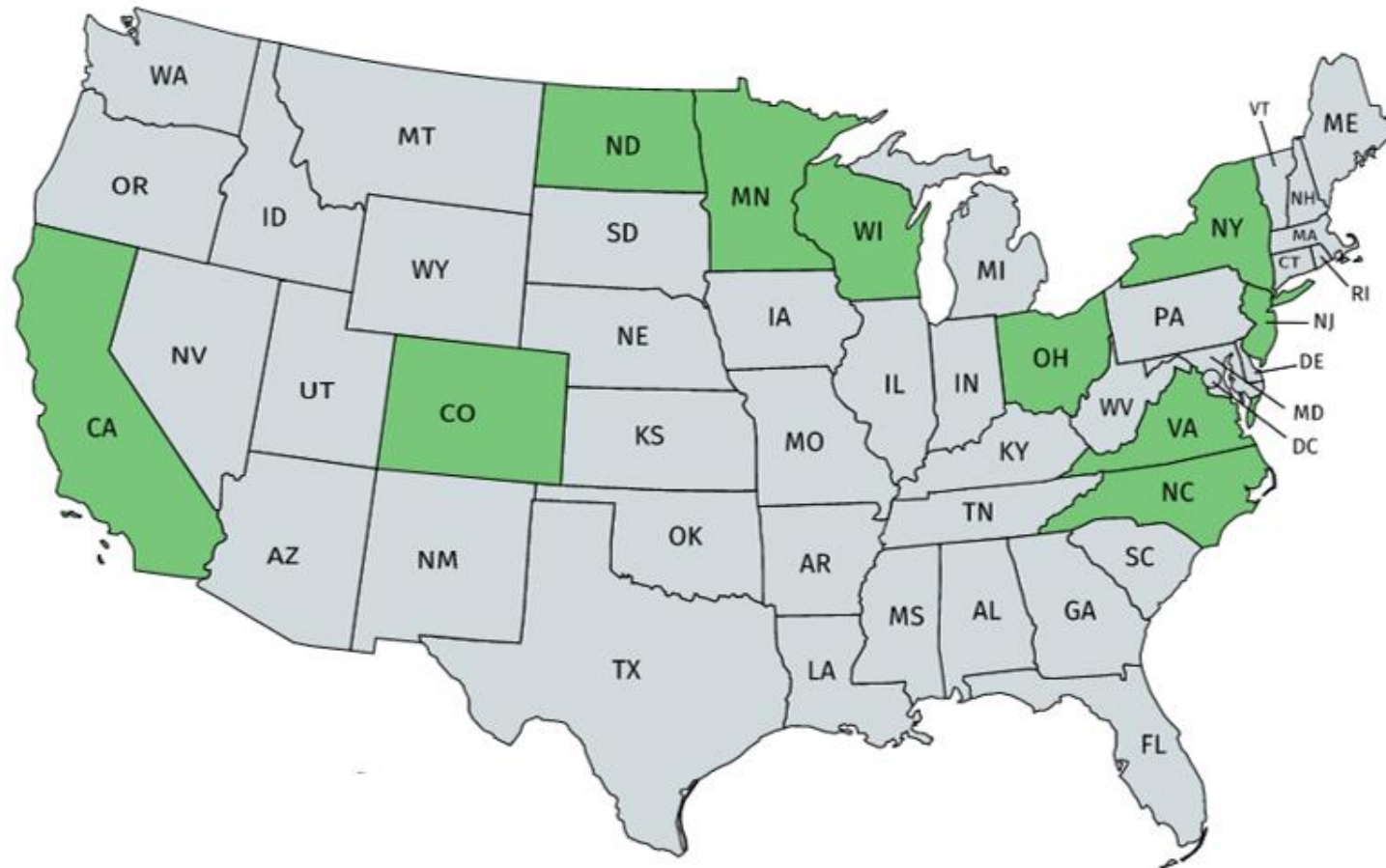


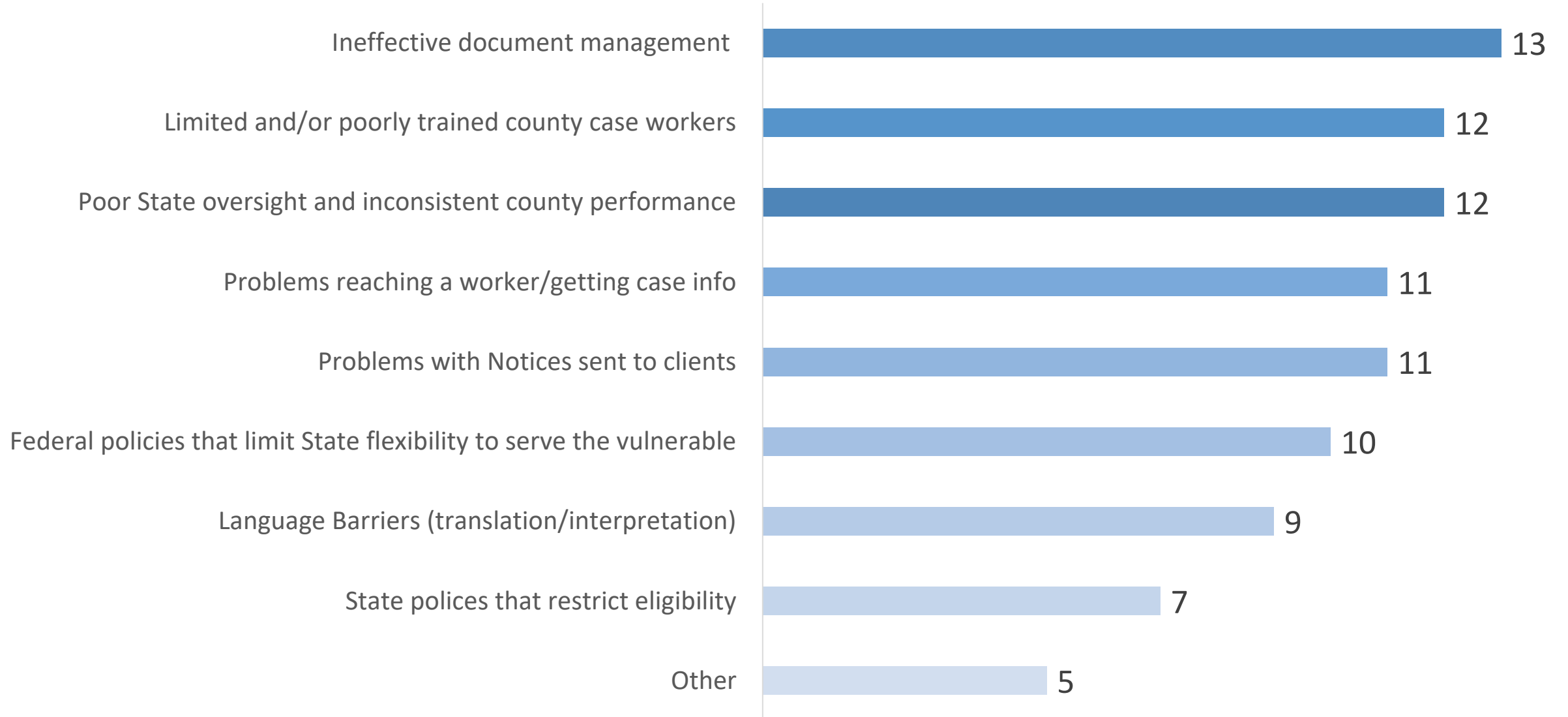
# Ten Degrees of Decentralization

*An Overview of SNAP Advocacy Opportunities in County Administered States*

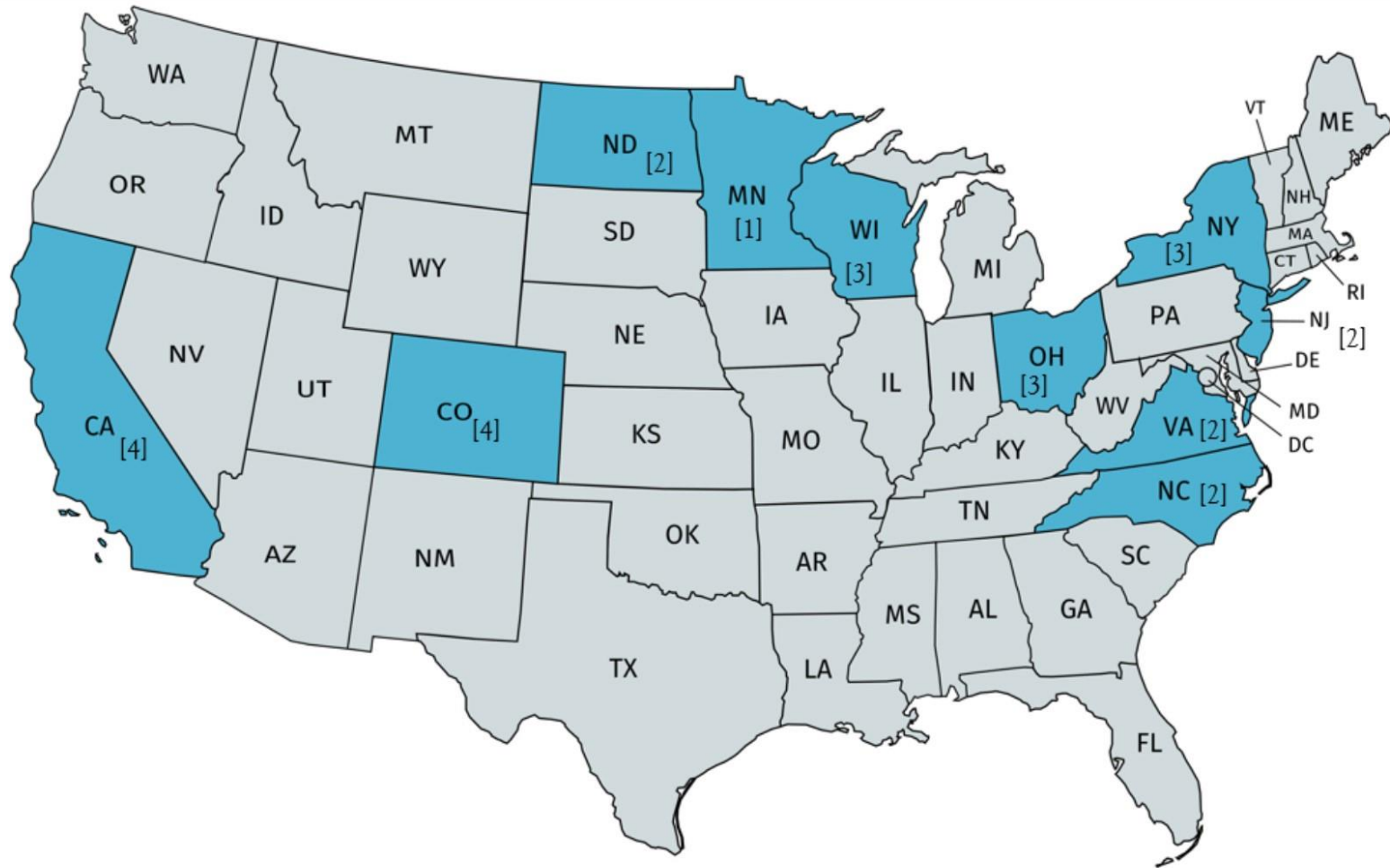


# What are the biggest barriers to SNAP access in your state?

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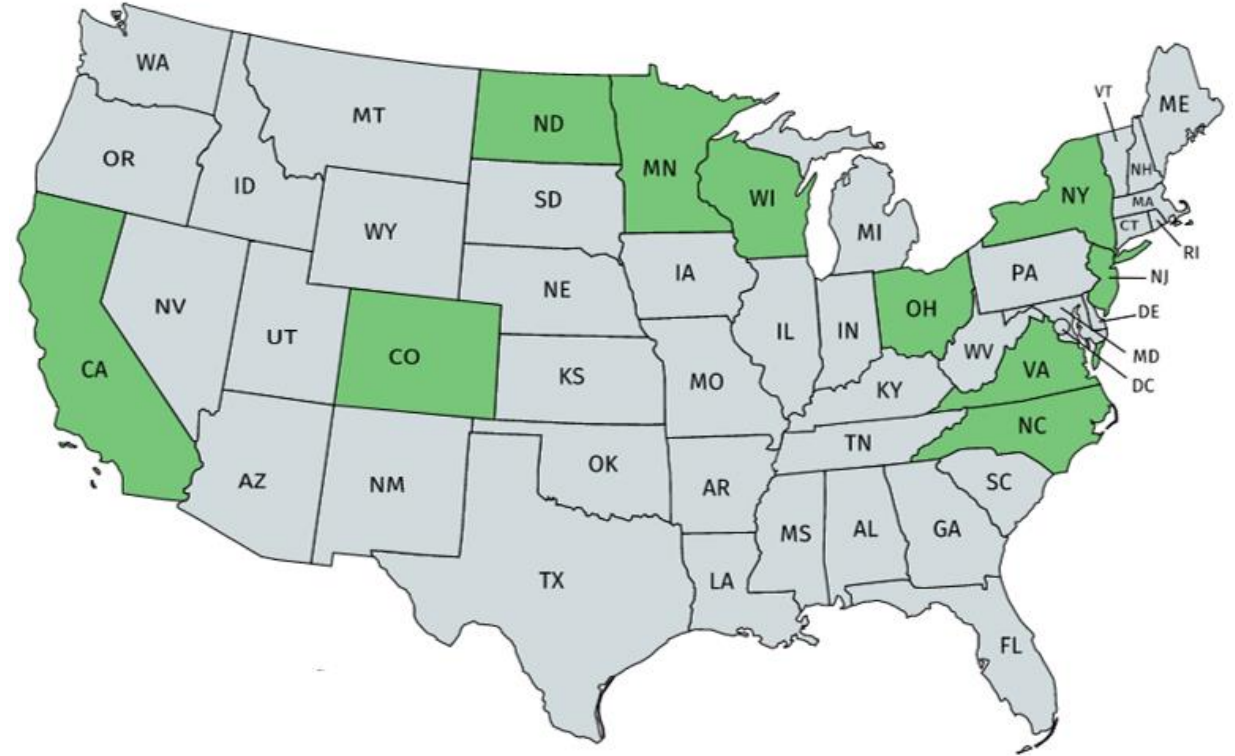


# Key Informant Interviews



# What is a County-Administered State?

- 10 states are considered “state-supervised, county-administered”
- ~30% of SNAP recipients nationwide live in a county-administered state
- Single unifying definition: SNAP enrollment process conducted by **county** employees in **county-run** offices
- Wide range of flexibility provided to counties on business processes (i.e. how to organize workflow)



State-Centric

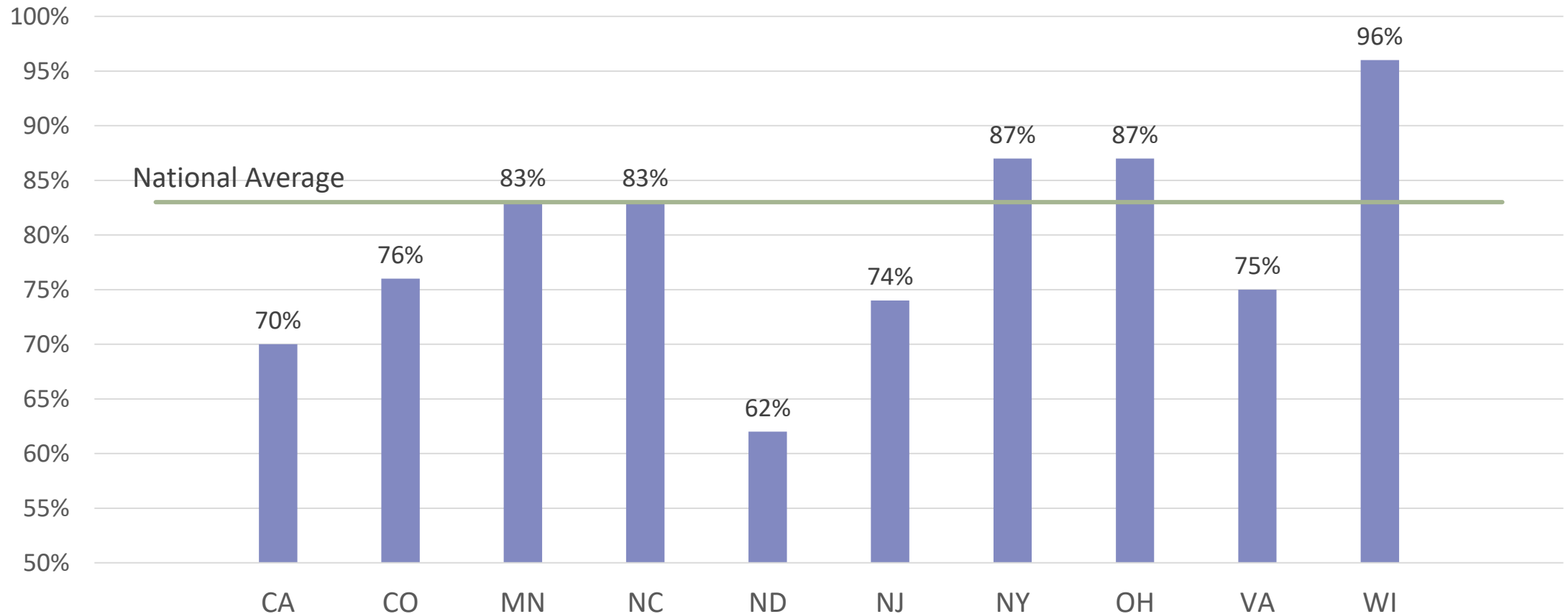
SPECTRUM

County-Centric

# BIG PICTURE:

*How well do County-Administered States perform compared to other states?*

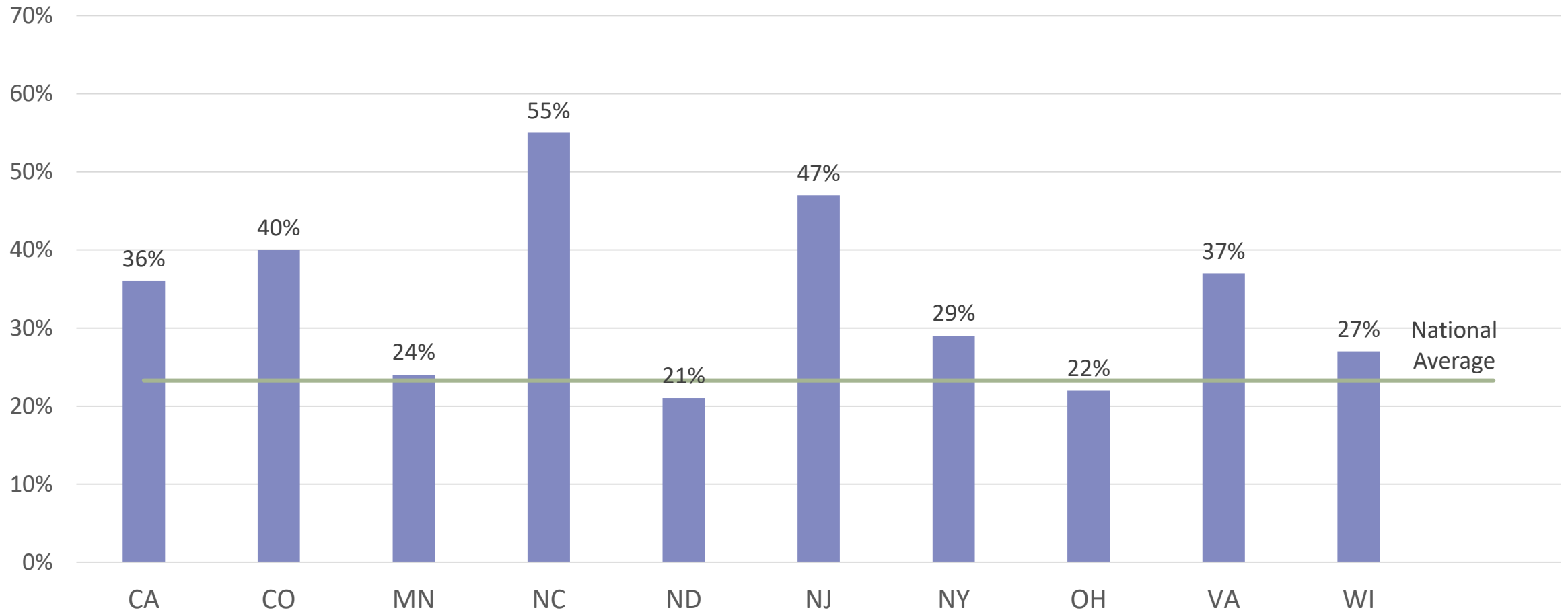
SNAP Participation Rate - FY 2015



# BIG PICTURE:

*How well do County-Administered States perform compared to other states?*

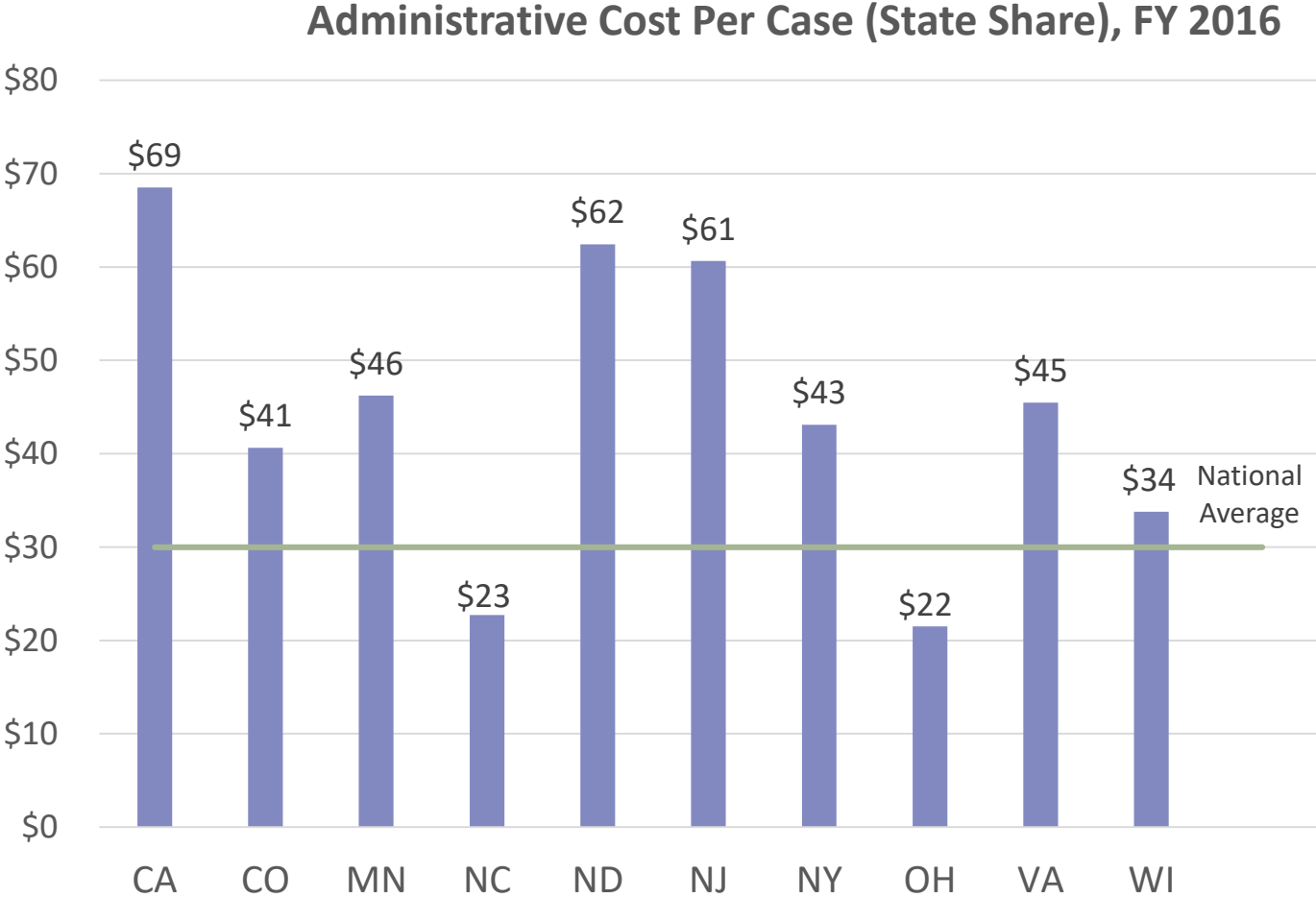
**CAPER Rate - FY 2015**



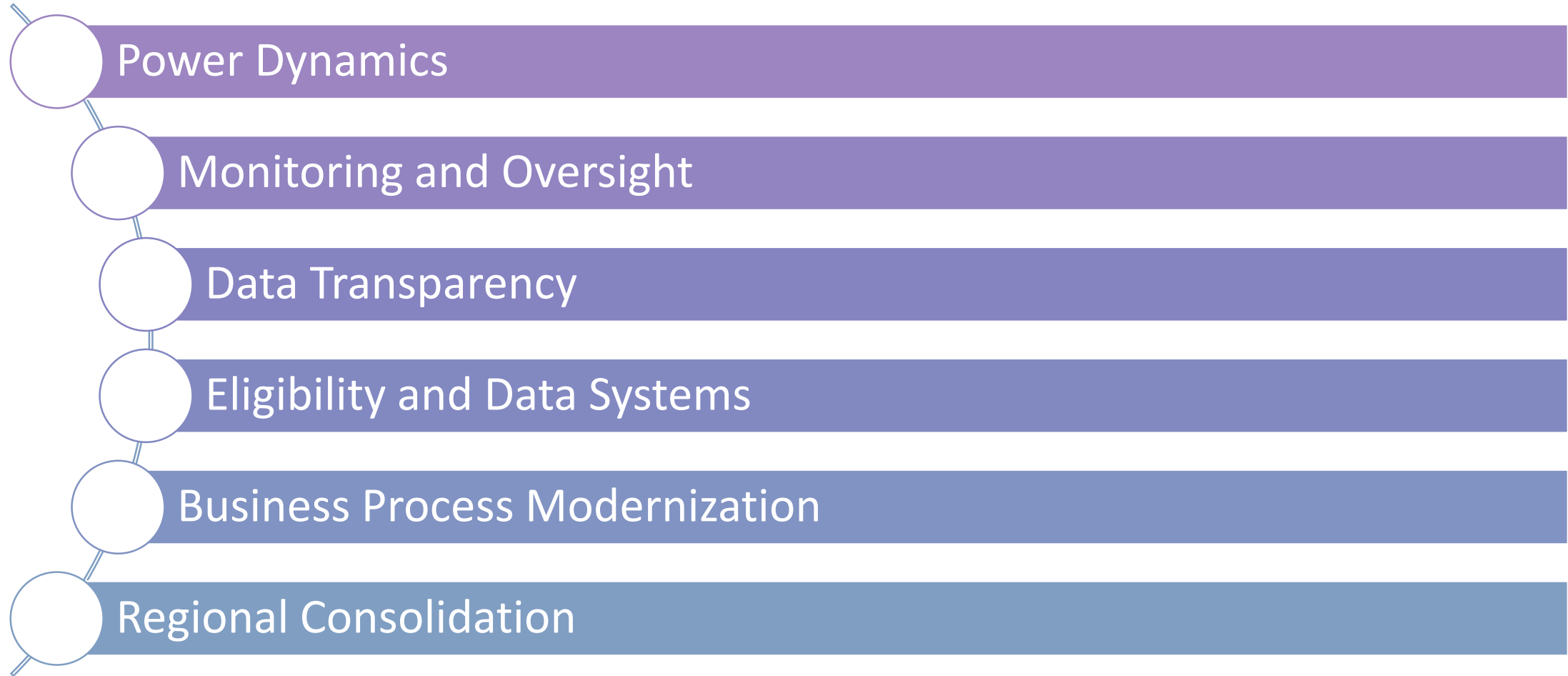
# How much do county-administered states spend on SNAP administration?

STATE	# of Counties	HH Caseload	Admin Costs
CA	58	2.1M	\$1.7 B
CO	64	225K	\$110 M
MN	87	231K	\$128 M
NC	100	762K	\$208M
ND	53	25K	\$19M
NJ	21	440K	\$320M
NY	62	1.6M	\$846M
OH	88	794K	\$205M
VA	95	388K	\$211M
WI	72	360K	\$146M

<https://fns-prod.azureedge.net/sites/default/files/snap/FY16-State-Activity-Report.pdf>



# Focus Areas



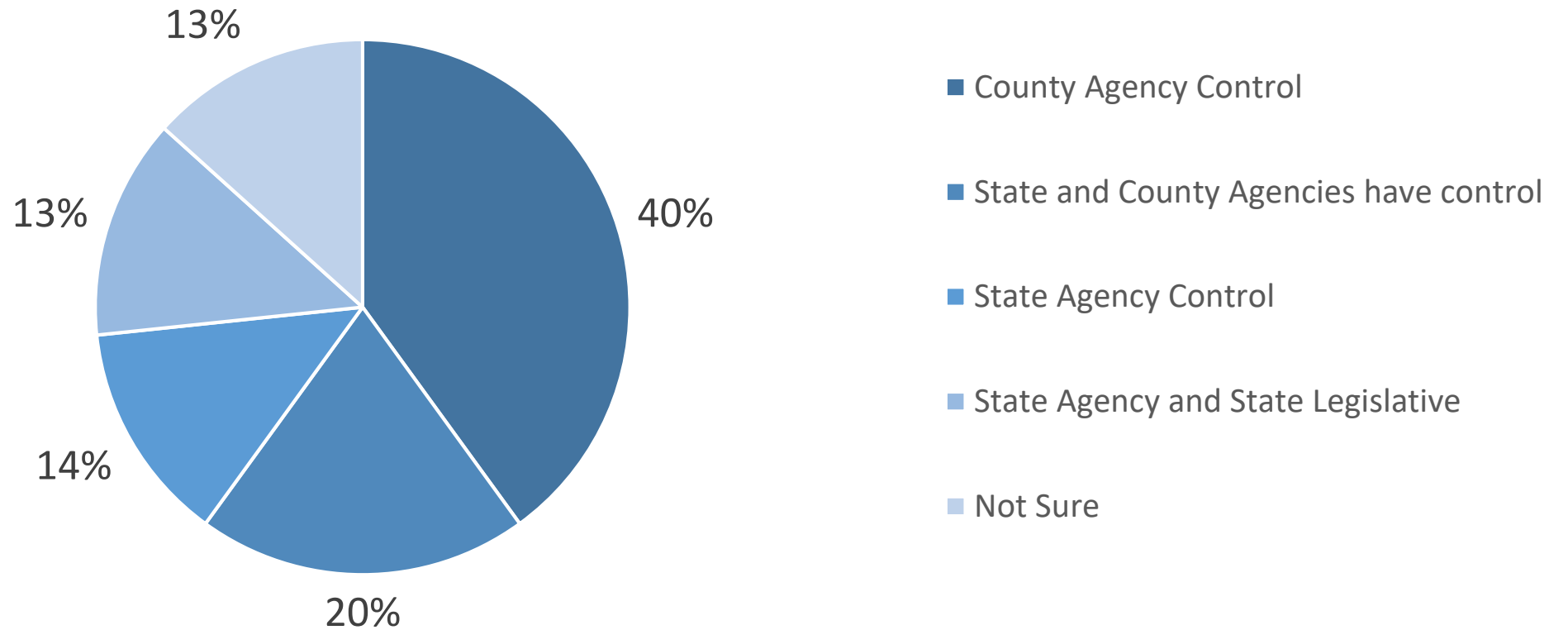


# Power Dynamics:

*Survey said...*

Power Dynamic between State and County Officials

n=15



# Power Dynamics:

*Interviewees said...*

	Executive Branch Control	Legislature Control	County Agency / Consortia Control
CA	✓	✓	✓
CO	✓		✓
MN	✓		
NC	✓	✓	
ND	✓		
NJ	✓		
NY	✓		✓
OH	✓		✓
VA	✓		
WI	✓	✓	

# Power Dynamics:

## *Examples*

### Executive

- New Jersey's R Governor vetoed Heat and Eat
- North Carolina's former D Governor's Cat El expansion

### Legislative

- Wisconsin's legislature moved their state to regional operating models

### County

- New York City and Minneapolis held to different standards and operate more independently.

# Power Dynamics:

## *Administrative Cost Sharing*

	State Provides All	State/Counties Each Provide a Portion	Counties Provide All
CA		✓	
CO		✓	
MN			✓
NC			✓
ND*	✓		
NJ			✓
NY		✓	
OH	✓		
VA		✓	
WI		✓	

# *What can stakeholders do?*

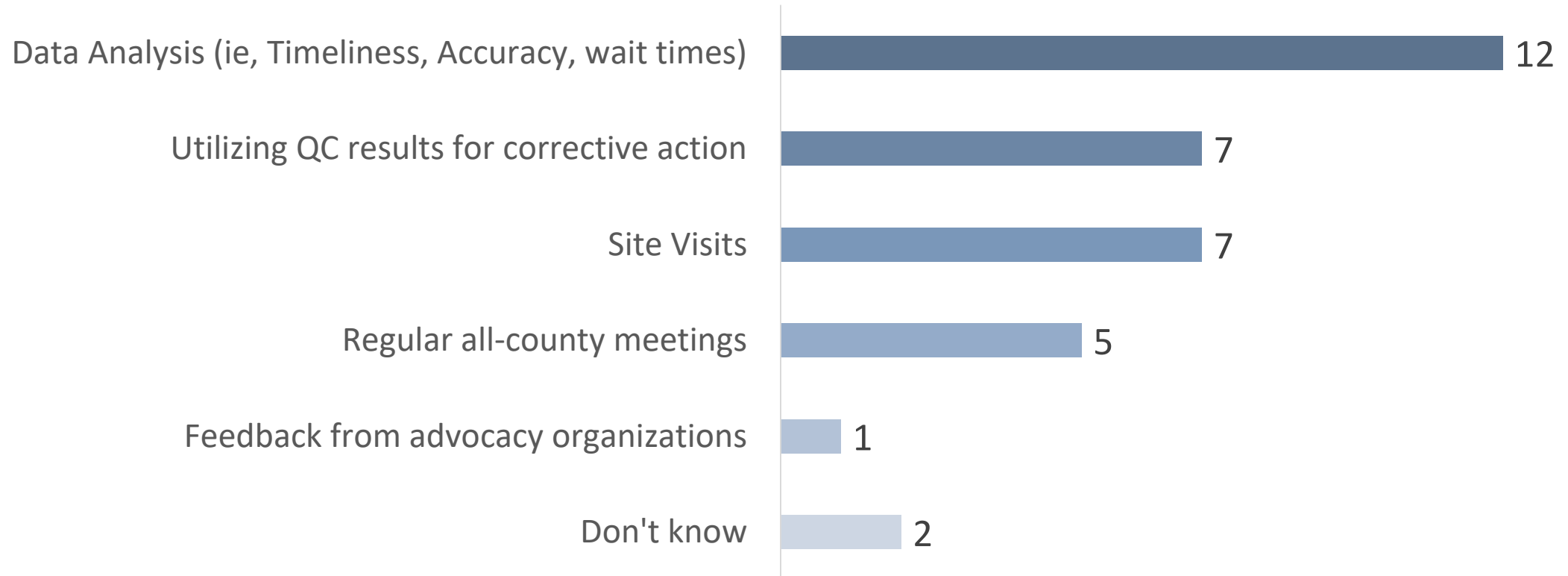
- ✓ Create a **power map** to clarify which policymakers have the most influence over SNAP policy decisions
- ✓ Build **relationships and alliances** with county influencers (e.g. County Directors Association)
- ✓ Understand **financial implications** for county governments associated with various operational decisions. Look for opportunities where the most cost-effective solutions also increase client access and improve the client experience.

# Monitoring:

*Survey said...*

How does the State SNAP Agency monitor county performance?

n=15



# Monitoring:

## *Basic Definitions*

- **Quality Control Reviews**

- Primary tool to determine accuracy of eligibility determinations and benefits issuances
- Small statistical sample required by FNS:
  - “Active Cases”
    - Determines “payment error rate” which *adds* overpayments and underpayments
  - “Negative Cases”
    - Determines “case and procedural error rate” (CAPER)

- **Management Evaluations**

- Monitoring local agency operations
- Review of local agency financial and participation reports
- On-site visits
- Development of corrective action plans to resolve deficiencies
- Monitoring of the implementation of corrective action plans

# Monitoring:

## *Examples*



- State field reps are stationed in county offices to provide technical assistance; Separate from QC, ME, and Program Integrity Units



- 15 staff dedicated to QC and 7 staff performing MEs; Outside policy chain of command



- A 4-person ME team and 9-person technical assistance team (helps address operational issues; assists counties with BPR)



# Oversight:

*What statutory authority do states have over counties?*

State authority to take over county operations, at county's expense

- New Jersey
- Wisconsin

Counties liable for federal sanctions

- Ohio
- Colorado
- Minnesota
- New York\*
- North Carolina
- California
- North Dakota

Unknown

- Virginia

# Oversight Citations

- California: [https://leginfo.legislature.ca.gov/faces/codes\\_displayexpandedbranch.xhtml?tocCode=WIC&division=9.&title=&part=&chapter=&article=](https://leginfo.legislature.ca.gov/faces/codes_displayexpandedbranch.xhtml?tocCode=WIC&division=9.&title=&part=&chapter=&article=)
- Colorado – Volume IV <https://www.sos.state.co.us/CCR/NumericalAgencyList.do?&deptID=9&deptName=Department%20of%20Human%20Services>
- New York - <http://codes.findlaw.com/ny/social-services-law/sos-sect-20.html>
- New Jersey – NJ Code Title 10 Ch 87  
<https://advance.lexis.com/container?config=00JAA5OTY5MTdjZi1lMzYxLTQxNTEtOWFkNi0xMmU5ZTViODQ2M2MKAFBvZENhdGFsb2coFSYEAfv22IKqMT9DlHrf&crd=85fa9bdb-50ee-44e2-87f7-3d512d482178&prid=46feba43-4418-4b24-8e66-877fc45094a5#>
- North Carolina - [https://www.ncleg.net/EnactedLegislation/Statutes/HTML/ByChapter/Chapter\\_108A.html](https://www.ncleg.net/EnactedLegislation/Statutes/HTML/ByChapter/Chapter_108A.html); 2017 law at <https://www.ncleg.net/Sessions/2017/Bills/House/PDF/H630v6.pdf>
- North Dakota <http://www.legis.nd.gov/information/acdata/html/75-01.html>; 2017 law at [https://legiscan.com/ND/text/2206/id/1599931/North\\_Dakota-2017-2206-Enrolled.pdf](https://legiscan.com/ND/text/2206/id/1599931/North_Dakota-2017-2206-Enrolled.pdf)
- Ohio - <http://codes.ohio.gov/oac/5101:9-32-10v1>
- Minnesota - <https://www.revisor.mn.gov/statutes/?id=256.017>
- Wisconsin - [https://docs.google.com/document/d/1civLf34Hag7jo713Z28vwf3xavAx7OCtjG\\_GkXR6l8/edit](https://docs.google.com/document/d/1civLf34Hag7jo713Z28vwf3xavAx7OCtjG_GkXR6l8/edit)
- Virginia – <https://law.lis.virginia.gov/admincode/title22/agency40/>

# *What can stakeholders do?*

- ✓ **Review quality control data** over time, including both timeliness and payment accuracy. Ask for or develop plans for improving measures that are below the national average.
- ✓ Review quality control data **at the county level** for the most recent Fiscal Year. Advocates, use a Freedom of Information Act (FOIA) request, if necessary.
- ✓ Review any open **corrective action plans** for struggling counties. Consider meeting with county leadership to discuss target areas for improvement.
- ✓ Review your state's legal authority to impose sanctions and/or take over local operations at the county's expense. Advocates, consider encouraging your state agency to **make better use of existing language**, or if none exists, introducing helpful oversight language through the state's legislative or regulatory processes.

# Data Transparency

*Data commonly available for states and (sometimes) counties:*

- Participation and benefit amounts
- Application timeliness rates
- Payment error rates
- Case and procedural error rates
- Customer service metrics

## Published

- California
- New Jersey
- North Carolina

## Available upon request

- Colorado
- Minnesota
- North Dakota
- Virginia
- Wisconsin

## Not easily available

- New York
- Ohio

# Data Transparency:

## *Examples*

States that publish data and set performance targets can leverage “healthy competition” among counties even without formal requirements

CA

- Online dashboard with various performance measures
- Able to compare the performance of various counties
- Somewhat clunky and not updated frequently enough

CO

- The State has established targets based on national trends

NY

- Compliance/performance lawsuits that trigger oversight from advocacy organizations have led to long term and systemic improvements

# *What can stakeholders do?*

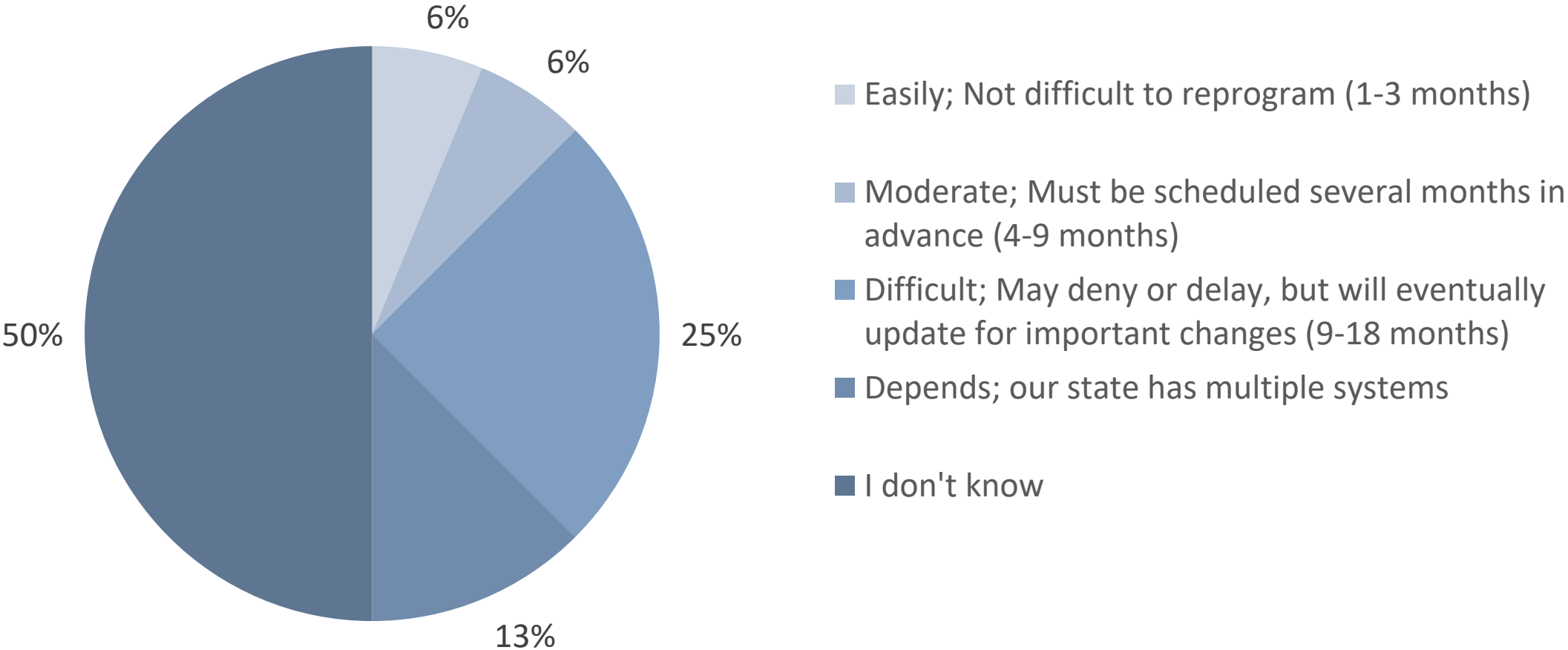
- ✓ Share county-level performance data, at least internally, to promote **healthy competition**
- ✓ Advocates, **build relationships** with state agency leaders and put data requests near the top of your agenda
- ✓ Share examples of successful “**data dashboards**” from peer states with state agency leaders to encourage more data transparency
- ✓ Consider **partnering with local university** or other entity to support a more detailed analysis of data requested from state or county agencies

# Eligibility and Data Systems

*Survey said...*

How quickly/easily is the SNAP IT vendor able to make updates based on policy/process?

n=15



# Eligibility Systems:

## *Updates and Integration*

State	New, Fully Integrated System	New Medicaid Only	Modified existing SNAP/TANF	Integrated Medicaid/SNAP/TANF
CA		X	X	X
CO			X	X
MN		X		
NJ			X	
NY		X	X	
NC	X			X
ND		X	X	
OH	X			X
VA	X			X
WI			X	X



# Data Systems (SNAP)

## Single System

- Colorado
- Minnesota
- North Carolina
- North Dakota
- Ohio
- Virginia
- Wisconsin
- New Jersey

## Multiple Systems

- California
- New York

# Eligibility and Data Systems:

## *Examples*

CA

Three eligibility systems and is working toward migration to one system with possible integration. Advocates are currently strategizing about how to have a seat at the table to influence the governance, design, and migration processes.

OH

The first state to go through a required process mandated by FNS's Major Change Rule: they must pilot their rollout with a certain percentage of their caseload.

NY

New York City operates very independently and the state has a more difficult time reviewing their information than the "upstate" system, to which it has direct access to data.

# FNS Major Changes Rule

- **In January 2016, FNS published “Review of Major Changes in Program Design and Management Evaluations Final Rule” saying States must:**
  - Notify FNS if they plan to implement a “major change in operations”
  - “Collect and report data that can be used to identify and correct problems relating to integrity and access, particularly for certain vulnerable households”

<https://www.fns.usda.gov/snap/fr-011916>

- **Examples of major changes subject to FNS rule include:**
  - “Replacement of the State’s automated systems used in the certification process”
  - “Adding functionality to the existing automated system used in the certification process”
  - “Changes in the way applicants and participants interact with SNAP”
- **States subject to the Major Changes Rule must provide FNS:**
  - “Description of the change and an analysis of its anticipated impacts on program performance”
  - “Evaluation of the impact of the change [on] key performance metrics such as payment error, negative error, timeliness and program access/customer service”

<https://fns-prod.azureedge.net/sites/default/files/Major-Change-Rule-Implementation-Memo-1-19-2016.pdf>

# *What can stakeholders do?*

- ✓ **Build your IT vocabulary** by learn the names of your state's eligibility system(s) and where case data gets stored, as well as the process by which data requests are fulfilled.
- ✓ If your state is considering a new eligibility system for SNAP, **request a seat** at the governance table, or a process for advocates to get updates and provide input.
- ✓ If your state is subject to FNS' Major Changes Rule, **request a copy** of the project description, vendor information, impact analysis, and quarterly reports prepared for FNS.
- ✓ During the implementation of a new system (including pilot phases), leverage community networks to **closely monitor the impact of changes** on customer service levels and client outcomes.

# Business Processes:

## *Call Centers*

### State Only

- Virginia

### State and County

- Minnesota
- New York
- Wisconsin\*

### Counties Only

- California
- Colorado
- New Jersey
- North Dakota
- North Carolina
- Ohio

# Business Processes:

## *Modernization*

### Case Banking

- At least one county in each state

### Online Case Information

- California
- Colorado
- New York
- North Dakota
- Ohio\*
- Virginia
- Wisconsin

### IVR Call Center

- California
- New York

### Texting

- California
- New York
- North Dakota

# Modernization:

## *Examples*

NY

New York City allows certain HHs to complete their recertification through an automated IVR process over the phone.

CA

Some counties have established text reminders to their participants for verifications or recert reminders; the text programs may be run by the county directly or by a 3<sup>rd</sup> party.

OH

A pilot phase was just launched to add SNAP/TANF to newer online Medicaid system.

# Business Processes:

## *Eligibility Worker Training*

### State-led Training

- Wisconsin

### State and County-led Training

- Colorado
- Minnesota
- New York
- North Carolina
- North Dakota
- Virginia

### County-led Trainings

- California
- New Jersey
- Ohio

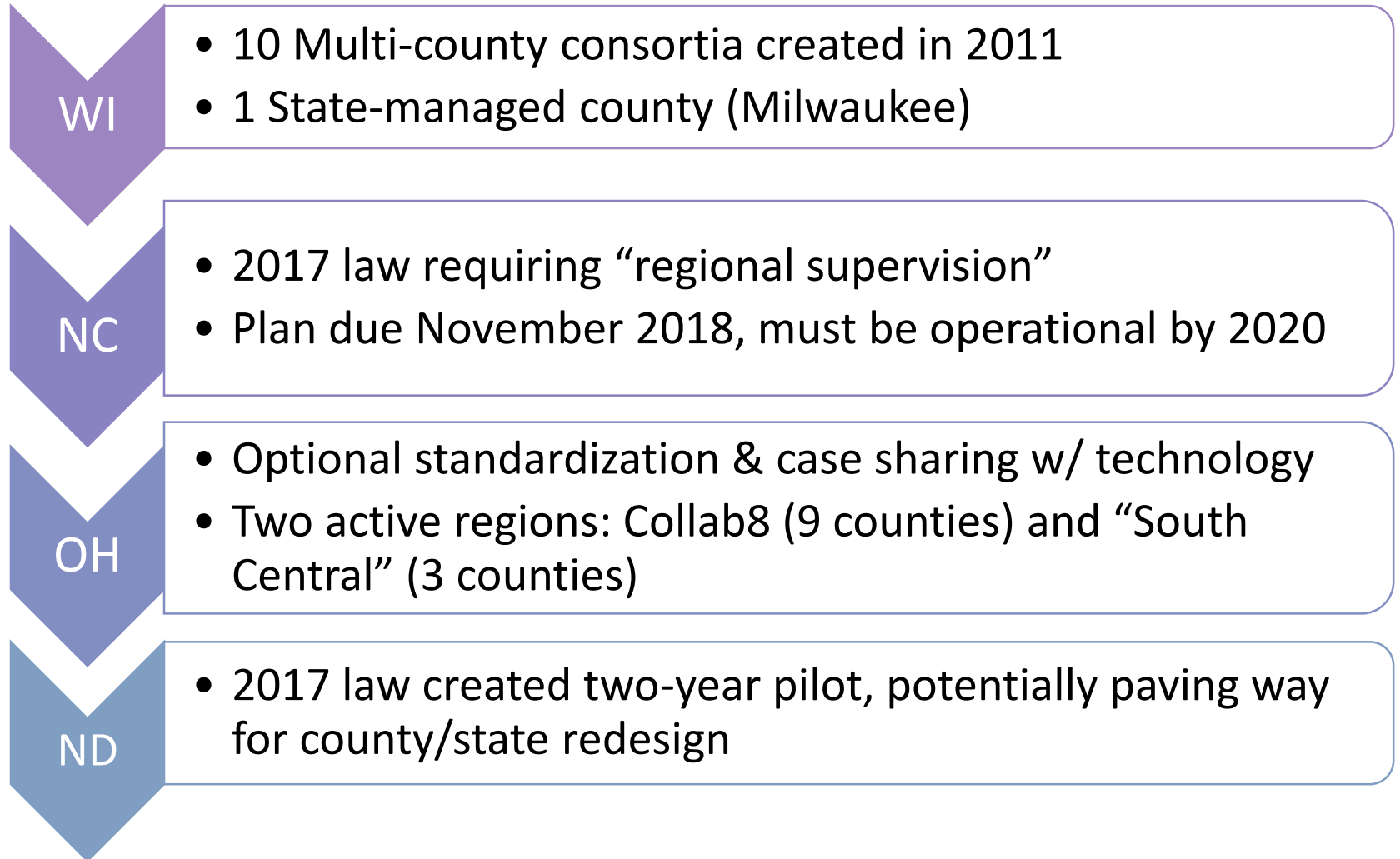


# *What can stakeholders do?*

- ✓ **Identify promising practices and cautionary tales** of modernization with your state leadership to ensure state and county investments are in the best interest of consumers.
- ✓ **Keep client privacy protections and technology limitations in mind** as you work with your state to design technology-based solutions to long-standing access problems.
- ✓ Insist that modernization efforts designed to increase access for applicants (e.g. new call centers) **do not result in limited client access to face-to-face options** which are particularly important for certain vulnerable populations.
- ✓ Ask your state and counties how they incorporate **effective teaching techniques** for adult learners and what standards they have in place to ensure trainings are effective.

# Regional Consolidation

States who want to move away from county-based control without full centralization are experimenting with regional models.



# *What can stakeholders do?*

*Some questions for stakeholders to raise as their states consider regional consolidation include:*

- ✓ What are the core goal(s) of regional consolidation in our state?
- ✓ What are the risks of consolidation on client access? How can the state ensure that SNAP applicants and recipients will be better off in the new system?
- ✓ Which functions of SNAP administration are well-suited for consolidation and which ones should remain at the local level?
- ✓ What reporting metrics will be developed to ensure proper oversight and transparency of regional leadership? Access metrics should still be reported at the local office/county level.
- ✓ What best practices and lessons learned can be gleaned from first adopters, like Wisconsin?



# Questions and Discussion

# Contact Information



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