

Data Requests in County-Administered States

All states see varying degrees of SNAP performance across regions, but the variation is often greatest in county-administered states. Data analysis offers advocates an opportunity to better understand *county-level differences* in performance, leading to more effective engagement with agency leaders to pursue improvement.

This document provides recommendations for:

- How advocates can request data from SNAP administrators
- The types of policy analysis to develop
- Examples of data dashboards of county data
- Considerations for data requests, analysis and utilization for SNAP advocacy

Best Practices for Submitting Data Requests

Relationships are at the heart of productive data exchanges, but you do not need an established relationship with your state's SNAP administrators to get started. Once you get in contact with the appropriate administrator, advocates can formally or informally request program data.

- ✓ Reach out via phone or in person to your contact to discuss the data request, since administrators can guide you based on what data they know to be available.
- ✓ Be specific in the metrics and analysis you want. Request county-level data whenever possible.
- ✓ Some state administrators need you to submit a formal Public Records Act (PRA) or Freedom of Information Act (FOIA) Request in order to share information. If this is new to you, most states have websites outlining the process and linking to request forms.
- ✓ Include a template (e.g. spreadsheet with data points indicated, ready to be filled in) for the state's data analyst. This will increase your chances of getting the types of data you want.
- ✓ Request raw, de-identified data tables along with any charts or summaries.
- ✓ Use the raw data tables to perform further analysis and dig deeper into the data to guide advocacy and intervention strategies. Even raw data tables that aggregate information at the county or zip code level can be used for additional analyses.
- ✓ Be aware that states may be unable to share even de-identified client or household level data due to privacy concerns, depending on the details of the variables requested.

Data Type	What It Measures	How to Use It
Program Access Index	<p>Developed by USDA's Food and Nutrition Service (FNS) as a state-level measure of the percentage of eligible individuals enrolled in SNAP</p>	<p>Can be used to compare SNAP participation across counties. For further interpretation from California Food Policy Advocates, see https://cfpa.net/pai-2015/. California uses an alternate to PAI (called Program Reach Index) that better adjusts for undocumented populations. See http://www.cwda.org/sites/main/files/file-attachments/calfreshpriwebinar120115.pdf</p>
Timeliness	<p>This analysis shows the percentage of applications that are determined timely (30 days or less for regular applications and 7 days+ or less for expedited applications).</p> <p><i>*Some states may mandate a shorter expedited period.</i></p>	<p>Timeliness analysis provides information on how well individual counties process their applications.</p> <p>By identifying counties based on their timeliness rates, stakeholders can then explore the strategies, business processes, or technologies that may help make a county more effective at timely processing.</p>
Active (or Payment) Error Rate*	<p>The Active Error Rates measures the accuracy of the benefit amount issued to the participant. This measures the accuracy of case benefits, not a tally of the number of cases in error.</p> <p>States may face financial sanctions if their Active Error Rate exceeds the federal target, so counties and states pay close attention to this metric.</p>	<p>Comparing Active Error Rates across counties can help identify where to start looking for ways to improve a county's performance.</p>
Case and Procedural Error Rate (CAPER)*	<p>The CAPER measures the rate at which applicants are incorrectly denied or have their benefits terminated. It also includes procedural errors such as not sufficiently documenting reasons for the denial, unclear wording in notices to the recipient, denying the application before 30 days, or failure to offer expedited service.</p> <p>States do not face financial sanctions if their CAPER exceeds the federal limit.</p>	<p>The CAPER rate offers insight into how well a county is processing cases. Because the CAPER rate includes a variety of different types of negative case errors, use the measure as a starting-point to explore the most frequent or impactful types of errors and how they can be mitigated.</p>

*Active Error and CAPER rates are based on county-level samples that can be very small. Consider the sample size when reviewing county level metrics.

Data Type	What It Measures	How to Use It
Application Outcomes	<p>This analysis shows SNAP application outcome rates by county including: procedural denials, ineligibility denials, withdrawals, and approvals.</p> <p>Note: Some states may use different terms for the application outcomes.</p>	<p>Similar to churn rates, the procedural denials rates provide an opportunity to see which counties have higher rates of administrative denials that could be addressed through business process changes or expanded efforts to support SNAP-eligible households through the application process.</p> <p>See this ACL describing the application outcomes report (CF-296), and link to the newest data gathered via the CF-296 from California's counties:</p> <p>http://www.cdss.ca.gov/lettersnotices/entres/getinfo/acl/2016/16-14.pdf</p> <p>http://www.cdss.ca.gov/inforesources/Research-and-Data/CalFresh-Data-Tables/CF296</p>
Churn Rates	<p>This analysis estimates the number of households that lose their SNAP benefits for administrative reasons (not because they no longer qualify) and then re-apply within 30, 60, or 90 days.</p>	<p>Churn most often happens during semi-annual reporting or recertification/renewal periods and can lead to redundant paperwork and processes that can be costly for both the household and the SNAP office.</p>
Program Growth Overall and by Region	<p>This analysis measures the rates of growth or decline in SNAP participation broken down by year and county.</p>	<p>Program Growth shows where participation rates have changed and can be used comparatively to explore what point-in-time policies, practices or other changes that may have impacted rates of growth.</p> <p>For example, counties that implement a targeted in-reach plan may be able to correlate the program participation changes to rates of in-reach success.</p>
Dual Enrollment	<p>This analysis measures the rates of individual enrollment with both SNAP and another means-tested program such as Medicaid, WIC, or school meals.</p>	<p>Dual Enrollment rates provide a window into well counties connect individuals with the resources they may qualify for.</p> <p>For example, by using Medicaid aid codes to identify individuals that may be most like to qualify for SNAP, county administrators can develop targeted interventions to improve enrollment between programs.</p> <p>If an aid code level analysis is not available for Medicaid, it is still possible to review dual enrollment rates among all Medicaid clients, though expected maximum overlap between the programs will be lower.</p>

Data Type	What It Measures	How to Use It
Case Discontinuances (or Closures)	<p>Discontinued cases typically fall into several categories:</p> <ul style="list-style-type: none"> - Cases determined ineligible after completing recertification or mid-period reporting - Cases discontinued when participants do not complete recertification or mid-period reporting. These discontinuances may be rescinded or have benefits prorated in the following month if they complete reporting within a short window of time - Expedited service households discontinued due to failure to complete the application - Cases discontinued due to failure to demonstrate exemption from or failure to fulfill ABAWD work requirements - Inter-county transfers - Other mid-period discontinuances 	<p>Discontinuance analysis provides another look at case outcomes and opportunities for intervention that may reduce churn and improve access for SNAP-eligible households.</p> <p>Adding in further analysis such as comparison to unemployment rate or the discontinued cases that were initially expedited service cases provides greater context when considering interventions.</p>

Improvement Strategies and Incentives

Data is only as powerful as what it is used to understand and accomplish. A goal of engaging states and counties with data must be the improvement of outcomes for those in need of assistance.

- **PUBLISHING METRICS:** States that publish performance data report that data is part of an ongoing, transparent conversation about opportunities for improvement. The data may be published publicly or internally for county administrators, both of which can create “healthy competition” between counties and encourage counties to share best practices.
- **PERFORMANCE TARGETS:** Some states have developed performance targets or benchmarks based on national and statewide performance averages related to Payment Error Rates, CAPER Rates, Timeliness, Churn, and/or Dual Enrollment. Creating targets gives counties a goal to work towards in their efforts for administrative excellence. Including executive leadership from counties in finalizing targets can strengthen the commitment of counties to work towards these goals. If financial bonus awards are offered for counties that show the most improvement, the formula should favor counties that show across-the-board improvements (not just a focus on one area to the detriment of others). Performance should also be reviewed for sub-populations (e.g. race/ethnicity, non-English speakers, various household compositions) in order to ensure that improvements benefit a diverse community.

Examples: Data Dashboards

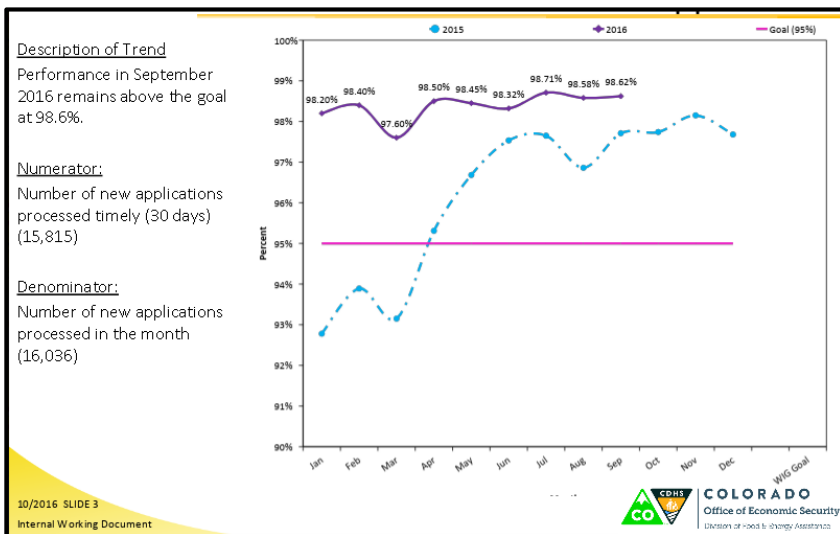
North Carolina's Caseload Statistics

This dashboard provides links to program integrity, caseload statistics, timeliness, and case outcome information broken down by county. <https://www2.ncdhhs.gov/dss/stats/fsp.htm#case>

Colorado CStat Caseload Statistics

The goal of the C-Stat is to collect timely data and improve transparency. The information shared by Colorado includes timeliness data, PER and CAPER rates.

<https://www.colorado.gov/pacific/cdhs/data-economic-security>

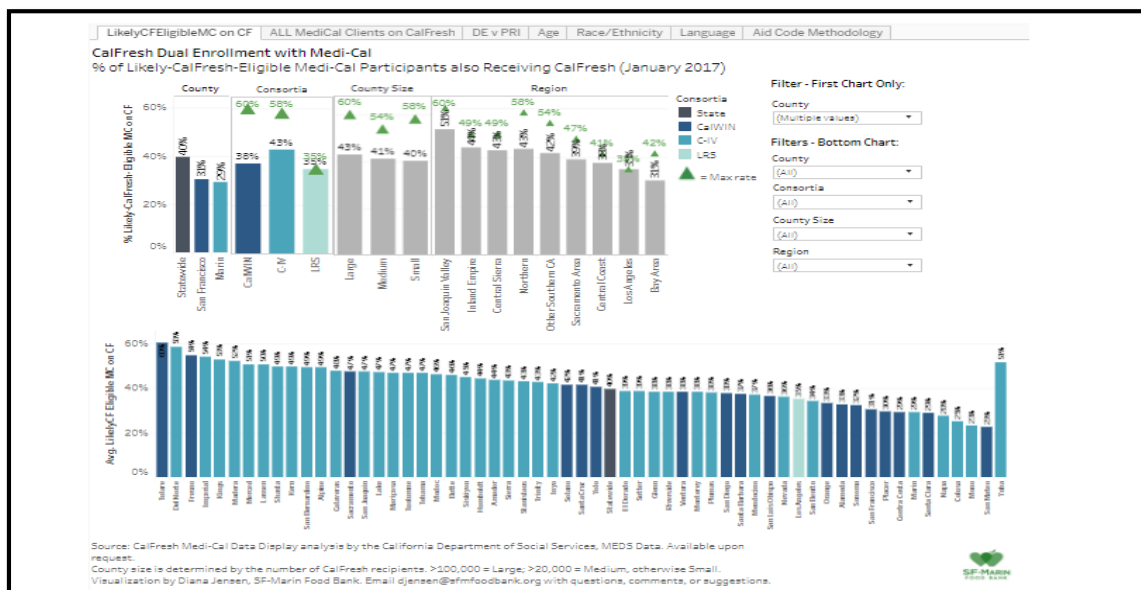


California Data Dashboards

This dashboard publishes updated information at least a few times per year with trend analysis on SNAP/CalFresh demographics, participation rates, timeliness, benefit accuracy and churn rates by county.

<http://www.cdss.ca.gov/inforesources/Data-Portal/Research-and-Data/CalFresh-Data-Dashboard>

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Considerations for Developing and Publishing Data

Utilizing data analysis for advocacy work is an important opportunity to create evidence-based recommendations and grow the effectiveness of campaigns. When employing data-driven analysis consider these strategies:

- ✓ As data becomes more widely utilized, advocates that develop their own data expertise (i.e. hiring or contracting an experienced data analyst) will have an added edge in understanding trends and identifying opportunities for intervention that can be shared with state and county administrators.
- ✓ An advocate data analyst can develop a relationship with a state's data department in order to accomplish shared goals with data analysis.
- ✓ Offer the state the opportunity to review any reports or analysis for accuracy before publication. This will reassure them that the data will not be misrepresented or manipulated and strengthen the long-term relationship with advocates.
- ✓ Data requests should include an ask for raw data and for breakdowns of information by race, ethnicity, and language.
- ✓ Advocates should consider the political climate as they determine how widely to publish data analysis versus using it internally for developing strategies and recommendations.
- ✓ Data analysis may reveal inconsistencies in data collection, data definitions, or data queries by county. While this can be frustrating, surfacing these types of issues can ultimately lead to improved data quality in the long term.

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