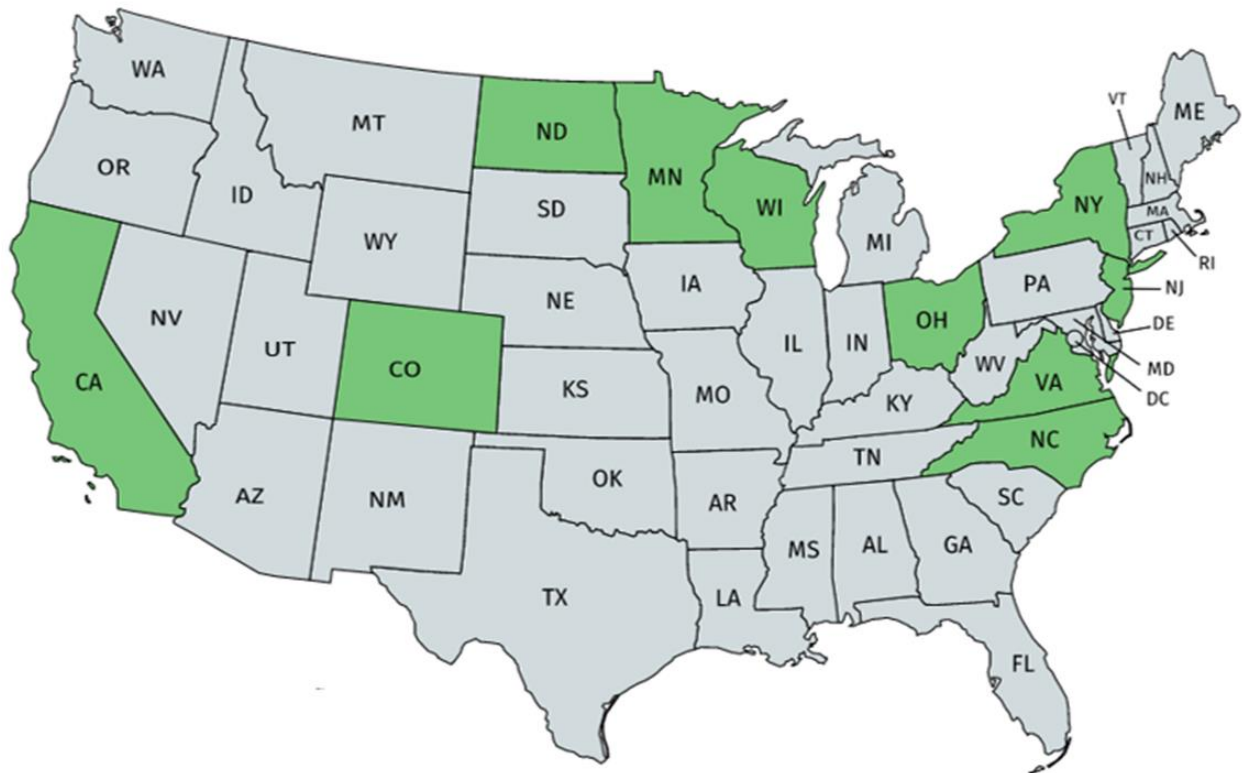


TEN DEGREES OF DECENTRALIZATION:

OVERVIEW OF SNAP OPERATIONS IN COUNTY-ADMINISTERED STATES



APRIL 2018

TABLE OF CONTENTS

About this Report	3
Executive Summary	4
Introduction.....	5
What is a “State-Supervised, County-Administered” State?	5
Why should SNAP advocates care that their state is “county-administered”?	6
Methodology	8
Findings.....	8
How well do county-administered states perform compared to national averages?	8
Power Dynamics	11
Monitoring and Oversight	13
What are Quality Control Reviews?.....	13
What are Management Evaluations?	14
What enforcement tactics can states employ when counties do not improve?	15
Data Transparency.....	16
Eligibility and Data Systems	18
Business Process Modernization	19
Worker Training.....	21
Regional Consolidation	23
Recommendations for Future Research	25
Appendix: Statutory Oversight Language	28

ABOUT THIS REPORT

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The observations of SNAP operations in county-administered states described in this report are the authors alone and do not represent the views of the California Association of Food Banks, its board members, or its funders. Any errors or omissions in this report are the sole responsibility of the authors.

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EXECUTIVE SUMMARY

The Supplemental Nutrition Assistance Program (SNAP) is the nation's most important anti-hunger program, providing over \$63 billion in food resources to more than 42 million people in fiscal year 2017.¹ Although SNAP benefits are 100% federally-funded, the program is administered by state human services agencies, with oversight from the U.S. Department of Agriculture's Food and Nutrition Service (FNS). In ten states, SNAP administration is further decentralized with individual county governments – rather than the state government – responsible for faithfully implementing the program. The ten states considered to be “state-supervised, county-administered” by FNS are California, Colorado, Minnesota, North Carolina, North Dakota, New Jersey, New York, Ohio, Virginia, and Wisconsin. Approximately 30% of SNAP recipients nationwide reside in a county-administered state.²



APPROXIMATELY 30% OF SNAP RECIPIENTS NATIONWIDE RESIDE IN A COUNTY-ADMINISTERED STATE.

The preliminary research effort described in this report sought to better understand how SNAP operates in these ten county-administered states, primarily to assist state-based advocates who are working to improve access to SNAP at the local level. This research was conducted over four months and included a survey and key informant interviews with experienced advocates and SNAP administrators in all ten states, as well as background research on each state. Findings from this research are organized in this report under six different focus areas – Power Dynamics, Monitoring and Oversight, Data Transparency, Eligibility and Data Systems, Business Process Modernization, and Regional Consolidation. Information was more readily available from some states and topics than others, so the information provided in this report should not be considered exhaustive.

The single unifying characteristic of the ten county-administered states is that SNAP enrollment – including application processing and eligibility determination – is the responsibility of county employees in county-operated offices, rather than state employees in state-operated offices. Other than this defining feature, county-administered states are incredibly diverse, and no two states have made the same set of policy and implementation choices for SNAP. On national performance metrics, like the SNAP participation rate, county-administered states represent some of the highest and lowest performers. Compared to the national average, county-administered states have higher case and procedural error rates and higher administrative costs-per-case.³

Stakeholders in county-administered states face unique circumstances when seeking systemic changes that could improve access to SNAP for vulnerable populations. For instance, although the most common barriers to SNAP are not unique to county-administered states, the strategies that change-makers employ – i.e. how stakeholders must approach and solve a problem – often do differ from the strategies used in state-administered states. Furthermore, some barriers to SNAP, such as inconsistent policy implementation and/or wildly different customer experiences based on county of residence, are bigger challenges for stakeholders in county-administered states to tackle. Throughout this report, stakeholders will find suggestions designed for county-administered environments. State administrators may want to implement these recommendations directly; advocates may want to work with their local and state partners to encourage, advise, and/or support implementation of these recommendations. The report closes with recommendations for future research into these topics to benefit SNAP stakeholders inside and outside of government.

¹ FY 2017 participation data from the U.S. Department of Agriculture's Food and Nutrition Service. Available at <https://www.fns.usda.gov/pd/supplemental-nutrition-assistance-program-snap>.

² Based on September 2017 state-level data. Available at <https://www.fns.usda.gov/pd/supplemental-nutrition-assistance-program-snap>.

³ Two states have lower case and procedural error rates (OH, ND) and lower administrative costs-per-case (OH, NC) than the national average.

INTRODUCTION

In 2016, SNAP advocates in several county-administered states began informal conversations about the lack of comprehensive information available about the unique environments they work in. These advocates formed an ad-hoc group to discuss potential opportunities to develop a comparative state analysis, leading to a funding proposal spearheaded by the California Association of Food Banks. In September 2017, funding for the project was generously provided by the Center on Budget and Policy Priorities and the Center for Law and Social Policy.


The purpose of this report is to share findings from initial research into the unique characteristics of SNAP operations in “state-supervised, county-administered” states. This report also seeks to elevate techniques that have been successful in county-administered environments and recommend additional research and resource development to further support those seeking policy, process, and technology changes that increase access to SNAP.

WHAT IS A “STATE-SUPERVISED, COUNTY-ADMINISTERED” STATE?

FNS considers ten states to be unique because they administer SNAP at the county, rather than state, level. While the state agency still retains all policy authority and responsibility for faithful oversight and execution of SNAP in these states, implementation is largely the responsibility of local county governments. Approximately 30% of SNAP recipients nationwide (12.5 million individuals) live in one of ten “state-supervised, county-administered” states. Those states are:

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

These states also tend to utilize a county-administered structure for other federally-funded programs, such as Temporary Assistance for Needy Families (TANF).⁴



THE SINGLE UNIFYING CHARACTERISTIC OF COUNTY-ADMINISTERED STATES IS
THAT **SNAP** APPLICATION PROCESSING AND ELIGIBILITY DETERMINATIONS
ARE CONDUCTED BY COUNTY EMPLOYEES IN COUNTY-RUN LOCAL OFFICES.

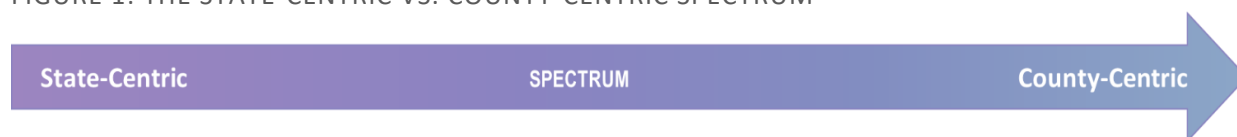
The single unifying characteristic of county-administered states is that SNAP application processing and eligibility determinations are conducted by county employees in county-run local offices. All county-administered states also provide some degree of flexibility to counties in how they organize their workflow and what technology they use, although the amount of operational flexibility varies widely across the ten states. Because of this operational flexibility and the likelihood that local county governments will have distinct hiring, training, and/or collective bargaining arrangements, SNAP business processes can look very different from one county to the next. Although some county-administered states share other commonalities, county-controlled hiring is the only characteristic that applies to all ten county-administered states. By comparison, the Urban Institute defines county-

⁴ Eight of the states listed above are also considered county-administered for TANF. Virginia and Wisconsin are excluded because the federal agency that administers TANF (the U.S. Department of Health and Human Services, Administration for Children and Families) considers these states to be regional, rather than county-based, operational models.

administered systems for TANF by two additional characteristics: (1) county governments contribute funding for TANF and (2) county elected officials have a role in reviewing the local TANF budget, policy or both.⁵ Neither of these factors applies to all ten county-administered SNAP states.

Despite the immense diversity of practices among county-administered states, states do appear to fall along a spectrum of “state-centric” to “county-centric” approaches to each operational area, based on where the main locus of control (state vs. county) appears to be, as depicted in Figure 1.

FIGURE 1: THE STATE-CENTRIC VS. COUNTY-CENTRIC SPECTRUM



For example, the two states where the state agency provides all administrative funding (Ohio and North Dakota) would be considered “state-centric” on this factor, while the three states where counties must raise all of their own administrative funds (Minnesota, North Carolina, and New Jersey) would be considered “county-centric.” The other five states where the administrative funding obligation is shared between states and counties fall somewhere in the middle of this spectrum.

In both SNAP and TANF, counties in Colorado and California have the “most extensive autonomy and responsibility” compared to the other county-administered states. On the other end of the spectrum, North Dakota “offers counties almost no direct authority” in either SNAP or TANF.⁶

WHY SHOULD SNAP STAKEHOLDERS CARE THAT THEIR STATE IS “COUNTY-ADMINISTERED”?

Experienced SNAP advocates in almost every county-administered state described difficulty achieving certain goals due, at least in part, to their state’s decentralized administrative structure. Specific challenges include:

- Policy victories at the state or federal level (e.g. new legislation) can be complicated by inconsistent implementation of policy changes at the county level. This can be the result of infrequent and/or inadequate training of eligibility workers at the local level, weak policy guidance and lack of resources for enforcement from the state, or both.
- It can be very difficult for SNAP stakeholders to identify and raise attention to misapplication of policy and/or poor customer service in as many as 100 different counties throughout the state. As one observer put it, “It feels like [we are] are always playing whack-a-mole.”

“It feels like we are always playing whack-a-mole.”

⁵ Hahn, Heather, et. al. *A Descriptive Study of County - Versus State - Administered Temporary Assistance for Needy Families Programs*. OPRE Report # 2015-42, Washington, DC: Office of Planning, Research and Evaluation, Administration for Children and Families, U.S. Department of Health and Human Services. 2015. Available at https://www.acf.hhs.gov/sites/default/files/opre/county_tanf_final_report_submitted_to_acf_b508.pdf.

⁶ Hahn, et al.

- Because customer service and case management practices can vary widely between counties in the same state, SNAP applicants can face more barriers to enrollment in some counties than others. Furthermore, SNAP recipients moving from one county to another may struggle to stay enrolled in SNAP.

Despite these clear challenges, some advocates did report positive aspects of operating in a county-administered state. For instance, because most state agencies allow counties significant operational flexibility, motivated county leaders can experiment with more client-friendly business processes, such as out-stationing eligibility workers at food banks or developing high-functioning call centers. Successful experiments often spread to peer counties around the state, leading to a virtuous cycle of competition that, under the best circumstances, can raise customer service standards in many counties. Some clear examples of recent county innovation come from Hennepin County in Minnesota (Minneapolis/St. Paul area) and New York City (See example box).

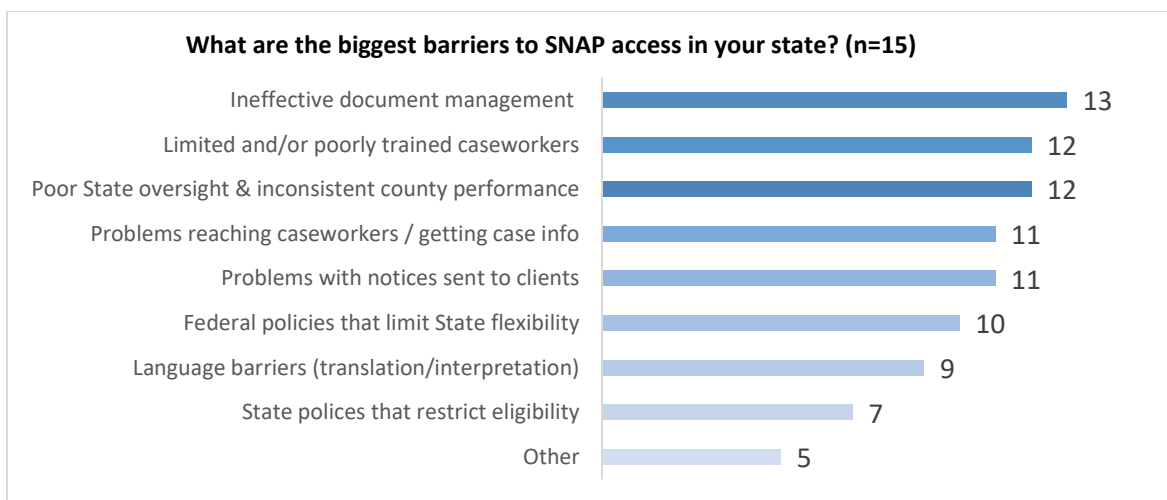
It is also important to note that many of the biggest barriers to SNAP access in county-administered states are *not* unique to these states. As depicted in Figure 2 below, many of the most common barriers reported by advocates in county-administered states – such as ineffective document management systems, poorly trained eligibility workers, difficulty reaching workers or receiving case information, and language barriers – are also reported frequently by SNAP stakeholders in state-administered states. The main difference between county-administered and state-administered systems is that the strategies to address these common barriers often must take a different form.

INNOVATIONS IN COUNTY-ADMINISTERED STATES

New York City received an FNS waiver to develop an IVR system for recertifications that allows certain populations to complete the recertification interview over the phone at their own convenience without speaking to a worker.

Hennepin County, MN has been able to decentralize their eligibility processes and integrate into the community. They are frequently co-locating at social service organizations, schools, etc. so clients feel more welcome and service is more comprehensive.

FIGURE 2: BARRIERS TO SNAP ACCESS IN COUNTY-ADMINISTERED STATES



METHODOLOGY

In October 2017, the authors sent a short survey to twenty-two experienced SNAP advocates in the ten county-administered states to get a general idea of the most important topics to explore. The survey received a 68% response rate with the majority of respondents (12 of 15) reporting that administrative advocacy related to SNAP is a significant focus for their organization.

The authors analyzed survey results and then developed a standard set of questions for 60-minute key informant interviews with SNAP advocates and administrators in each state. From November 2017 through February 2018, the authors conducted 23 interviews with 30 people in all ten states, including SNAP Directors from eight states.⁷ During the same period, the authors conducted extensive background research to explore relevant statutory and regulatory language, publicly available performance data, and the policy agendas of influential stakeholder groups (e.g. county directors' associations) in each state. In December 2017, the authors compiled and shared preliminary findings with a group of advocates that had participated in key informant interviews to solicit feedback. After their review, the authors made revisions and conducted additional research to strengthen understanding in certain areas before putting together this report.

A number of limitations should be considered when reading this report. First, due to the short timeframe for initial data collection and analysis, all findings should be considered preliminary. Further conversations with state administrators, as well as county directors (who were generally not included in key informant interviews) would be necessary to get a more complete picture of SNAP operations in all ten county-administered states. Additional data analysis with state-level performance data (e.g. county-level timeliness and error rates) would also add significant value to the comparative state analyses attempted in this report.

FINDINGS

This section lays out key findings from the preliminary research with a focus on comparing state operating models and how advocates can potentially influence state practices. Before diving into each focus area, this section reviews how county-administered states perform compared to each other and the national average on various performance metrics published by FNS.

HOW WELL DO COUNTY-ADMINISTERED STATES PERFORM COMPARED TO NATIONAL AVERAGES?

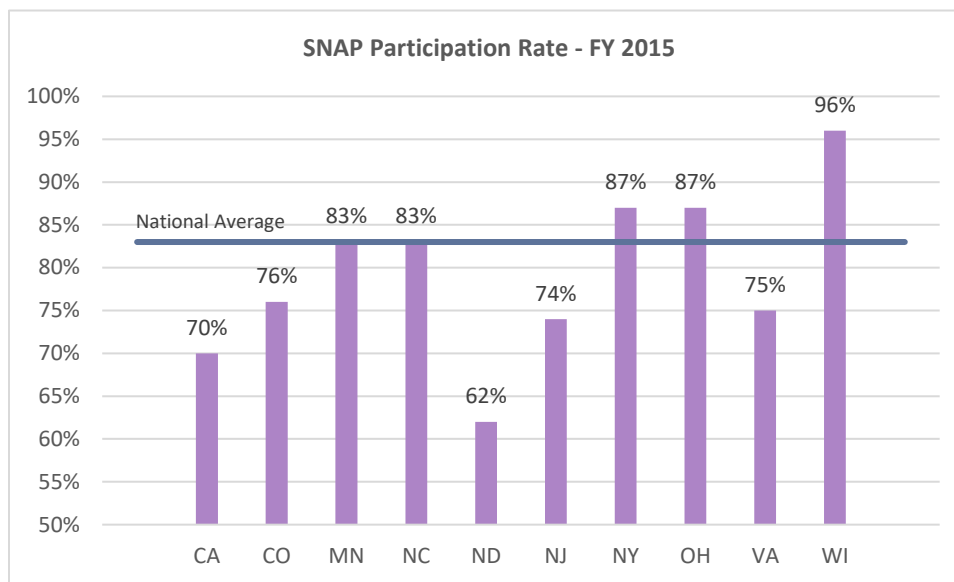
FNS publishes state rankings on various performance metrics each fiscal year. The performance metric tracked most closely by advocates is the SNAP participation rate, which measures the percentage of all eligible residents in each state that are actually receiving SNAP benefits. The SNAP participation rate is a critical measure of access because it serves as a proxy for how readily accessible SNAP is to low-income households based on a state's policy and procedural choices, as well as the strength of the state's education and outreach programs.

The national SNAP participation rate for FY 2015 was 83%.⁸ As depicted in Figure 3, half of all county-administered states fell below the national SNAP participation rate, while the other half were at or above the national average. Wisconsin had the highest participation rate among county-administered states at 96 percent, while North Dakota has the lowest rate at 62 percent – a difference of 34 percentage points.

⁷ SNAP Directors from Colorado, North Carolina, New Jersey, Minnesota, Ohio, and Virginia were interviewed in November 2017. North Dakota and Wisconsin's SNAP Directors were interviewed in January and February 2018, respectively.

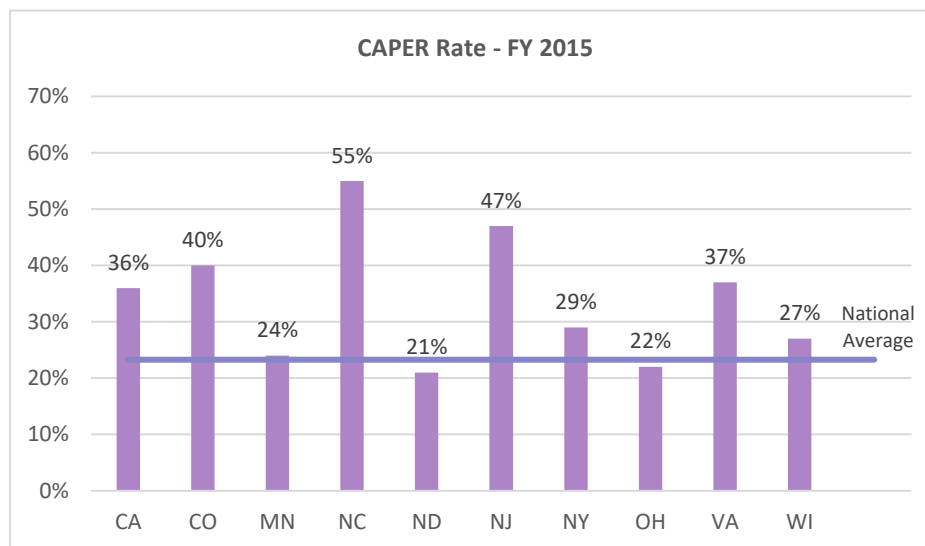
⁸ Cunyngnam, Karen. *Reaching Those in Need: Estimates of State Supplemental Nutrition Assistance Program Participation Rates in 2015*. Mathematica Policy Research for the Food and Nutrition Service, January 2018. Available at <https://www.fns.usda.gov/snap/reaching-those-need-estimates-state-supplemental-nutrition-assistance-program-participation-2>.

FIGURE 3: SNAP PARTICIPATION RATE, FISCAL YEAR 2015



The Case and Procedural Error Rate (CAPER) is a national performance metric that tends to be a high priority for state agencies and FNS. The CAPER measures whether the state properly denied, suspended, or terminated SNAP benefits to households and issued proper notices. Lower rates signify higher performance. Most county-administered states under-performed compared to the national average of 23% in FY 2015, as shown in Figure 4.

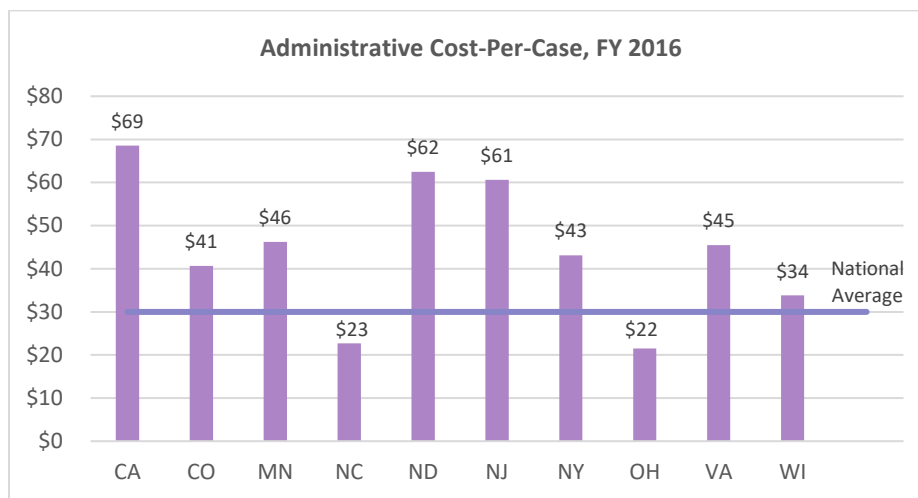
FIGURE 4: CASE AND PROCEDURAL ERROR RATE, FISCAL YEAR 2015



The third national metric of relevance for this study is the administrative cost-per-case, which indicates how much money states (and in turn, the federal government) spent on SNAP administration in Fiscal Year 2016. Although many factors contribute to cost per case – many of which are out of a state agency's control – states report continual pressure from FNS, as well as local policymakers, to lower these costs. As shown in Figure 5, all but two of the county-

administered states (Ohio and North Carolina) have an average cost-per-case above the national average. California has the highest cost-per-case, followed by North Dakota and New Jersey.

FIGURE 5: AVERAGE ADMINISTRATIVE COST-PER-CASE (STATE SHARE), FISCAL YEAR 2016⁹



Although most key informant interviews did not specifically explore administrative cost-per-case rankings, a few possible explanations for the highest-cost states emerged –

- In California, counties administer SNAP through three regional eligibility systems, each of which has ongoing programming and maintenance costs. FNS has asked California to begin working towards the development of a single, statewide eligibility system to replace these regional systems due, at least in part, to FNS concerns about the state’s high administrative costs. Other contributing factors in California may include the state’s generally high cost of living and strong union protections for eligibility workers.
- North Dakota, by contrast, is a rural state where many counties serve very small caseloads. According to North Dakota’s SNAP agency, 85% of the SNAP caseload resides in 14 large and medium sized counties while the other 37 counties share the remaining 15% of the caseload, made up of just 4,100 cases. Due to the high cost to counties to administer SNAP in these small communities, the state agency has a pilot underway to pay county administrative costs and centralize certain administrative processes. (*See “Regionalization” section for additional details.*)
- In New Jersey, the SNAP agency reported that counties are required to maintain certain staffing ratios to ensure that caseload sizes remain manageable, which may be an important customer protection. With this information, stakeholders may want to encourage maintaining such protections amidst pressure to reduce the state’s administrative cost-per-case.

Finally, the authors explored whether the sheer number of counties in a state impacted the administrative cost-per-case, which ranges from 21 counties in New Jersey to 100 in North Carolina, as shown in Figure 6 below. No clear correlations were apparent to the authors.

⁹ *Supplemental Nutrition Assistance Program State Activity Report, Fiscal Year 2016*, Food and Nutrition Service, Program Accountability and Administration Division, September 2017. Available at <https://fns-prod.azureedge.net/sites/default/files/snap/FY16-State-Activity-Report.pdf>.

FIGURE 6: SNAP ADMINISTRATIVE COSTS (STATE + FEDERAL), FISCAL YEAR 2016

State	# of Counties	SNAP Households	Total Administrative Costs (State Share)
CA	58	2.1 Million	\$1.7 Billion
CO	64	225,000	\$110 Million
MN	87	231,000	\$128 Million
NC	100	762,000	\$208 Million
ND	53	25,000	\$19 Million
NJ	21	440,000	\$320 Million
NY	62	1.6 Million	\$846 Million
OH	88	794,000	\$205 Million
VA	95	388,000	\$211 Million
WI	72	360,000	\$146 Million

The remainder of this report provides an overview of various aspects of SNAP administration in county-administered states that are relevant for state-based SNAP stakeholders. These findings only scratch the surface on each topic, so the authors hope the information will spark additional research and evaluation from other state and national groups, as detailed in the final section of the report.

POWER DYNAMICS

In order to understand the politics of how each county-administered system evolved over time, this research began with an exploration of the power dynamics between the Executive branch (e.g. Governor's Office, Cabinet Secretary), the State Legislature, and County leadership (e.g. County Commissioners, local agency directors). The research on power dynamics focused on the power to set *policy* - specifically the election of various federally-permitted policy options that directly result in more or less restricted access to SNAP at the local level. This report discusses power over *implementation* (e.g. business process decisions) separately.

During key informant interviews, virtually all stakeholders reported that the Executive and/or Legislative branches control policy decisions, rather than the counties. In eight of the ten states, SNAP advocates and administrators reported that policy is driven primarily by the Governor and his/her cabinet appointees. Clear examples of this include North Carolina, where a former Governor expanded categorical eligibility for SNAP over the objection of some counties, and Wisconsin, where the current Governor has pushed the boundaries of federal approval to impose strict work requirements on SNAP-eligible adults with and without children.

By contrast, California reported the most legislative involvement in policymaking, where lawmakers have required state and county agencies to elect federal options that promote SNAP access. New Jersey's legislature has attempted similar measures to increase SNAP access, but were unable to overcome the former Governor's vetoes. In a few states, the legislature has only recently gotten involved in SNAP policymaking through bills promoted by outside

groups like the Foundation for Government Accountability that attempt to restrict SNAP access, such as banning the use of ABAWD waivers or requiring photo EBT cards and/or drug testing of SNAP recipients.¹⁰ See Figure 7.

FIGURE 7: POLICY POWER DYNAMICS

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

In all ten county-administered states, counties only have autonomy over business process decisions that effectively operationalize state and federal policies in local offices. The few exceptions come from states where counties are allowed to opt in or out of certain policy options, such as whether SNAP Employment and Training will be voluntary or mandatory, or whether to operate a Disaster SNAP Program.¹¹

Four states reported that counties do leverage significant political power, even if they do not have the authority to make policy directly. Colorado, where County Commissioners hold independent political power and control sizeable county budgets, is the clearest example. Also included in this group are California, Ohio, and New York where counties enjoy some degree of political influence (e.g. through a County Directors Association) and therefore enjoy meaningful inclusion in policy decisions under consideration in the Executive or Legislative branches. It is also common for large metro counties to wield more influence over policy decisions than smaller counties in the same state, with New York City being the most dramatic example. These power dynamics appear to stem primarily from historical precedence and/or individual leadership personalities.

Another major factor influencing the power dynamics between the Executive, the Legislature, and Counties is the administrative cost-sharing arrangement. The federal government requires states to contribute 50% of the administration costs in order to draw down federal matching funds. Most county-administered states opt to further split the funding responsibility with counties, for example, 25% county, 25% state, 50% federal. As shown in Figure 8 below, half of the states share costs with counties although these percentages differ by state, and sometimes by county.¹² In two states, the state provides all administrative funds and passes operating dollars through to counties.¹³ In the remaining three states, counties are required to provide all administrative funds, with the state agency simply facilitating the 50% reimbursement from FNS.

¹⁰ Examples come from North Carolina (ban on ABAWD waivers), Ohio (photo EBT), and Wisconsin (drug testing, mandatory E&T for parents).

¹¹ Examples come from Colorado (SNAP E&T, Pre-Release Waiver); Virginia (SNAP E&T); New York (SNAP E&T, Disaster SNAP).

¹² For example, New York splits administrative costs (25% county, 25% state, 50% federal), except in New York City where the county covers all matching costs (50% county, 0% state, 50% federal). California's funding distribution is also unique with a cost allocation formula of 35% county, 15% state, 50% federal).

¹³ North Dakota just began a two-year pilot to test this state funding model, which was the result of a funding crisis at the county level. Previously, counties were required to raise their all of their own funding to draw down the 50% federal match.

FIGURE 8: 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		✓	

It is important to note that, although counties many not technically have power to set policy in their states, several stakeholders noted that counties often interpret and subsequently implement state policies in ways that either restrict or expand SNAP access, based on local values. For example, some counties appear to have much stricter “policies” prioritizing paper documentation only, while others are more willing to utilize collateral contacts. So even though counties typically cannot make policy decisions in county-administered states, it can often appear that way to advocates.

WHAT CAN STAKEHOLDERS DO?

- ✓ Create a power map to clarify which policymakers have the most influence over SNAP policy decisions.
- ✓ Build relationships (and where possible, alliances) with county influencers, including your state’s association of county administrators.
- ✓ 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 AND OVERSIGHT

FNS requires all state agencies to conduct two core monitoring activities on an ongoing basis: Quality Control Reviews and Management Evaluations. This section briefly describes how each process is designed to work, as well as how stakeholders, including advocates, can learn more about the oversight activities happening in their state.

WHAT ARE QUALITY CONTROL REVIEWS?

Quality Control (QC) reviews are the primary mechanism for state agencies (and in turn, FNS) to determine the accuracy of a county’s eligibility determinations and benefits issuances. To complete a QC review, the state agency selects a small statistical sample of cases for a given month to determine whether approved households received the correct SNAP allotment (known as “active cases”) and whether denied applications and closed cases were done so properly (“negative cases.”) The state agency submits the results of their QC reviews to FNS on an ongoing basis, and FNS then selects a sub-set of cases for federal re-review to ensure accuracy. The final result of the federal QC review process on “active cases” determines the state’s “payment error rate” for each fiscal year, which includes

both overpayments and underpayments. Due to data integrity issues in some states, FNS has not reported a national payment error rate since FY 2014.¹⁴

Technically, the QC review process also includes Application Processing Timeliness (which measures the percentage of applications processed in the required 30-day or 7-day timeframe), but states often talk about this metric separately from the “payment error rate.” (See “Data Transparency” section for more details.)

In county-administered states, both payment error rates and case and procedural error rates (CAPER) are typically tracked at the county level. However, due to the random nature of the case selection process, it is common for QC reviews to be more frequent in larger counties with bigger caseloads, resulting in smaller counties being left out of the QC review process. For this reason, it is imperative that state agencies have additional oversight measures in place.

WHAT ARE MANAGEMENT EVALUATIONS?

In addition to QC reviews, states are required to perform Management Evaluations (MEs), which review county operations throughout the year on a rotating basis, based on caseload size. Counties defined as “large” project areas must be reviewed every year, while “medium” areas are reviewed every two years, and “small” areas are reviewed every three years. State agencies are required to submit their ME review schedules to FNS before the beginning of each fiscal year.¹⁵

During the ME, state agency staff evaluates local agency operations, reviews financial and participation reports, and conduct on-site visits.¹⁶ Each fiscal year, FNS announces “target areas” for Management Evaluations based on national trends and at-risk program areas. For FY 2018, target areas include Able-Bodied Adults Without Dependents (ABAWD) tracking and policy compliance, SNAP Employment and Training programs, and EBT terminal system security, among others.¹⁷ When MEs identify deficiencies in a county’s SNAP operational or reporting processes, the state must work with the county to develop a “corrective action plan” and monitor its implementation. Examples of deficiencies requiring corrective action include high payment error rates, improper denials, or poor timeliness rates.

Federal regulations say that corrective action plans should be “open-ended” and “remain in effective until all deficiencies in program operations have been reduced substantially or eliminated.”¹⁸ Corrective action plans should include all information needed to monitor and evaluate the plan, including specific descriptions of the deficiencies and their magnitude, geographic extent of the problem (e.g. throughout the county or in a specific office), causal factors contributing to the problem, and detailed outlines of improvement actions to be taken and target dates for each deficiency to be eliminated.¹⁹

The authors did not explore state staffing practices for Quality Control and Management Evaluation units in most states, but a few examples do provide a window into how states fulfill these monitoring requirements. For QC reviews, the only clear requirement from FNS is that states must employ “sufficient QC staff to perform all aspects of the performance system” to ensure “quality of the reviews.”²⁰ Both QC and ME units are often separated from

¹⁴ See *Quality Control Policy Memo: 16-02, Food and Nutrition Service*, January 20, 2016. Available at <https://fns-prod.azureedge.net/sites/default/files/snap/QCPolicyMemo16-02.pdf>. FNS is expected to release a national payment error rate for FY 2017.

¹⁵ 7 CFR 275.5(b)(2) and 7 CFR 275.2

¹⁶ 7 CFR 246.19(b)(1)

¹⁷ See *Supplemental Nutrition Assistance Program – Fiscal Year 2018 State Target Areas for Management Evaluations, June 30, 2017*. Available at https://fns-prod.azureedge.net/sites/default/files/snap/FY2018_SNAP_State_Target_Areas_Memo.pdf.

¹⁸ § 275.18(a)

¹⁹ § 275.18(b). An example of a county’s corrective action plan (from Denver, Colorado in FY 2012) can be found here: https://www.denvergov.org/content/dam/denvergov/Portals/344/documents/Single_Audit/CorrectiveActionPlan.pdf.

²⁰ FNS QC Handbook 310, October 2016. Available at https://fns-prod.azureedge.net/sites/default/files/snap/FNS_310_Handbook.pdf.

the SNAP policy chain of command to ensure independent reviews, and are relatively small. For example, Ohio has 15 quality control staff, as well as 7 staff performing Management Evaluations across 88 counties. By comparison, North Carolina has just 4 ME staff serving 100 counties, with an additional 9 staff dedicated to a team that provides hands-on technical assistance to counties under corrective action plans.

WHAT ENFORCEMENT TACTICS CAN STATES EMPLOY WHEN COUNTIES DO NOT IMPROVE?

When corrective action plans and successive attempts to provide technical assistance fail to sufficiently improve county performance, most states have additional authority to impose penalties or, in the most extreme cases, take over county operations. The authors researched state-level statutory and regulatory language to understand the legal authority state agencies have over counties in each of the ten county-administered states. As summarized in Figure 9, most states have specific statutory language detailing the state’s powers when counties fail to meet performance expectations, even though SNAP advocates and administrators report that these powers are rarely, if ever, invoked. In one state, the authors were unable to find any statutory language defining how the state could compel counties to comply with federal and state rules, but it may exist.

FIGURE 9: STATUTORY AUTHORITY OF STATES OVER COUNTIES²¹

State authority to take over county operations, at county’s expense	Counties liable for federal sanctions	Unknown
<ul style="list-style-type: none"> •New Jersey •Wisconsin 	<ul style="list-style-type: none"> •Ohio •Colorado •Minnesota •New York •North Carolina •California •North Dakota 	<ul style="list-style-type: none"> •Virginia

WHAT CAN STAKEHOLDERS DO?

- ✓ Review your state’s quality control rates 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) or Public Records Act (PRA) request, if necessary.
- ✓ Review any open corrective action plans for struggling counties. Consider meeting with county leadership to discuss target areas for improvement and offer suggestions to resolve client access issues.
- ✓ Review your state’s legal authority to impose sanctions and/or take over local operations when counties consistently underperform. 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.

²¹ For a full list of links to state language used for this analysis, see *Appendix A*. Note that although New York has fairly strong statutory language about state oversight of county operations, advocates reported that a court ruling in 1999 weakened legal aid’s ability to hold the state accountable for poor performance by counties.

DATA TRANSPARENCY

How county-administered states share county-level performance data is almost as important as the data itself. This research explored what data states routinely collect at the county level, if and how that data is published, and how advocates can encourage more data transparency in their states.



HOW COUNTY-ADMINISTERED STATES SHARE COUNTY-LEVEL PERFORMANCE DATA IS ALMOST AS IMPORTANT AS THE DATA ITSELF.

States typically track county-level performance data on at least a quarterly basis, even if that data is not readily available to the public. The most common performance metrics include:

- **PARTICIPATION AND BENEFIT AMOUNTS:** These figures represent the number of individuals and households enrolled in SNAP each month, along with the value of SNAP benefits distributed to these households. Most states publish statewide enrollment figures on their agency website, and some states also display this data at the county level.²² While participation data is important to track over time, it does not speak directly to county-level performance, since enrollment figures can fluctuate based on a range of factors, such as the local unemployment rate.
- **APPLICATION TIMELINESS RATES:** This figure represents the number of applications processed within federal standards (i.e. approvals within 30 calendar days for regular SNAP applications and 7 calendar days for expedited SNAP applications).²³ The federal timeliness standard is 95%, meaning at least 95% of all SNAP applications each month must be processed on time. States that fall below 90% are subject to corrective action plans by FNS and, in some cases, have received advanced warning letters which threaten the loss of federal funding. At least five county-administered states have been under advanced warning (NC, OH, NJ) or federal corrective action plans for poor application timeliness in recent years (CO, VA).

Most, if not all, county-administered states track application timeliness at the county level. Several states circulate this data to all counties to encourage a sense of “healthy competition” to improve overall performance, including New Jersey, Minnesota, and Ohio. At least two states (North Carolina and California) make this information available through a public website and update it regularly.²⁴

- **PAYMENT ERROR RATES** – This figure represents the percentage of approved households receiving the correct SNAP allotment (“active error rate”) as discussed in the previous section. FNS publishes state-level payment error rates each fiscal year.²⁵ States are less likely to track payment error rates at the

²² FNS publishes the most recent state-level data here: <https://www.fns.usda.gov/pd/supplemental-nutrition-assistance-program-snap>.

²³ Details on the timeliness rate calculations can be found here: <https://fns-prod.azureedge.net/sites/default/files/snap/Triples%20Timeliness%20Memo%202023May2017.pdf>. Note that some states have adopted shorter processing standards (e.g. 3 or 5 calendar days) for Expedited SNAP.

²⁴ North Carolina’s Application Processing Timeliness Rates by County (by Week) and Recertification Processing Timeliness (by Month) are available at <https://www2.ncdhhs.gov/dss/stats/fsp.htm#Timeliness>. California’s Application Timeliness Rates by County (by Month) are available at <http://www.cdss.ca.gov/inforesources/Data-Portal/Research-and-Data/CalFresh-Data-Dashboard>.

²⁵ Although not on FNS’ website for recent fiscal years, North Carolina publishes unofficial rates for each state here: <https://www2.ncdhhs.gov/dss/stats/fsp.htm#QC>.

county level due to small sample sizes. As with application timeliness, North Carolina and California publish active error rates at the county-level for public review.²⁶

- **CASE AND PROCEDURAL ERROR RATES (CAPER)** – This figure represents the percentage of denied applications and closed cases that were done so properly, including use of proper notices, as discussed earlier in this report. FNS publishes state-level CAPER rates each fiscal year. Like the payment error rate, states are less likely to publish CAPER rates at the county-level, though some – including North Carolina and California – choose to do so in order to encourage counties to compare their ongoing performance against their peers.
- **CUSTOMER SERVICE METRICS** – States and counties track a range of other metrics, including call center wait times and percentage of dropped calls, days to application resolutions, percentage of submitted applications that are approved, denied, or withdrawn, and top reasons for application denial. Although FNS does not specifically require states or counties to track these metrics, most do in some capacity as workflow management tools. This data should be available to advocates upon request.

Nearly half of stakeholders reported that their states publish some county-level performance data, or make it available upon request. The remainder of survey respondents said their state does not publish the data or make it easily available, as shown in Figure 10.

FIGURE 10: COUNTY-LEVEL PERFORMANCE METRICS

Published	Available upon request	Not easily available
<ul style="list-style-type: none">•California•New Jersey•North Carolina	<ul style="list-style-type: none">•Colorado•Minnesota•North Dakota•Virginia•Wisconsin	<ul style="list-style-type: none">•New York•Ohio

In addition to ongoing performance tracking, some states develop specific goals or targets for counties. Some states are required to do this as part of a federal corrective action plan (typically for poor application timeliness rates), but a few states, like Colorado, have voluntarily created goals for counties to set clear expectations and incentivize high performance.

WHAT CAN STAKEHOLDERS DO?

- ✓ Share county-level performance data, at least internally, to promote healthy competition between counties.
- ✓ Advocates, build relationships with state agency leaders and put data requests near the top of your agenda.
- ✓ Share examples of successful public “data dashboards” from peer states with state agency leaders to encourage more data transparency.

²⁶ North Carolina’s Active Case Error Rates, October 2016-June 2017 are available at <https://www2.ncdhhs.gov/dss/stats/docs/quality%20control%20docs/06-17%20Actives.pdf>.

- ✓ Consider partnering with a local university or other entity to support a more detailed analysis of any data provided by state or county agencies.

ELIGIBILITY AND DATA SYSTEMS

The ability to access timely and reliable performance data at the state or county level is largely dependent on the state having a well-functioning eligibility system and associated data warehouse. Unfortunately, many states (including state-administered ones) still use decades-old legacy computer systems that are difficult to maintain and often limited in what kind of data can be extracted. Since a state's information technology systems play such a major role in administrative effectiveness and oversight, this research sought to learn more about the status of each state's eligibility and data systems and any new technology investments underway.

Because all states were required to update their Medicaid eligibility systems in 2013 and 2014 to accommodate implementation of the Affordable Care Act, new federal funding became available to modernize state eligibility systems, including those that facilitate SNAP enrollment. States have until the end of 2018 to bypass standard "cost-allocation" rules, giving states an incentive to modernize their eligibility systems before the deadline.²⁷

As depicted in Figure 11 below, three states (North Carolina, Virginia, and most recently, Ohio) developed new, web-based eligibility systems that fully integrate SNAP, Medicaid, and TANF. Four states (California, Minnesota, New York, and North Dakota) developed new systems for Medicaid, but did not include SNAP in the process. The majority of county-administered states have continued to modify existing legacy systems to accommodate changes in SNAP policy over time. Advocates in these states report that requests for reprogramming of or new data reports from these aging systems are met with significant resistance from state leaders due to associated costs.

FIGURE 11: RECENT IT ELIGIBILITY SYSTEM MODERNIZATION

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

All but two states have a single SNAP eligibility system and data warehouse that state agencies control and can directly access. California and New York have multiple eligibility systems and data warehouses controlled by counties that state agencies cannot directly access.²⁸ This means that in order to access any data beyond what is available in

²⁷ For more on this topic, see Shaw, Terri, et al. *State Innovations in Horizontal Integration: Leveraging Technology for Health and Human Services*, Social Interest Solutions and Center on Budget and Policy Priorities. March 2015. Available at <https://www.cbpp.org/sites/default/files/atoms/files/3-23-15fa.pdf>

²⁸ In New York, only New York City has an independent eligibility and data management system. All other counties use a single "upstate" eligibility system that is controlled by the state's SNAP agency.

standardized reports, these states (and advocates) must request information from counties individually. According to advocates, this process has the effect of reducing the state’s ability to oversee county performance and leaves the state out of many IT governance decisions. As mentioned previously, California was recently tasked by FNS to migrate their systems into a single platform over the next 3 to 5 years and planning is underway.

WHAT CAN STAKEHOLDERS DO?

- ✓ Learn the names of your state’s eligibility system(s), the vendor(s) responsible for maintaining them, where application and case data are stored, and, and the process/timeline by which data requests are fulfilled.
- ✓ Build your IT “vocabulary” to improve the likelihood that state agency staff (especially system programmers, who may be contracted vendors) understand and are responsive to your requests.
- ✓ If your state is considering the development of a new eligibility system for SNAP, request a seat at the governance table, or a process for stakeholders to get updates and provide input – the earlier, the better.
- ✓ If an upcoming change in your state is subject to FNS’ Major Changes Rule, request a copy of the project description, vendor information, impact analysis, and quarterly reports that your state must send to FNS.
- ✓ During the implementation of a new system (including pilot phases), leverage your community networks to closely monitor the impact of the changes on customer service levels and client outcomes. Consider requesting to be part of the “user acceptance testing” process.

BUSINESS PROCESS MODERNIZATION

In addition to major eligibility system overhauls, states and counties are constantly exploring other modernization opportunities to achieve efficiencies and reduce costs. SNAP advocates and administrators reported a range of business process modernization efforts underway in county-administered states, which are summarized below.²⁹ Note that research on this topic was far from comprehensive, so these results should only be considered a jumping off point for further exploration.

Although states across the country are increasingly relying on high volume call centers to facilitate SNAP enrollment and renewals, full-service statewide call centers are uncommon in county-administered states, since caseloads are not typically shared across county lines. Instead, county-administered states reported that their largest counties frequently develop their own call centers – often on custom-built platforms – while smaller counties continue to rely on traditional in-person enrollment processes. See Figure 12 for details.

²⁹ As referenced above, a detailed description of business process modernization efforts affecting both Medicaid and SNAP in California and Colorado can be found in Shaw, Terri, et al. *State Innovations in Horizontal Integration: Leveraging Technology for Health and Human Services*, Social Interest Solutions and Center on Budget and Policy Priorities. March 2015. Available at <https://www.cbpp.org/sites/default/files/atoms/files/3-23-15fa.pdf>

FIGURE 12: CALL CENTER USAGE³⁰

State Only	State and County	Counties Only
<ul style="list-style-type: none"> • Virginia 	<ul style="list-style-type: none"> • Minnesota • New York • Wisconsin 	<ul style="list-style-type: none"> • California • Colorado • New Jersey • North Dakota • North Carolina • Ohio

Two states with unique call center designs are Wisconsin and Ohio. In Wisconsin, the state agency began operating a full-service call center that services Milwaukee after the state’s takeover of the county’s SNAP program due to chronically poor performance. In the remainder of the state, ten county consortia operate their own call centers which share workers and caseloads across county lines. In Ohio, more than half of the state’s 88 counties now participate in the state’s voluntary “Shared Services” initiative, which allows counties to utilize a centralized call center platform to manage their own caseloads, and in some instances, share phone calls and caseloads across counties. *(More details on Wisconsin and Ohio’s efforts are included in the section on “Regionalization.”)*

Other popular modernizations underway in states, as depicted in Figure 13, include:

- **CASE BANKING** – A workforce management strategy that assigns eligibility workers to a “bank” of shared cases, instead of each worker being responsible for a defined caseload. This strategy is common in counties that utilize call centers, and helps to avoid timeliness issues or application backlogs that can result from caseworker turnover and extended caseworker absences.
- **ONLINE CASE INFORMATION** – Some states with online applications have developed web and/or mobile portals for applicants to directly view their case status information, read notices, and in some cases, report changes (e.g. new addresses). These platforms work best for the segment of the SNAP population that is comfortable with technology, has reliable internet access, and checks email frequently.
- **IVR CALL CENTER** – Interactive Voice Response (IVR) is a type of call center technology that allows callers to provide and/or access information without talking to a live worker. In New York City, for example, a waiver from FNS allows certain households to complete the recertification process through an IVR process, saving time for recipients and caseworkers alike.
- **TEXTING** – Some California counties, along with New York City, have begun experimenting with text messaging as a way to remind households about upcoming recertification deadlines and/or outstanding verification documents. These text messaging programs may be run by the county directly, or through a third-party vendor.

³⁰ This chart does not include state hotline numbers that simply refer callers to their local county or third-party call centers that are not run by the state or county (e.g. non-profit application assistance hotlines).

FIGURE 13: SELECT PROCESS MODERNIZATION TECHNIQUES³¹

Case Banking	Online Case Information	IVR Call Center	Texting
<ul style="list-style-type: none"> •At least one county all 10 states •Least common in North Dakota and New Jersey 	<ul style="list-style-type: none"> •California •Colorado •New York •North Dakota •Ohio •Virginia •Wisconsin 	<ul style="list-style-type: none"> •California •New York 	<ul style="list-style-type: none"> •California •Colorado •New York •North Dakota

WORKER TRAINING

Stakeholders frustrated with inconsistent policy compliance at the county level often point to infrequent and/or insufficient training for eligibility workers as a persistent problem. In a few states, SNAP policy training is provided primarily by the state agency through standing new worker trainings and web-based refresher trainings. The main advantage of state-led trainings is the uniformity, which reduces the likelihood that incorrect information will spread through local trainers. The downside of state-led trainings is they typically occur less frequently than local trainings, which can be especially problematic when caseworker turnover rates are high.

On the opposite end of the spectrum, three states said they rely exclusively on counties to train their own eligibility workers. County-based trainings have the advantage of being more tailored to the local context and can more easily integrate policy and operational information into a unified training curriculum. Still, county-based trainings may lead to more policy divergence at the local level based on how local trainers interpret state and federal requirements.

In the other half of county-administered states, eligibility worker training is a shared responsibility between the state agency and local counties, as shown in Figure 14. In these states, the state agency will typically provide “train the trainer” style trainings and webinars on new federal policies and other “hot topics” (e.g. new ABAWD rules), but will leave standard policy trainings, including refresher trainings, to the counties.

FIGURE 14: ELIGIBILITY WORKER TRAINING MODELS

State-led Trainings	State and County-led Trainings	County-led Trainings
<ul style="list-style-type: none"> •Wisconsin 	<ul style="list-style-type: none"> •Colorado •Minnesota •North Carolina •North Dakota •New York •Virginia 	<ul style="list-style-type: none"> •California •New Jersey •Ohio

³¹ As of February 2018, Ohio was still in the midst of a pilot phase integrating SNAP into the state’s new online portal (benefits.ohio.gov), which currently only serves Medicaid. SNAP is expected to be fully incorporated in the summer of 2018.

WHAT IS THE FNS MAJOR CHANGES RULE?

In January 2016, FNS published the “Review of Major Changes in Program Design and Management Evaluations Systems Final Rule” which, among other things, required state agencies to:

- Notify FNS if they plan to implement a “major change in operations,” and
- “Collect and report data that can be used to identify and correct problems relating to integrity and access, particularly for certain vulnerable households.”³²

Examples of major changes that would be subject to the FNS rule include:

- Certain office closures,
- “Changes in operations” ... “[including] implementation of a call center or internet web portal for change reporting, a major modification to forms that households use to report changes,
- “The replacement of the State’s automated systems used in the certification process,
- “Adding functionality to the existing automated system used in the certification process, or
- “Changes in the way applicants and participants interact with SNAP.”³³

States subject to the Major Changes Rule must provide FNS with a “description of the change and an analysis of its anticipated impacts on program performance” which includes “an evaluation of the impact of the change [on] key performance metrics such as payment error, negative error, timeliness and program access/customer service.”³⁴

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, as well as technology limitations, in mind as the state designs technology-based solutions to long-standing access problems (E.g. Push back against a new online application that requires users to have a valid email address).
- ✓ 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 (e.g. for required interviews) which are particularly important for certain vulnerable populations. Review the State’s Advanced Planning Document (APD) and Major Changes Rule analysis related to any modernization efforts or other changes.
- ✓ Consider expanding an existing statewide Medicaid contact center to include SNAP.
- ✓ Ask your state or counties how they incorporate effective teaching techniques for adult learners and what standards they have in place to ensure trainings are effective.
- ✓ Advocates, ask your state or counties if you can sit in on a worker training to better understand the new worker experience, offer feedback on strengths and opportunities to enhance trainings, and even

³² Final Rule language and associated guidance from FNS is available at <https://www.fns.usda.gov/snap/fr-011916>.

³³ *Supplemental Nutrition Assistance Program (SNAP) – Review of Major Changes in Program Design and Management Evaluation Systems Final Rule*, January 19, 2016. Available at <https://fns-prod.azureedge.net/sites/default/files/Major-Change-Rule-Implementation-Memo-1-19-2016.pdf>.

³⁴ Ibid.

to share about your organization's work with SNAP (particularly if your staff may be interacting with workers). Also ask if you can review the training materials to identify variations.

REGIONALIZATION

Some of the administrative challenges in county-administered states, such as inconsistent policy implementation, may simply be more difficult to overcome in a county-run environment. This conclusion has led several states to begin experimenting with regional collaboration or consolidation as a means to achieve administrative efficiencies and develop a more standard client experience, without going all the way to full centralization of SNAP administration.³⁵ The four county-administered states that are somewhere along the regionalization path are described below.

WISCONSIN: In 2011, the Wisconsin legislature passed a law consolidating 72 county operations into 10 multi-county consortia and one state-operated metro area (Milwaukee).³⁶ The legislation required each consortium to maintain local offices and operate regional call centers to process applications and make eligibility determinations. The state agency assumed responsibility for centralized document processing, eligibility worker training, and all information technology related to the regional call centers. Though not perfect, Wisconsin advocates report several positive outcomes from the regional consolidation, including the introduction of on-demand interviews with electronic signature capacity through the new regional call centers, improved worker training, and greater policy consistency within each consortium.

OHIO: Rather than mandating regional consolidation, in 2011 Ohio's legislature changed an obscure law to allow three rural county offices to consolidate operations in order to achieve administrative efficiencies.³⁷ The following year, Hocking, Ross, and Vinton counties merged to form the South-Central Department of Job and Family Services.³⁸ In another part of the state, eight counties created a regional collaboration (called "Collabor8") which uses call center and document imaging technology to share caseloads across county lines without fully merging operations. This voluntary model of collaboration has continued to expand through the state's "Shared Services" call center platform that 73 out of 88 counties in Ohio have committed to utilize at some level.³⁹

NORTH CAROLINA: North Carolina's legislature passed a law in 2017 requiring "regional supervision" of 100 county offices by ten regional social services departments.⁴⁰ The bill language justified the move stating, "It has been challenging for the State to effectively supervise administration of complex social services programs in 100 counties and it would be more efficient and effective for the State to supervise fewer local agencies." The law established a "Social Services Regional Supervision and Collaboration Working Group" which must produce a plan for the transition by November 15, 2018, and the new regional entities must be fully operational by March 1, 2020. According to state advocates, concern over child welfare administration, not SNAP, was the driving force behind the legislation.

³⁵ Many federal-state programs, like SNAP, allow states to choose between a state-administered system and a state-supervised, county-administered one. In the 1940s, 32 of 50 states were "county-administered" but by 1990, only 15 states continued to operate this way. In the past 25 years, an additional 5 states (including Utah) moved from a county-administered to state-administered system, leaving just 10 states who still consider themselves "county-administered."

³⁶ See 49.78 of Wisconsin Code, available at <http://docs.legis.wisconsin.gov/statutes/statutes/49/V/78/1/br>.

³⁷ See House Bill 225 of the 129th Ohio General Assembly, available at http://archives.legislature.state.oh.us/bills.cfm?ID=129_HB_225.

³⁸ Details of the Hocking-Ross-Vinton Pilot Merger Project are available at [http://www.ccao.org/wp-content/uploads/12%20June%202nd%20Weds%20IFS%20HRV%20Merger\(1\).pdf](http://www.ccao.org/wp-content/uploads/12%20June%202nd%20Weds%20IFS%20HRV%20Merger(1).pdf)

³⁹ See Ohio's County Shared Services Map, last updated on February 28, 2018 at http://ohiobenefitsproject.ohio.gov/Portals/0/PDFs/CSS_Map.PDF.pdf

⁴⁰ Final language of House Bill 630 is available at <https://www.ncleg.net/Sessions/2017/Bills/House/PDF/H630v5.pdf>.

NORTH DAKOTA: In addition to pursuing regional consolidation, North Dakota appears to be exploring full centralization of certain features of SNAP administration. In 2017, the state legislature passed a law establishing a two-year pilot for the state agency to cover all administrative costs for counties, instead of requiring counties to raise their own funds to match federal dollars. Under this pilot, counties continue to employ eligibility workers in local offices who are responsible for processing applications and making eligibility determinations. The legislation requires the state agency to submit a report to the legislature before November 1, 2018 on the status of the pilot and the development of a permanent plan for the future. The legislation contemplates significant consolidation of county operations, including the possibility of staff reductions and office closures. An important excerpt from the legislation reads:

“The implementation plan must include recommendations for caseloads and outcomes for social services, designated child welfare services, and economic assistance [which includes SNAP]; considerations regarding the delivery of county social services to ensure appropriate and adequate levels of service continue; options for efficiencies and aggregation; analysis of the potential reduction in social service offices, organizations, and staff due to consolidations; the feasibility and desirability of, and potential timeline for, transitioning county social service staff to the department of human services; and considerations for oversight and chain of command within social services and human services.”⁴¹

WHAT CAN STAKEHOLDERS DO?

The trend towards regionalization is an area for stakeholders in county-administered states to watch closely. In some ways, regionalization presents an interesting opportunity to overcome certain challenges – particularly related to customer service standards or expanding access to technology improvements like document imaging. On the other hand, regional consolidation could introduce new transparency problems and potentially obscure local access issues. In North Carolina, SNAP stakeholders, including advocates, are actively engaged in the conversation about how to design the new regional framework and what consumer protections must be in place.



SOME OF THE ADMINISTRATIVE CHALLENGES IN COUNTY-ADMINISTERED STATES MAY SIMPLY BE MORE DIFFICULT TO OVERCOME IN A COUNTY-RUN ENVIRONMENT.

Some questions for stakeholders to raise as their states consider regionalization include:

- ✓ What are the core goal(s) of regional consolidation or collaboration in our state?
- ✓ What are the risks of consolidation for 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 early adopters, like Wisconsin?

⁴¹ Excerpt from Section 50-34-01 of Senate Bill 2206. Available at https://legiscan.com/ND/text/2206/id/1599931/North_Dakota-2017-2206-Enrolled.pdf.

RECOMMENDATIONS FOR FUTURE RESEARCH

As discussed above, this research only scratches the surface of important administrative issues in county-administered states and is intended to be a starting point for stakeholders to build their understanding of these models. Also encouraging is the ongoing interest and investment from FNS to better understand and support county-administered states.⁴² Ultimately, the authors hope experienced and novice SNAP stakeholders alike can use this information to be more effective within county-administered environments.

For advocates and organizations interested in building on this research, the authors compiled below the list of priority topics and interest areas, based on feedback received from experienced advocates at a presentation of preliminary findings in December 2017.

MONITORING AND OVERSIGHT:

Few advocates in county-administered states are familiar with the details of their state's processes for monitoring county compliance through Management Evaluations and Quality Control Reviews. Future research could include:

- Case studies on different state oversight models, including staffing designs (e.g. number of staff dedicated to Quality Control vs. Technical Assistance to counties).
- Review of corrective action plans from around the country that have come from Management Evaluations, and examples of how advocates helped develop and enforce those plans.
- Best practices in developing state-county memorandums of understanding (MOUs) that clearly define performance standards, penalties for poor performance, and states' ability to take-over functions that are consistently mismanaged by counties.

DATA TRANSPARENCY:

Because performance levels (e.g. timeliness, accuracy, customer service standards) can vary widely across counties, stakeholders should encourage their state leaders to share robust, *county-specific* performance data. Future research could answer the following questions:

- What analysis should stakeholders request or develop from their state and county data?
- What are promising practices, as well as pitfalls, of publishing county performance data?
- What models of county performance *incentives* exist (not necessarily from county-administered states) that stakeholders could recommend to their state agency partners?

REGIONALIZATION:

As discussed earlier in this report, regionalization is a relatively new trend that may be picking up momentum in county-administered states. Future research could address the following questions:

- What are the upsides of county consolidation or collaboration?
- What motivates state takeover and/or legislature-initiated regionalization? What are the intended goals and who is asking for it?
- What functions of SNAP administration are best suited for centralization (either at the state or regional level)?
- What are the risks or pitfalls to avoid?

⁴² FNS awarded Insight Policy Research with a 5-year contract to provide technical assistance on process improvement to select state and county agencies, which recently focused on three county-administered states (California, North Carolina, and New Jersey). See <https://insightpolicyresearch.com/projects/snap-process-improvement-idig/>. Details on project outcomes are expected sometime in 2018.

- What transparency, reporting, and oversight protections should be prioritized?

BUSINESS PROCESS MODERNIZATION:

As states continue experimenting with and expanding their use of modern business processes, stakeholders should continue to evaluate what techniques are working well, and why. Future research could explore:

- Successful examples or cautionary tales from states who have implemented:
 - Case banking (e.g. why some counties in North Carolina found success and others quickly abandoned the strategy)
 - Contact centers (e.g. especially states who have FNS' approval to conduct "on-demand interviews")
 - Online technology tools, including self-managed portals, smartphone apps for document upload (as seen in Texas), and text message reminders to increase retention (as seen in California)

IT SYSTEMS:

Because so many policy changes and data requests depend on the responsiveness of a state's eligibility system, stakeholders need to better understand what kind of system planning and decision-making is underway in their state. Future research could explore:

- Recommendations for advocates trying to gain a seat in or some process for information and input on governance structures, including success stories from advocates in other states
- Basics of procurement, federal-state cost sharing arrangements, and federal reporting requirements
- Key decisions during IT development affecting enrollment processes, access to data, and governance
- Case studies and lessons learned from recent IT overhauls, including both successes and failures

CASEWORKER TRAINING:

Because consistent policy implementation often depends on high-quality worker training, advocates requested a deeper dive into effective training models at the state, regional, and local levels. Future research could explore:

- Does centralized, regional, or local training work best, and why?
- Compare curriculum design (e.g. online vs. classroom), adult learning and confirmation of knowledge strategies, frequency of refresher trainings, etc.

POSITIVE CASE STUDIES:

Advocates expressed great interest in hearing success stories from their peers in county-administered states who have "cracked the code" and helped their states exceed national performance standards. Future research could explore:

- What are the advantages of county-administered states? Where has local flexibility worked best for clients?
- What examples of successes in county-administered environments exist? Which tasks have been thoughtfully centralized vs. left under county control?
- What are the main drivers of success in county-administered states? (E.g. strong individual leadership, external stakeholder engagement, legislative interest, etc.)
- How could effective county-administered states share lessons learned and be peer mentors to other states?

INTERCOUNTY TRANSFER:

Lastly, researchers did not investigate inter-county transfer (ICT) in the research but the authors know from anecdotal conversations that inter-county transfer (ICT) of SNAP households is an issue of considerable exploration and experimentation as counties seek reliable, cost-effective, and efficient ways to transfer case information without disruption of benefits. Opportunities for future research include:

- What current efforts are underway to improve ICT of SNAP cases in county-administered states?
- What protocols or practices are linked to improved outcomes for ICT households?
- Are there comparative models of case transfer between regions within state-administered states or case transfers from other programs?
- How can states assess county processes and measure ICT rates overall?

APPENDIX: STATUTORY OVERSIGHT LANGUAGE

CALIFORNIA: https://leginfo.legislature.ca.gov/faces/codes_displayexpandedbranch.xhtml?tocCode=WIC&division=9.&title=&part=&chapter=&article=

COLORADO: <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, Chapter 87,
<https://advance.lexis.com/container?config=00JAA5OTY5MTdjZi1lMzYxLTQxNTEtOWFkNi0xMmU5ZTViODQ2M2MKAFBvZENhdGFsb2coFSYEafv22IKqMT9DIHrf&crid=85fa9bdb-50ee-44e2-87f7-3d512d482178&prid=46feba43-4418-4b24-8e66-877fc45094a5#>

NORTH CAROLINA: 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 (See 50-34-11)

OHIO: <http://codes.ohio.gov/oac/5101:9-32-10v1>

MINNESOTA: <https://www.revisor.mn.gov/statutes/?id=256.017>

WISCONSIN: <http://docs.legis.wisconsin.gov/statutes/statutes/49/V/78/1>

VIRGINIA: <https://law.lis.virginia.gov/admincode/title22/agency40/>