FOOD STAMP PROGRAM CORRECTIVE ACTION PLAN

November 2008 Update



Rising Excellence

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Executive Summary

The Alaska Department of Health and Social Services (DHSS) is committed to improving Food Stamp Program payment accuracy. Error trends are identified through analysis of Quality Control (QC) data and plans are formulated to reduce or eliminate errors.

In federal fiscal year (FFY) 2007, Alaska's final Food Stamp payment error rate for active cases was **4.04** % which was below the national average of 5.64% and ranked Alaska 13th among States and 4th in year to year improvement. For the first half of FFY 2008, the payment error rate increased to **6.11** % which ranks Alaska 40th overall and 50th in a year to year comparison. The national average for the first half of FFY 2008 is at a historically low 4.69 %.

Alaska's final Food Stamp negative case error rate for denied, terminated, or suspended cases in FFY 2007 was **6.32** %, which ranked Alaska 28th among States and below the national average of 10.94 %. For the first half of FFY 2008, the negative error rate is **7.18** %, versus a national average of 9.71%, which ranks Alaska 32nd.

The November 2008 Food Stamp Program Corrective Action Plan focuses on the Quality Control reviews for FFY 2007 (October 2006 through September 2007) and the first six months of FFY 2008 (October 2007 through March 2008).

Alaska's Food Stamp Payment Accuracy Rates are as follows:

Active Payment Accuracy Rate: FFY 2007 Full Year Rate of 95.96 %

FFY 2008 Half Year Rate of 93.89 %

Negative Case Accuracy Rate: FFY 2007 Full Year Rate of 93.68 %

FFY 2008 Half Year Rate of 92.82 %

The chart below illustrates the progression of Alaska's active payment accuracy rate for FFY 2003 - FFY 2008, with major initiatives that were implemented.

| Year | Corrective Action Activity | Accuracy Rate |
|--------|---|------------------|
| FFY 08 | Standardized Case Review process statewideEnhanced Case Review Tool to identify trends | 93.89% |
| FFY 07 | Alaska implemented the Corrective Action Feedback and Evaluation (CAFÉ) Committee | 95.96% |
| FFY 06 | Alaska conducts Workload Analysis StudyDPA Reports Website | 94.19% |
| FFY 05 | Standardized Case Notes (CANO) implemented | 93.49% |
| FFY 04 | Alaska implemented Semi-Annual Reporting in January 2004 to help reduce client errors Regional Case Readers deployed Annual Statewide Learning Summits initiated Web Based Skill Challenges introduced | 93.04% |
| FFY 03 | Alaska implemented the Quality Assessment Review Committee (QARC) November 2003 Implementation of the statewide Case Review Tool Creation of Local Quality Councils | 86.12% |

I. INTRODUCTION

In the first half of federal fiscal year (FFY) 2008, the national average Food Stamp payment error rate was 4.69 %. Alaska's payment error rate was **6.11** %, which is a 2.07 % increase over the low payment accuracy achieved in FFY 2007 which was the best in at least fifteen years. At the beginning of FFY 2008, Alaska embarked on an effort to maintain the record low payment accuracy of FFY 2007, but is thus far experiencing the first increase in payment error rate in four years.

Alaska's negative Food Stamp case error rate in the first half of FFY 2008 was **7.18** %, better than the national average of 9.71%, but if maintained, would be the third year of an increased negative error rate.

The following table shows the progression of the state's active and negative error rates for the past ten years, compared to the national average. These rates are the official final rates that have been regressed and adjusted by the Food and Nutrition Service except for the first half of FFY 2008 which is state-reported.

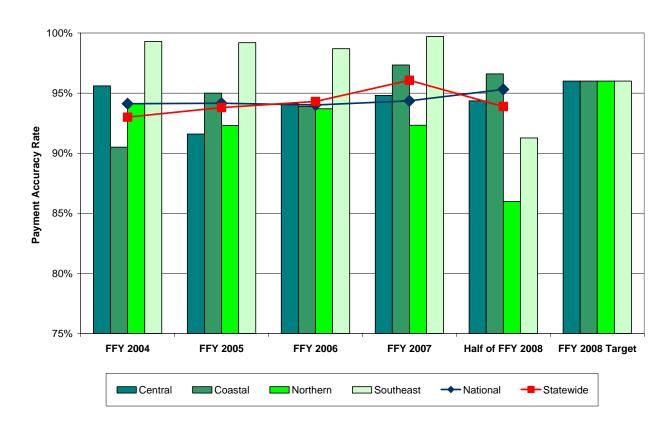
Alaska Historical Error Rates Actives and Negative, FFY 1999 to FFY 2008

| Federal Fiscal Year | Alaska Active Payment Error Rate | Active National Average | Alaska Negative Case Error Rate | Negative National Average |
|---------------------------|---|-------------------------------|--|---------------------------------|
| ½ of 2008 | 6.11% | 4.69% | 7.18% | 9.71% |
| 2007 | 4.04% | 5.64% | 6.32% | 10.94% |
| 2006 | 5.81% | 5.99% | 3.57% | 8.02% |
| 2005 | 6.51% | 5.84% | 0.89% | 6.91% |
| 2004 | 6.96% | 5.88% | 2.60% | 6.52% |
| 2003 | 13.88% | 6.63% | 3.11% | 7.64% |
| 2002 | 10.99% | 8.26% | 7.44% | 7.87% |
| 2001 | 9.69% | 8.66% | 4.17% | 8.31% |
| 2000 | 7.24% | 8.91% | 4.55% | 5.41% |
| 1999 | 15.94% | 9.86% | 4.71% | 2.61% |

In this Corrective Action Plan, the error rates are the unregressed and unadjusted rates unless the error rate is specifically identified as being the regressed and adjusted rate (as in the table above). The unregressed, unadjusted error rates represent state quality control actual findings, also called state-reported findings. The regressed error rate is an adjustment to the state-reported findings and takes into account any federal differences with state-reported findings and the number of reviews completed.

The following graph further illustrates Alaska's active payment accuracy for the past five years in comparison to the national average, and provides further delineation by Alaska region.

Recent History of Food Stamp Payment Accuracy Rates: National, Statewide, and Regional



Alaska met the FFY 2007 "Give Me Five" campaign, which strived for 95 % payment accuracy goal, with 95.96 % accuracy. Alaska raised the bar for FFY 2008 with the "Rising Excellence" campaign seeking 96 % accuracy. Achieving this lofty goal appears to be out of reach as the first six months of FFY 2008 resulted in 94 % accuracy.

Alaska completed 392 of the required 410 federal active reviews for FFY 2007. In FFY 2007 FNS Quality Control staff reviewed 50 % of the state's completed cases, plus 100 % of cases dropped as "not subject to review" or "incomplete". If FNS disagrees with the state finding, the difference (if upheld after arbitration) is factored into the regression adjustment. The other FNS adjustment to the rate is calculated based on how many of the required reviews are completed. Both adjustments are then added to the state-reported rate. The state-reported rate for FFY 2007 was 3.93 %. After adding the adjustments of 0.11 %, the official FNS rate was 4.04 %.

A similar process is followed when determining the negative case error rate. In FFY 2007 the State was required to complete at least 299 negative reviews and did complete 296 negative reviews. In FFY 2006 FNS reviewed 34 %of the completed cases, plus all cases dropped as "not subject to review".

This plan focuses on our new goal of 96 % accuracy for FFY 2008, and outlines the corrective actions to help us achieve it.

Section II of this report contains the analysis of errors and error trends. Section III addresses corrective action activities and initiatives, specifically addressed to the error elements that have the greatest impact on the state's error rate.

Federal Bonuses

The seven states with the highest payment accuracy and the three states with the most improved payment accuracy receive bonuses. Alaska received a \$205,389 bonus for most improved payment error rate from FFY 2003 to FFY 2004. Alaska just missed another most improved bonus from FFY 2006 to FFY 2007 with fourth in improvement nationwide.

Alaska Food Stamp Reinvestment Plans

The State of Alaska met its obligations under the FFY97, FFY98, FFY99, and FFY01 Reinvestment Plans. The plans aim to improve Food Stamp payment accuracy by state investment in corrective action initiatives with this purpose. The State still has FFY02 penalty money at risk for FFY 2005, and has negotiated with FNS to reinvest 100 % of its FFY 2005 at-risk amount. The state requested relief in spite of missing its target because it was able to reduce the error rate 6.92-percentage points between FFY 2003 and FFY 2004.

II. ANALYSIS OF ERRORS

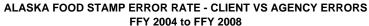
A. Methodology:

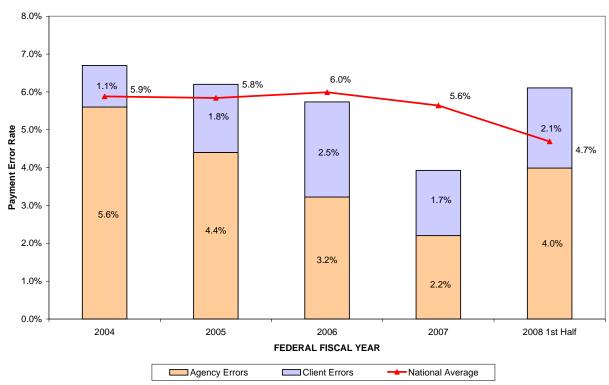
The primary data source for this report was the findings from the federally required QC review process conducted by the state.

Findings are listed as either dollar errors or case errors. A dollar error percentage rate (used for active reviews) is computed by dividing the dollar amount in error into the total dollars issued to sampled cases. A case error percentage rate (used for negative reviews) is determined by dividing the number of cases with countable errors into the total number of reviews completed.

B. Active Case Error Data Analysis:

Agency versus Client Errors





Alaska's payment error rate for FFY 2008 so far looks similar to FFY 2005, but the national averages are different by a full percentage point. Alaska will continue to seek ways to reduce client-caused errors; however, corrective action efforts are now mainly focused on reducing agency-caused errors.

Comparison of Primary Error Elements

This table provides information about the primary agency-caused errors found in FFY 2007 and 2008, based on QC data reported to FNS. It examines the number of times errors occurred in the various error elements, the total error dollars that occurred in each element, and the percent of error dollars to the total number of agency-caused error dollars.

Full Year

Agency-caused Errors

Primary Error Elements and Error Dollars

| | | | FFY 20 | 07 |
|-----|------------------------------------|----|---------|------------|
| | Element Code and Description | # | \$ | % of \$ |
| 311 | Wages and Salaries | 6 | \$1,002 | 33% |
| 150 | Household Composition | 5 | \$551 | 18% |
| 344 | TANF, PA, or GA | 2 | \$238 | 8% |
| 363 | Shelter Deduction | 6 | \$218 | 7% |
| 364 | Standard Utility Allowance | 3 | \$213 | 7% |
| 350 | Child Support Received | 4 | \$205 | 7% |
| 366 | Child Support Payment Deduction | 2 | \$173 | 6% |
| 151 | Recipient Disqualified | 1 | \$137 | 4% |
| 221 | Real Property | 1 | \$118 | 4% |
| 334 | Unemployment Compensation | 1 | \$55 | 2% |
| 331 | RSDI Benefits | 1 | \$54 | 2% |
| 346 | Other Unearned Income | 1 | \$46 | 2% |
| 323 | Dependent Care Deduction | 1 | \$40 | 1% |
| 111 | Student Status | | | |
| 365 | Medical Deductions | | | |
| 520 | Arithmetic Computation | | | |
| 160 | Employment and Training Programs | | | |
| 130 | Citizenship and Non-Citizen Status | | | |
| 335 | Workers Compensation | | | |
| | Total | 34 | \$3,050 | 100% |

| | | Half Ye | ear | | | | | | | |
|----|----|----------|------|--|--|--|--|--|--|--|
| | | FFY 2008 | | | | | | | | |
| of | | % of | | | | | | | | |
| \$ | # | \$ | \$ | | | | | | | |
| % | 3 | \$914 | 35% | | | | | | | |
| % | 1 | \$124 | 5% | | | | | | | |
| % | 2 | \$246 | 9% | | | | | | | |
| % | 1 | \$30 | 1% | | | | | | | |
| % | 1 | \$126 | 5% | | | | | | | |
| % | 1 | \$100 | 4% | | | | | | | |
| % | 3 | \$334 | 13% | | | | | | | |
| % | | | 0% | | | | | | | |
| % | | | 0% | | | | | | | |
| % | | | 0% | | | | | | | |
| % | | | 0% | | | | | | | |
| % | | | 0% | | | | | | | |
| % | 1 | \$61 | 2% | | | | | | | |
| | 1 | \$194 | 7% | | | | | | | |
| | 1 | \$184 | 7% | | | | | | | |
| | 2 | \$126 | 5% | | | | | | | |
| | 1 | \$66 | 3% | | | | | | | |
| | 1 | \$63 | 2% | | | | | | | |
| | 1 | \$26 | 1% | | | | | | | |
| % | 20 | \$2,594 | 100% | | | | | | | |

In FFY 2007 \$5,437 was paid in error. Of this amount, \$3,050 was in cases with agency errors and the remaining \$2,387 was in cases with only client-caused errors. In the first half of FFY 2008, \$3,972 was paid in error. Of this amount, \$2,594 was in cases with agency errors and with the remaining \$1,378 was in cases with only client-caused errors.

Wages and Salaries (Earned Income) errors, element code 311, represent 6 of 34 errors or 18 % of all active agency-caused errors reported to FNS in FFY 2007. However, these errors account for 33 % of agency-caused error dollars in FFY 2007, a disproportionate share of error dollars.

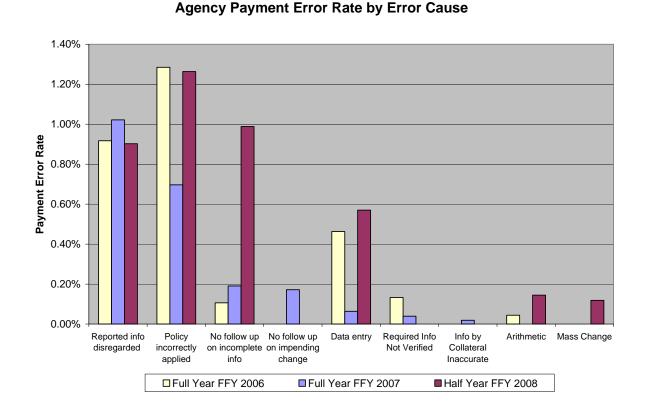
So far in FFY 2008, Wages and Salaries errors represent 15 % of cases and 35 % of the dollars in error. Child Support Payment Deduction errors are the other most prevalent error type at 15 % (3 of 20) of agency-caused error cases and 13 % of the error dollars.

Comparison of Primary Error Causes

The following table and chart compare the agency payment error rates for all error elements by cause category for FFY 2006, FFY 2007, and the first half of FFY 2008. The total agency payment error rate for FFY 2008, 3.99 %, is up more than a percentage point from the FFY 2006 and FFY 2007 rates of 2.95 % and 2.20 %. Agency-caused errors such as *Policy-incorrectly-applied* have emerged as the most costly to the program this year. Of additional concern is the cause description *No-follow-up-on-incomplete info*, which has risen to its highest level in three years.

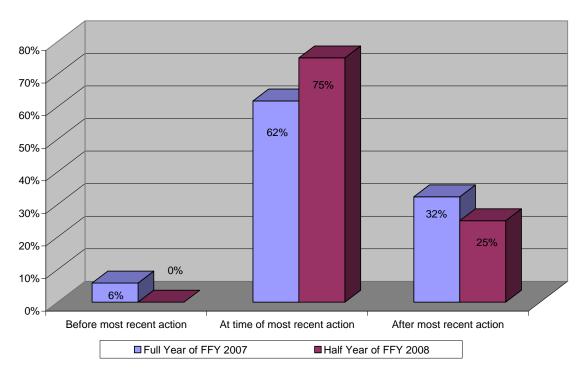
| | Causes | of | Agency | Errors |
|--|--------|----|--------|--------|
|--|--------|----|--------|--------|

| | Fu | ıll Year FF | Y 2006 | Fu | III Year FF | 2007 | Ha | If Year FF | / 2008 |
|----------------------------------|-------|-------------|----------|-----|-------------|----------|-----|------------|----------|
| Cause Description | Count | | FFY 2006 | | | FFY 2007 | | | FFY 2008 |
| Reported info disregarded | 13 | \$1,270 | 0.92% | 14 | \$1,415 | 1.02% | 6 | \$587 | 0.90% |
| Policy incorrectly applied | 15 | \$1,779 | 1.28% | 9 | \$965 | 0.70% | 6 | \$822 | 1.26% |
| No follow up on incomplete info | 2 | \$147 | 0.11% | 5 | \$264 | 0.19% | 3 | \$643 | 0.99% |
| No follow up on impending change | | | 0.00% | 2 | \$238 | 0.17% | | | 0.00% |
| Data entry | 3 | \$641 | 0.46% | 2 | \$88 | 0.06% | 2 | \$371 | 0.57% |
| Required Info Not Verified | 2 | \$184 | 0.13% | 1 | \$54 | 0.04% | | | 0.00% |
| Info by Collateral Inaccurate | | | 0.00% | 1 | 26 | 0.02% | | | 0.00% |
| Arithmetic | 1 | \$61 | 0.04% | 0 | \$0 | 0.00% | 2 | \$94 | 0.14% |
| Mass Change | | | 0.00% | 0 | \$0 | 0.00% | 1 | \$77 | 0.12% |
| TOTAL AGENCY ERRORS | 36 | \$4,082 | 2.95% | 34 | \$3,050 | 2.20% | 20 | \$2,594 | 3.99% |
| Total Food Stamp Sample | 386 | \$126,633 | | 392 | \$138,469 | | 194 | \$65,051 | |



As illustrated in the following chart, most agency errors occur at the time of the most recent certification or recertification. In FFY 2008 so far, 75% of the errors occurred at the time of certification or recertification. Focusing case review efforts here will increase the likelihood of catching and correcting errors, and utilizes case reviewer and supervisory resources most effectively.

When Agency Errors Occur in Relation to the Most Recent Certification/Recertification (Percent of Error Cases)



C. <u>Negative Case Errors:</u>

In FFY 2007, Alaska reported 16 negative errors for a negative case error rate of 5.41 %. The national average was 10.94 %. In the first half of FFY 2008, Alaska has 13 errors for a 7.18 % error rate while the national average is 9.71 %. Alaska's negative cases (denied, terminated, or suspended) have maintained an error rate consistently below the national average for the past nine years.

Five of the 16 negative errors in FFY 2007 were due to an error in the application process. Seven of the 13 negative errors for the first six months of FFY 2008 are in the same category. Over the last 18 months, these 12 application errors do not comply with the following three Alaska Food Stamp Manual requirements:

•Eight of twelve errors: "When a food stamp applicant fails to appear for a scheduled interview, EIS notice F000 FS Application – Missed Interview, must be

sent informing the household that it missed the scheduled interview and that it is responsible for rescheduling an interview."

- •Three of twelve errors: "An application cannot be denied for failure to participate in an interview prior to the 30th day from the application filing date."
- •One of twelve errors: "A household may not be determined ineligible solely because we cannot get the information from a third party."

Had Alaska avoided these twelve application process errors, its ranking would have jumped from 28th to 14th in FFY 2007 and from 32nd to 20th in the first half of FFY 2008.

D. Quality Control Case Reviews Not Completed:

Not Completed Rates in the following table are determined by dividing the Not Completed reviews by the Reviewable Cases (the Sampled Cases less the Not Subject to Review cases). If the non-completion rate is above 2%, states incur a completion rate adjustment to their combined payment error rate (CPER) which is the final regressed and adjusted payment error rate. The official Not Completed rate can be higher than in the table if the reviewable cases are less than the required minimum sample. In FFY07 Alaska's completion rate adjustment added 0.11% to the final error rate.

Reviews reported as *Not Subject to Review* are not counted against the state's completion rate. *Not Subject to Review* cases are commonly those households that have moved out of state, have died, or cannot be located after several documented attempts. *Not Completed* cases do count against the state's completion rate and include those cases in which the client has refused to cooperate in the review process and the state has been unable to reach a likely conclusion regarding the household's eligibility and benefit amount from available information. In these situations, clients are placed in sanction and do not receive further food stamps until they cooperate in the review process, or ninety-five days have passed since the end of the federal fiscal year (usually January 3 of the next year).

Not Completed cases also include those situations where the client cooperated, but collateral sources did not cooperate or return needed information for mandatory verifications, and the state has been unable to reach a likely conclusion regarding the household's eligibility and benefit amount.

Dropped Cases

| Dropped Cases | | | | | | | |
|---------------|---------------|-----------------------------|--------------------|---------------------|-------------------|--------------------|--|
| | Sampled Cases | Less: Not Subject to Review | = Reviewable Cases | Less: Not Completed | = Completed Cases | Not Completed Rate | |
| FFY 2004 | | | | | | | |
| First Half | 170 | -16 | 154 | 0 | 154 | 0.0% | |
| Second Half | 209 | -20 | 189 | -11 | 178 | 5.8% | |
| Cocona Han | 379 | -36 | 343 | -11 | 332 | 3.2% | |
| FFY 2005 | | | | | | | |
| First Half | 205 | -11 | 194 | -4 | 190 | 2.1% | |
| Second Half | 245 | -14 | 231 | -20 | 211 | 8.7% | |
| | 450 | -25 | 425 | -24 | 401 | 5.6% | |
| FFY 2006 | | | | | | | |
| First Half | 210 | -6 | 204 | -10 | 194 | 4.9% | |
| Second Half | 221 | -15 | 206 | -14 | | 6.8% | |
| | 431 | -21 | 410 | -24 | 386 | 5.9% | |
| FFY 2007 | | | | | | | |
| First Half | 209 | -12 | 197 | -9 | 188 | 4.6% | |
| Second Half | 230 | -19 | 211 | -7 | 204 | 3.3% | |
| | 439 | -31 | 408 | -16 | 392 | 3.9% | |
| FFY 2008 | | | | | | | |
| First Half | 217 | -15 | 202 | -8 | 194 | 4.0% | |

III. CORRECTIVE ACTIONS

Alaska remains committed to Food Stamp Program payment accuracy. Over the years, DHSS has implemented numerous processes focused on lowering the error rate. Examples include:

- *Implementation of the statewide Case Review Tool
- *Adoption of Semi Annual Reporting
- *Prospective Budgeting
- * Quality Assessment Review Committee (QARC)
- *A process to ensure that QC errors found in the QARC process are being corrected
- *Local Quality Councils comprised of staff who strive to develop process improvements at the office level
- *Regularly updated on-line policy manuals, regional case reviewer positions
- *Standardized case notes (CANOs)
- *Increased involvement by supervisors in leadership meetings, training and mentoring staff
- *Annual statewide training workshops
- *DPA employee web site home page with constant focus on Food Stamp accuracy
- *DPA eNews.

Most recently, Alaska implemented the Corrective Action Feedback and Evaluation (CAFÉ) Committee to address and monitor the corrective actions outlined in the Corrective Action Plan.

Key Initiatives

One of the most significant payment accuracy initiatives has been the Quality Assessment Review Committee (QARC). Launched in 2003, it is the main forum for reviewing all quality control errors, whether active or negative. All errors are thoroughly examined within our Quality Assessment Unit, but the QARC provides a final evaluation of each error to determine if all policies were correctly applied. In addition, the substance of each error is reviewed to determine trends, system changes, training needs, and other corrective actions needed to prevent future occurrences of the same type of error. Discussions of case errors at the QARC are also a primary source for articles for the Division's electronic newsletter DPA eNews. The committee reviews error cases from other programs as well, which can lead to beneficial changes that also affect the Food Stamp Program.

Another initiative involves the adoption of standardized case note (CANO) formats in our Eligibility Information System to help eligibility workers reduce the instances of overlooked eligibility criteria. This also helps workers document their actions and

findings consistently statewide and helps prevent errors when cases are transferred between local offices.

A common theme throughout all error elements is the prevalence of agency-caused errors. Workers not knowing what action to take, and workers not taking any action on the reported information most commonly cause these errors. Training addresses the first problem, as the purpose of training is to teach people what action needs to be taken and how to do so correctly. The second issue is more difficult. Quality Assessment and supervisory staff will be working with eligibility staff to identify critical points in the process. This information will be used to identify and recommend needed improvements.

For FFY 2007, we identified the top four agency-caused payment errors by identifying the dollar amount of these errors in relation to the amount of all agency error dollars. The top four errors (below) account for 66 % of all agency-caused dollar errors.

The top four agency-caused payment errors that occurred in FFY 2007 are:

- Earned Income, 33%
- Household Composition, 18%
- TANF, PA or GA, 8%
- Shelter Deduction, 7%

A. Corrective Action on Top Four Errors

Earned Income, Element 311:

The six agency-caused earned income errors (totaling \$1,002) accounted for 33 % of all agency-caused error dollars in FFY 2007.

Cause:

As illustrated below, Alaska's largest payment errors are due to incorrect application of policy and reported information disregarded. Incorrect application of policy occurred when: the worker lacked documentation to exclude earnings, the worker did not follow up on incomplete information, incorrect conversion factors were applied, and case processing was untimely. . *Reported information disregarded* occurred when reported wages were not addressed.

Causes of Agency Wages and Salaries Errors

| | Full Year | | Half \ | Year |
|------------------------------------|-----------|---------|----------|---------|
| | FFY 2 | 2007 | FFY 2 | 2008 |
| Cause Description | Dollars | Percent | Dollars | Percent |
| Policy Incorrectly Applied | \$669 | 1.03% | \$368 | 0.57% |
| Reported information disregarded | \$263 | 0.40% | \$0 | 0.00% |
| No follow up on incomplete info | \$70 | 0.11% | \$275 | 0.42% |
| Data entry error | \$0 | 0.00% | \$271 | 0.42% |
| Arithmetic error | \$0 | 0.00% | \$0 | 0.00% |
| Total Agency Responsibility Errors | \$1,002 | 1.54% | \$914 | 1.41% |
| Total Food Stamp Sample Allotment | \$138,469 | 100.00% | \$65,051 | 100.00% |

Corrective Actions:

Supervisors and Regional Case Reviewers focus ongoing review efforts on work performed by new caseworkers and on high allotment earned income cases. This supplements the more formal classroom training provided by the Staff Development and Training (SD&T) Unit, and provides on-going and constant feedback within the offices. A number of additional initiatives are underway at the state, region and office level to promote payment accuracy. All of the initiatives described in Section C below have improvement of payment accuracy in cases with earned income as a primary focus. In addition, the updated corrective action planning record is presented in Section E.

Household Composition, Element 150:

The five agency- caused Household Composition errors (totaling \$551) accounted for 18 % of all agency-caused error dollars in FFY 2007.

Cause:

Agency-caused errors occurred when: policy was applied incorrectly regarding certification periods, a household reported a new member and they were not included in the case, the agency included a child that was not in the home, a change was reported on an application that was not processed, and a household member was reported away at college yet still included in the household.

Corrective Action:

Efforts have been made each year to identify ways to reduce the number of errors caused when eligibility workers do not take action, or do not take the correct action, on reported changes. Alaska plans to further enhance its corrective action strategies through training to help managers and supervisors gain the ability and knowledge to assess data and identify error trends and causal factors.

TANF, PA and GA, Element 344:

Two agency-caused errors (totaling \$238) accounted for 8 % of all agency-caused error dollars in FFY 2007.

Cause:

These errors occurred when the eligibility worker did not act on alerts, and when a case with multiple programs was worked in different offices by different eligibility workers.

Corrective Action:

Training was provided to staff on acting on impending changes, and procedures were established for shared cases.

Shelter Deduction, Element 363:

The six agency-caused Shelter Deduction errors (totaling \$218) accounted for 7 % of all agency-caused error dollars in FFY 2007.

Cause:

These errors were due to: incorrect computation of mortgage/rental income, the worker assuming homeless meant no shelter expenses, reported and verified expenses were disregarded, and auto insurance was considered homeowner's insurance.

Corrective Action:

The Division has a work group focused on improving training and work flow processes. Efforts are also being focused on identifying ways to reduce the number of errors caused when eligibility workers do not take action, or do not take the correct action, on reported changes.

B. <u>Corrective Action on Other Error Trends</u>

Errors by Time of Occurrence

As noted in Section II of this report, Alaska reported that in FFY 2007, 62 % of errors occurred before or at most recent certification. Alaska is reviewing its processes to determine if case reviewer, supervisory and other staff resources can be used more effectively to identify and correct errors at re-certification and certification.

C. Ongoing Payment Accuracy Initiatives:

The initiatives listed below involve ongoing long-term implementation plans.

Focused Case Reviews:

Intensive case reviews by supervisors and case reviewers are being used in all regions to address specific issues identified through QA reviews, Management Evaluation reviews, and Local Quality Councils. Ongoing review efforts target work performed by new caseworkers and on high allotment earned income cases. These reviews supplement the more formal classroom training provided by the Staff Development and Training (SD&T) Unit, and provide on-going and constant feedback within the offices.

Quality Assessment Review Committee (QARC):

Initiated in November 2003, the QARC meets every month. It is the primary statewide forum for discussing food stamp errors, trends, and action steps for improvement. We believe the greatest impact is in improved communication and in identifying training needs, unclear policies, and automation enhancements needed to improve operating systems. The state's error rate is reduced by an average of 2 percentage points because cases are reviewed by the QARC. The Quality Assessment Unit also sends "Case Correct" recognition pins to the local offices for all workers with cases reported as correct.

Corrective Action Feedback and Evaluation (CAFÉ) Committee:

The CAFÉ meets monthly to address and monitor the corrective actions outlined in the Corrective Action Plan. The CAFÉ is comprised of representatives from the Policy and Program Development Unit, Staff Development and Training, Systems Operations, Quality Assessment, the Chief of Field Services, and each Field Services Region. The CAFÉ works collaboratively to implement and monitor the corrective actions that were identified and prioritized during the Corrective Action Planning meeting as having the greatest impact in addressing Food Stamp Program errors.

DPA Electronic Newsletter:

The newsletter, *DPA ENews*, is issued quarterly throughout the year and has replaced "*QARC Rules*" as the source of feature articles drawn from Quality Control errors discussed by the QARC. Recent issues have covered the "Notice of Missed Interview", following up on Quality Assessment errors, the Food Stamp certification period for semi-annual reporting households, notifying households about shelter costs that have not been verified, and using the eligibility system's advance issuance indicator for expedited food stamp situations. Prior issues of DPA eNews can be viewed at:

http://dpaweb.hss.state.ak.us/training/enews/index.html

DPA Web:

The DPA employee home page provides a "Quicklink" to the state's Food Stamp year-to-date accuracy rate and the error rate as a four-month running average. The Reports link, , which is updated every month, provides the user with a current analysis of errors on Food Stamp active cases including our national ranking and a breakdown of case and payment accuracy by Region and District Office. Periodic updates on the Division's progress in its "Rising Excellence" Food Stamp Accuracy Campaign are featured on the employee home page to

promote continuous focus on Food Stamp accuracy. The Division's employee home page can be viewed at: http://dpaweb.hss.state.ak.us/

Skill Challenges:

The Staff Development & Training Unit has produced a number of "Skill Challenges" as a means of providing ongoing refresher training on topics that are problematic for staff. The challenges are web based interactive training videos that provide an interesting and stimulating means of delivering targeted training. Each "Challenge" includes a quiz and links to the policy manual for further information. Topics include: Certification/Recertification, the Food Stamp Challenge, Semi-Annual Reporting, Estimated Income, and treatment of PFD Hold Harmless income. The "Skill Challenges" can be viewed at: http://dpaweb.hss.state.ak.us/training/Quiz/QuizMain.htm

Food Stamp Program Management Evaluation Reviews

Alaska conducts periodic management evaluation reviews of program administration in local offices, focusing on the priority review topics established annually by FNS. In addition to interviews with staff, the review team examines office performance history and related documentation in advance of and during the review. Payment accuracy and corrective action follow-up and planning are an integral part of the reviews.

Food Stamp Program Quality Assessment Report

The Program Integrity and Analysis Unit produces an annual Food Stamp Program Quality Assessment Report. The report describes the Quality Control process and the Division's progress in reducing Alaska's Food Stamp payment error rate. Region and office level payment error findings are presented, as well as comparisons to other Western Region States. The report is another tool available to help managers analyze and address payment errors at the region and local office level.

http://dpaweb.hss.state.ak.us/QA/PDF/FoodStampReportFFY2007.pdf

D. Case Review Non-Completion:

FNS reviews all cases reported as "incomplete" or "not subject to review".

Active case reviews:

Federal quality control requirements state that a quality control review may be reported as incomplete if the sampled case meets certain requirements. If incomplete reviews comprise more than 5 % of the sample, the state must identify corrective action.

In FFY 2007, 16 cases were subject to review but not completed. This represents 3.9 %t of all completed active cases, thus corrective action is not required.

E. <u>Detailed Corrective Action Plans:</u>

Staff representing the Policy and Program Development Unit, Staff Development and Training, Systems Operations, Program Integrity & Analysis, Quality Assessment, the Chief of Field Services, and each Region, has collaborated in the development of these corrective actions, and in monitoring them through the CAFE. The corrective actions in the Corrective Action Planning Record on the following pages focus on the top agency-caused payment error elements and other identified error trends.

Problem: Earned income errors in FFY 2007 accounted for 33 percent of agency-caused

error dollars

Outcome: Reduce agency-caused earned income error dollars to less than \$1,000 in FFY 2008

Monitoring/Feedback: All Corrective Actions will be monitored and evaluated regularly

| # | Corrective Action | Measurement Strategy | Lead Responsibility | Status Update | Status |
|-------|--|---|------------------------------------|------------------|---|
| E-1 | Clarify policy manual sections related to estimating earned income | Pertinent sections identified Target date for revisions established Manual changes implemented | Policy & Program Development | | Completed: July 2008 manual change |
| E-2 | Establish a new EIS screen to track and compute wage information | Work Request assigned to priority level 1 or 2. Work Request assigned to a PAA Statewide implementation complete | SYSOPS | Feb 09 | WR 5032 submitted 4/99 is outdated and needs to be reviewed and updated before it's ready for SYSOPS to assign - awaiting input from Regional Managers. |
| E-3,4 | Completed and removed | | | | |
| E-5 | Profile high risk income/high allotment cases | High risk target cases profiled for each region High risk target cases profiled for each office Number of target case-types for review established by office Number of target cases reviewed | Program Integrity & Analysis | Feb 09 | Managers to provide feedback on data needs or changes. Target numbers for high risk case reviews need to be established by office. Case Review Tool data needs to be available before office level data can be examined. Quarterly report of all QC errors provided by PIA in May, Aug, Nov & Feb Annual report by PIA of error elements, causes and other factors for past three fiscal years to help identify high risk cases. Provided 3/08. |

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Problem: Earned income errors in FFY 2007 accounted for 33 percent of agency-caused

error dollars

Outcome: Reduce agency-caused earned income error dollars to less than \$1,000 in FFY 2008

Monitoring/Feedback: All Corrective Actions will be monitored and evaluated regularly

| # | Corrective Action | Measurement Strategy | Lead Responsibility | Status Update | Status |
|-----|---|---|--|------------------|--|
| E-6 | Require regular refresher training for all staff | Training plan developed Attendance sheets Knowledge assessments conducted post training Case reviews | Field Services, SD&T | Feb 09 | Spring 08 e-News article and Skill Challenge on estimating seasonal income. SD&T and Field Services use the new measuring learning tool for regular classroom training. RM and SD&T are working on establishing a plan and schedule for refresher trainings. SD&T will track attendance at trainings. |
| E-7 | Establish reviews of identified high risk cases by office | "X" amount of reviews completed by each office per quarter will appear on case review system | Field Services / Regional Managers | May 09 | Review standards established for new workers, workers adding another program, ET II's, and ET III/new lead workers/regional case reviewers. Update on status of implementation at May 09 CAFE. |
| E-8 | Provide standardized case load management tools to ETs | Tools provided to ETs | Field Services | Feb 09 | Field Services is putting together a work group of subject matter experts to develop a desk guide to include reports, calendars and key tools. It will be used as orientation for new workers and a tool for coaching ongoing workers. |

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Problem: Earned income errors in FFY 2007 accounted for 33 percent of agency-caused

error dollars

Outcome: Reduce agency-caused earned income error dollars to less than \$1,000 in FFY 2008

Monitoring/Feedback: All Corrective Actions will be monitored and evaluated regularly

| # | Corrective Action | Measurement Strategy | Lead | Status | Status |
|-----|---|--|---|--------|---|
| | | | Responsibility | Update | |
| E-9 | Analyze the type of EAIN errors (fishing, self-employement, military, etc.) and in partnership with Policy and SD&T develop field staff check lists / training aids | Final work product collected and posted in centralized access area | Field Services / Regional Managers, SD&T, Policy, PIA | Mar 09 | More detail on types of EAIN errors is needed. Case Review Tool enhancement is needed to identify root cause. Status update after CRT enhancements are completed. |

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Problem: More errors tend to occur at re-certification than at certification

Outcome: Reduce payment error rate of benefit issuance at re-certification by 10% in FFY 2008 (from 3.0 to

2.7%)

Monitoring/Feedback: All Corrective Actions will be monitored and evaluated regularly

| # | Corrective Action | Measurement Strategy | Lead Responsibility | Status Update | Status |
|-----|---|---|---------------------------|------------------|---|
| R-1 | Develop standard requirements for interface checks and provide comprehensive interface training | Interfaces and protocol for use evaluated Alerts generated by each interface evaluated Standard requirements for interface checks developed Training plan established Number of caseworkers trained | TBD – multi- unit task | Jan 09 | The QA-developed draft PowerPoint presentation is being provided to Regional Managers, SD&T, Policy & SYSOPS. Representatives from SD&T, QA, SYSOPS, Field Services & Policy will meet 1st week of Dec as the interface training work group. The online Interface Manual needs to be updated. |
| R-2 | Standardize case review process statewide | Standard requirements for case reviews developed - Training plan established Number of reviewers trained | Field Services | Dec 08 | Prior to coming together as a group the Regional Managers are working within their regions on the issue of tracking trends on <\$26 errors without impacting performance evaluation process. Revisions to case review guidelines have been drafted including incorporation of PERM. The guidelines will be posted to the web as soon as they are finalized including the <\$26 issue. Completed: Managers provided input on needed case review tool modifications. Completed: Aina submitted a case review training plan and these activities are underway and |

Problem: More errors tend to occur at re-certification than at certification

Outcome: Reduce payment error rate of benefit issuance at re-certification by 10% in FFY 2008 (from 3.0 to

2.7%)

Monitoring/Feedback: All Corrective Actions will be monitored and evaluated regularly

| # | Corrective Action | Measurement Strategy | Lead Responsibility | Status Update | Status |
|-----|--|---|------------------------------------|------------------|---|
| | | | | | being funded by FS Reinvestment dollars. |
| E-5 | Profile high risk income/high allotment cases | High risk target cases profiled for each region High risk target cases profiled for each office Number of target case-types for review established by office Number of target cases reviewed | Program Integrity & Analysis | | See E-5 on Page 1 |
| R-4 | Address issues with the GEN 72 form - develop a new form or use the GEN 50 instead of the GEN 72 | Issues with GEN 72 identified Options and strategies to replace GEN 72 identified and evaluated | Policy & Program Development | Mar 09 | It is anticipated that staff resources will be available to work on revising the GEN 72 in the spring. Replacing GEN 72 with GEN 50 isn't feasible. Multiple mailings problem may be resolved with new printer. |
| R-5 | Removed | | | | |
| R-6 | Implement intranet web site to share best practices | Explore feasibility and outline tasks necessary to establish and maintain the web site | Operations Support & QA | Dec 08 | DPA is in the process of implementing Microsoft SharePoint which provides a way to share best practices. PI&A will be assisting with implementation. PI&A Section Chief will confirm we are still planning to use SharePoint rather than DPA web. |

Problem: More errors tend to occur at re-certification than at certification

Outcome: Reduce payment error rate of benefit issuance at re-certification by 10% in FFY 2008 (from 3.0 to

2.7%)

Monitoring/Feedback: All Corrective Actions will be monitored and evaluated regularly

| # | Corrective Action | Measurement Strategy | Lead | Status | Status |
|-----------|---|---|--|--------|--|
| R-7 | Removed | | Responsibility | Update | |
| R-8 | Add CASS to the CANO format | Case reviews will identify discrepancies between the CASS and the CANO | Field Services | Jan 09 | A CANO format revision team has been formed. The CASS will be part of this project. |
| S-1- 3 | Removed | | | | |
| S-4 | Use caseload management reports to track the number of recerts due each month to see if staggering re-cert dates could level out peak processing months | Identify any barriers to using reports to track number of recerts due each month Review report data to identify possible re-cert staggering month(s) Determine if the benefits of staggering outweigh costs | Central, Coastal, Northern & Southeast Regional Mgrs | Oct 09 | Completed: Work Requests 5970 & 5749 were migrated on 6/12/08 with accompanying broadcast & user guide. WR 5792 was completed along with 12/07 printing enhancement. RM's provided feedback on report use. Work Request may be needed to add face-to-face interviews to report. Use of this report to be added to subject matter experts and caseload organization project (see E-8). |

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Problem: Application denial & termination error rate is too high

Outcome: Reduce the percentage of incorrect denials/closures in QA negative sample by 25% in FFY 2008 (from 5.4% to 4.0%)

Monitoring/Feedback: All Corrective Actions will be monitored and evaluated regularly

| # | Corrective Action | Measurement Strategy | Lead Responsibility | Status Update | Status |
|-----|--|--|------------------------|------------------|---|
| N-1 | Develop training tool/checklist for proper procedure for closure and application denial (include examples). | Guidance is available to 100% of eligibility staff | Field Services | Jan 09 | Central and SERO are piloting the check sheet through 12/1/08. |
| N-2 | Checklist completed and placed in file by ET taking action. | Case reviews verify that completed checklist is in the file | Field Services | Jan 09 | See above. |
| N-3 | Increase the number of negative case action reviews conducted and recorded in the Case Review Tool | Monitor review volume on Case Review Tool by location (or unit- level if possible) | Field Services | Jan 09 | Reporting functions of the case review tool don't distinguish between active & negative reviews. The CRT enhancements are in testing. Offices are including negative reviews in mandatory samples. Aina has the lead on this as well as N-4 and N-5. |
| N-4 | Create report or sampling tool for office/unit selection of negatives for review | Work request or sample successfully developed | Field Services | Jan 09 | See N-3 |
| N-5 | Update Case Review Guide to include guidance on negative action reviews. Train reviewers on review and data entry process. | Review guidelines updated with requirement for proper data entry for negative reviews Develop training plan and assure reviewers know the process for case selection and review | Field Services | Jan 09 | See N-3 |

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