# Department of Social and Health Services

## Olympia, Washington

#### **EAZ Manual**

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Category Quality Assurance

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### **Summary**

Updated EAZ Chapter: <u>Quality Assurance</u> to update the chapter to "Quality Control" and remove outdated language.

See below for new text:

# **Quality Assurance Control**

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# **Purpose:**

The Quality Control (QC) review process conducted by ESA's Office of Quality Assurance the Division of Program Integrity (DPI) Quality Control team is designed to measure payment accuracy in the federal food assistance and eash programs. The review process also provides information to identify error concentration and trends to evaluate program effectiveness.

# WAC 388-464-0001 Am I required to cooperate with quality assurance?

• Clarifying Information and Worker Responsibilities

# Clarifying Information - WAC 388-464-0001

# 1. Quality Control Team:

As a condition of receiving federal funds for the administration of the food assistance program (Basic Food Program/Supplemental Nutrition Assistance Program - SNAP) the federal government requires states to maintain a Quality Control system. The Quality Assurance-Control (QCA) team-section must:

- a. Review a statistically valid statewide sample,
- b. Compile and analyze review findings to determine numbers and types of errors, and;
- c. Aid in establishing corrective action plans.

### 2. Review sampling:

- The Review Sample Time Period covers the federal fiscal year (FFY) which runs from October 1<sup>st</sup> of one calendar year through September 30<sup>th</sup> of the following year.
  - a. Cases are selected for review at random from active recipients of food and eash assistance benefits. This is identified as the active sample.
  - b. A random negative sample, also known as Case and Procedural Error Rate (CAPER) sample, is also drawn from denied, terminated, and suspended case actions.

#### 3. Case review process:

- The QA QC review process typically includes:
  - a. An review of the electronic file and case record review.
    - b. A field investigation including an in personal interview with the recipient.
    - c. Verification of all eligibility factors.
    - d. A determination of the correctness of payment and benefit eligibility.
    - e. A report of the findings to ESA's Community Services Division (CSD), Aging and Long-Term Support Administration's Disability Services Administration's Home and Community Services (ADSAALTSA/HCS), Developmental Disabilities Administration (DDA) and to the federal government.

## 4. Federal quality Quality control review:

<u>a.</u> Federal quality control staff reviews a random sample of cases completed by state <del>QA-DPI QC</del> <u>team</u> to validate the review findings.

<u>b.</u> If Federal quality control results are different than the original state findings, and state <u>QA-QC</u> team agrees with those results, <u>QA-QC</u> will notify ESA/CSD-or, <u>ADSAALTSA/HCS\_or DDA</u> for necessary action(s).

5. **Exempt errors:** Food assistance errors, with the exception of ineligible cases in any amount, that result in an error amount of less than \$39 are not counted in the federal QC error rate.

# Worker Responsibilities - WAC 388-464-0001

1. Notifying Customers of Quality Control Reviews:

<u>DPI</u> notifies customers that are randomly selected for a QC review by letter and/or phone call. If a customer or authorized representative calls CSD, ALTSA, or DDA and indicates they have been contacted by DPI for a QC review:

- a. Remind the customer or authorized representative that they will need to cooperate with the QC reviewer.
- b. Notify the customer or authorized representative that the results for not cooperating with the QC review process is disqualification. See #3 **Period of Non-Cooperation QC Sanction.**

# 1.2. Non-cooperation and QC sanction:

- a. If the household refuses to cooperate in the QC review process, the <del>QA-QC</del> reviewer will notify the appropriate agency contact persona DPI worker to take action-immediately after verifying the customer's Equal Access (EA) plan. The notice will contain:
  - i. The specific reason(s) for the non-cooperation determination Notification the household has refused to cooperate with the review process;
  - ii. The period of ineligibility;
  - iii. What the elient-customer can do to end the QC sanction; and
  - iv. The phone number and QA-QC reviewer name for future contact.
    - b. Upon receipt of the notice of non-cooperation, the FSS DPI worker must take the following action:
  - . Review the customers EA plan and Nnotify the elient-customer or authorized representative immediately that the entire food assistance household or TANF/SFA assistance unit benefits will be terminated.
  - i. The effective date of termination is the first of the month following the end of the 10-day advance notice period.
  - <u>ii.</u> The notice should contain the following:
    - The specific reason for the non-cooperation determination;
    - The QC sanction time period-and if the client is non-cooperating for both food assistance and TANF/SFA, include both time periods;
    - What the <u>elient customer</u> must do to end the QC sanction;
    - That aAn overpayment may have occurred, and;
    - The phone number of the QA-QC reviewer/unit.
- c. The FSS DPI worker must terminate benefits unless QA QC notifies the FSS the DPI worker the QC sanction is lifted.

- d. If unable to terminate TANF/SFA benefits prior to the first of the month, the FSS should take the following action for TANF/SFA assistance units:
- . Establish an overpayment from the first of the month following QA's determination of non-cooperation for TANF/SFA, and;
  - i. Include the advance notice time period.
  - e.d. For food assistance household's, the FSS-DPI worker must terminate benefits effective the first of the month following the end of the 10-day advance notice period.

# 2.3. Period of Non-Cooperation QA-QC Sanction:

A household that is sanctioned for not cooperating in the Basic Food quality control review is ineligible for one hundred twenty-five days after the end of the annual federal review period (i.e. February 2<sup>nd</sup>) in which the case was selected for review, unless the household cooperates with QA-QC before the end of the federal review period. The annual federal review period begins October 1 and ends September 30 each year (e.g., federal fiscal year 2012-2021 (FFY 2012-2021) begins October 1, 2011-2021 and ends September 30, 2012-2022).

#### **EXAMPLE:**

<u>Julie's-Jordan's</u> case was selected for review in October <u>20112021</u>, the first month of the federal fiscal year. In November <u>20112021</u>, <u>she they</u> refused to cooperate with the <u>QA-QC</u> review, and <u>her their</u> household was sanctioned effective December 1, <u>20112021</u>. Unless she cooperates with <u>QAQC</u>, <u>her their</u> sanction period will continue through February 2, <u>2013</u> <u>2023</u> (which is 125 days after the end of the federal review period that ends September 30, <u>20122022</u>).

#### **EXAMPLE:**

Ron's Than's case was selected for review in September 20122022, the last month of the federal fiscal year 20122021. If the household refuses to cooperate with QAQC, the household's sanction ends February 2, 20132023; the same as in the above example.

### 3.4. Re-application after termination due to QC non-cooperation sanction:

- If an applicant that has been terminated from assistance due to a QC non-cooperation sanction and reapplies before the end of the QC sanction period, review the case record for a notice of cooperation from QAQC. If there is none, notify the QA-QC reviewer/unit the elient customer is reapplying and document the response from QA-QC on the narrative screen in ACES.
- a. —a. Staff should ensure that the customer has complied with the QC process before approving food assistance if within their QC sanction period. If the applicant has cooperated with QA, determine eligibility in accordance with the procedures found in the Applications—category of this manual.
- b. If the applicant has not cooperated with QAQC and is within their QC sanction period:
  - 1. Authorize assistance effective the date all eligibility factors are met, including cooperation with QC.
  - 1.2. Refer the applicant to QA QC to complete the QC review process; and

- 2.—Pend the application for cooperation with QC, but request the necessary verification of current circumstances;
- <u>c.</u> If the applicant continues to not cooperate with <del>QAQC</del>, deny the application no later than 30 days from the date of application.
- <u>d.</u> For an applicant who reapplies after the QC sanction period expires, verify all eligibility requirements. After the QC sanction period expires, no referral to <u>QA-QC</u> is necessary.
- <u>e.</u> If the individual cooperates with <u>QA-QC</u> after the sanction has begun, the individual must complete a new application to be eligible for benefits.

#### **EXAMPLE:**

QA-QC sanction for non-cooperation is imposed beginning July 1. The elient-customer cooperated with QA-QC on July 10. If the elient-customer wishes to receive Basic Food, the elient-customer must complete a new application and complete the application process. Eligibility begins the date the application is received.

#### EXAMPLE:

Jordan is sanctioned for non-cooperation with QC review beginning February 1. Their food assistance is closed. April 15, Jordan reapplies for Basic Food. The PBS confirms that Jordan has not cooperated with the QC reviewer. Jordan complies with the QC review process on May 10. Jordan's is eligible for Basic Food starting May 10.

- 5. Quality assurance Control review findings:
- e.a. Quality assurance QC reviews focus on correctness of eligibility and payment in a specific review month. The findings from the review are reported via the DSHS 05-012A(X), which is electronically transmitted to the ECR.
  - d.b. For correct cases, no action is required by the FSS Public Benefit Specialist (PBS) unless other information is supplied which affects the elient's customer's eligibility. The FSS PBS is responsible for evaluating the information and taking appropriate action.
  - e.c. For error incorrect cases, the report from QA-QC should contain information specifying;
  - . The type (overpayment, underpayment, ineligible, denied, terminated, or suspended) and dollar amount of the error, if appropriate;
    - i. The applicable rule citation;
    - ii. A narrative explaining how the error was discovered;
    - iii. A listing of Federal reporting codes indicating: § Element and nature codes (program requirements);
      - § Type of error (agency or recipient responsibility);
      - § Discovery (how the error was identified);
      - § Verification (how the information supporting the error finding was verified:
      - e.g., from what source); and
      - § Occurrence (relationship between error and most recent action on case).

- 4.5. Processing Basic Food Error Cases (Federal Quality Control Reviews):
- 5. QA QC will inform CSD, or ALTSA/HCS, or DDA when a case error is identified. At this point, CSD or HCS will have the opportunity to review the error and provide comments to the QA manager; comments may be made prior to and at the Process Review Panel.
- 6. The FSS will not process the case error at this point and will not contact the household for information related to the error.
- 7. The FSS may have contact with the household related to ongoing eligibility, such as conducting an eligibility review.
- 8. All QA error cases are reviewed by the Basic Food Process Review Panel before the cases are finalized and reported to USDA/FNS.
- <u>9.6.</u>Once the error has been finalized, the <u>FSS-PBS</u> will take appropriate action on the case, including computing and establishing an overpayment or issuing an underpayment if necessary.
- 10.7. CSD, or DDA will initiate corrective action, including:
- . <u>a.</u>Error analysis
- b. Changing Changes to procedures where appropriate
- c. **Providing** Provide training
  - 10. In some cases, after completion of the error review process, ESA/CSD, ADSA/HCS, and QA may be in disagreement over the error findings. The Director of the Office of Quality Assurance will be responsible for issuing a final decision.