STATE OF IOWA DEPARTMENT OF

Health AND Human

SERVICES

Strengthening Eligibility Integrity in Iowa
DECEMBER 2022

BACKGROUND

The Department of Health and Human Services (HHS) is committed to continuous improvement activities to ensure good stewardship of taxpayer dollars by addressing inefficiencies and ensuring accurate eligibility determinations. There are four areas of programmatic interventions that bolster the Agency's efforts to strengthen integrity within the public assistance eligibility system. Collectively, these interventions support a high-quality eligibility process.

BUSINESS PROCESS REDESIGN

HHS elected to pursue this opportunity after reviewing options to address the agency's Supplemental Nutrition Assistance Program (SNAP) error rate, which was above the acceptable federal threshold for consecutive federal fiscal years. While the error rate is the initial focus of BPR, the scope of work also includes Medicaid, Family Investment Program (FIP), and Child Care Assistance (CCA) eligibility processes.

In November 2020, HHS released a request for proposal (RFP) to identify a vendor to support BPR activities. HHS is funding BPR activities through existing state and federal appropriations. Per the RFP, successful completion of BPR will result in:

- A decrease in the SNAP error rate (at or below 6.3%).
- Solutions to ensure ongoing success and maintenance of an acceptable error rate.
- Improved communication on every level, including between regions and within each specific division or office.
- Positive customer service feedback from applicants.
- Increased engagement from field staff.

Public Consulting Group (PCG) was awarded the contract and the work began in July 2021. PCG has met deliverable timelines. The initial phase of the work is intended to improve the accuracy and quality in the determination of eligibility for SNAP. Additional phases will enhance eligibility processes across economic assistance programs.

SNAP AND FIP ELIGIBILITY PROCEDURES

Currently, households must verify their earned and unearned income:

- at application
- at recertification
- when a new household member is reported
- when new income is reported
- when an income change is reported

FIP INCOME AND ELIGIBILITY VERIFICATION REQUIREMENTS

For FIP, federal regulations found at 45 CFR 205.51-205.60 cover income and eligibility verification requirements (IEVS). These regulations require a state to have a computer matching system that uses an applicant or recipient's Social Security Number to screen for income and assets when determining eligibility or benefit amounts. States conduct the requisite data exchanges with the federal Internal Revenue Services, state wage information collection agencies, unemployment benefits from Iowa Workforce Development, and the Social Security Administration. When a "hit" occurs that shows information that differs from the case record information, then the state must independently verify or follow-up on the information.

SNAP NATIONAL ACCURACY CLEARINGHOUSE (NAC)

The December 2018 Farm Bill directed states to join the National Accuracy Clearinghouse (NAC). FNS contracted with the federal General Services Administration (GSA) to begin building an electronic infrastructure to meet anticipated NAC guidelines. Iowa volunteered and was selected to be a first-round state to help build the infrastructure. Iowa has been working closely with FNS and GSA since Spring 2021, to create processes and help build the system infrastructure that will be rolled out to every state over the next few years. FNS notified states during the pandemic that this work would be pushed beyond the December 2021, statutory deadline due to data security risks. Recently, HHS received notice from FNS that they have resumed work on the system. HHS is engaged with FNS to complete this work.

SNAP CONTINUOUS CASE IMPROVEMENT UNIT

The Continuous Case Improvement Unit (CCIU) started reading 500 recently approved cases per week in November 2020. This immediate case read provides direct feedback right after a case has been processed and provides up-to-date data on any emerging error trends. These trends are identified, analyzed, and mitigated at the worker level.

SNAP PAYMENT ACCURACY TEAMS

Two new payment accuracy teams have been created. The SNAP Accuracy Sustainability Team will effectively monitor and manage Iowa's payment accuracy efforts through data collection, analytics, and reporting, as well as through concrete actions . The SNAP It Together Team, which is the second payment accuracy team, focuses on the error rates and payment accuracy efforts at the service area level . The team will work to identify any local trends and root causes, report that information to the state-level team, and then jointly identify necessary actions to make improvements.

ELIGIBILITY DATA SOURCES

Per federal regulations, HHS uses multiple data sources to ensure compliance, efficiency, and accuracy relating to the eligibility programs and actionable decisions. Matches through these data sources are intended to avoid duplication in benefits and ensure correct eligibility determinations, while ensuring clients receive the benefits they are entitled to receive.

Current data matching sources include:

- Social Security Administration
- Iowa Workforce Development
- PARIS - National duplicate benefit match database
- Payments made through the Child Support Recovery Unit
- Iowa Department of Public Health
- National Directory of New Hires (SNAP only)
- eDRS (SNAP only) - National database of disqualifications
- IRS (FIP only)

In addition to the data checks that workers complete, information is also automatically system-generated and issued to workers for:

- Social Security – alerts
- Wage – monthly and quarterly reports
- Unemployment Insurance Benefits – monthly reports

FRAUD INVESTIGATIONS

The Department of Inspections and Appeals (DIA) performs fraud investigations related to HHS eligibility programs. If fraud is suspected, an investigation is conducted, and results are reported back to HHS. At that point, HHS may request a SNAP household to be given an intentional program violation which carries a suspension penalty.

DATA MATCHING AND VERIFICATION TOOLS: EQUIFAX

HHS is working to implement a range of eligibility verification tools into our processes through a contract with Equifax. These tools will augment our work as additional data matching sources, enabling more accurate eligibility determinations. Integration and implementation will likely occur in a phased approach, expected for completion in late 2022. Key milestones will be updated accordingly.

IMPLEMENTATION TIMELINE & ACTION PLAN

#	Milestone	Target Completion Date	Completion Date	Implementation Update Description
1	Implement system infrastructure for the NAC	10/31/2022	Anticipated 02/2023	FNS extended the timeline for implementation to February 2023. Iowa is currently prepared for this deadline and no challenges are expected.
2	Implement Equifax data matching and verification tools	1/15/2023	Estimated January 2023	Implementation is expected to begin when pending contract and pricing agreements are signed. IT development and staff training are in process.
3	Implement strategies identified within year 1 of the BPR including enhanced interviewing techniques and a new onboarding process for Income Maintenance Workers	6/30/2023	August and September 2022	The first round of interviewing training was completed in August 2022. Pre- and post-training evaluations have been developed to assess the effectiveness of this training. The common onboarding model pilot began in September 2022. Evaluation strategies are in place to assess the effectiveness of the pilot and will guide recommendations for future adoption.

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