

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, CA 95814

September 21, 1993



ALL-COUNTY LETTER NO. 93-70

TO: ALL COUNTY WELFARE DIRECTORS

<u>Reason for this Transmittal</u>	
<input type="checkbox"/>	State Law Change
<input type="checkbox"/>	Federal Law or Regulation Change
<input type="checkbox"/>	Court Order or Settlement Agreement
<input type="checkbox"/>	Clarification Requested by One or More Counties
<input checked="" type="checkbox"/>	Initiated by CDSS

SUBJECT: FOOD STAMP CORRECTIVE ACTION PLAN

Attached for your information is a copy of California's Food Stamp Corrective Action Plan (CAP) which was sent to the Food and Nutrition Service (FNS) as required by federal regulations.

State Original Error Rate (SOER) findings of quality control (QC) payment errors for Federal Fiscal Year (FFY) 1992 (April through September 1992) are presented in this plan. The SOER for this period which includes issuances to ineligible, overissuances and underissuances was 10.7 percent. This is 1.9 percentage points higher than the previous review period of October 1991 through March 1992.

In Part I of this plan, we present an overview of state level error reduction activities. Part II discusses county error rate data for the 34 largest counties and an overview of county level error reduction efforts. This data shows that 24 of these 34 counties had error rates below the FFY 1991 federal tolerance level of 10.31 percent.

We appreciate the hard work and attention you have directed toward accuracy improvement in the Food Stamp program. We will make every effort to assist you in bringing Food Stamp error rates below sanctionable levels and maintaining them at a low level.

If you have any comments or questions about this Plan, please contact Mr. Ron Thoreson, Chief, Operations Improvement Bureau at (916) 445-2154.

MICHAEL C. GENEST
Deputy Director
Welfare Programs Division

Attachment

c: CWDA

FOOD STAMP PROGRAM
CORRECTIVE ACTION PLAN
APRIL 1992 - SEPTEMBER 1992

CALIFORNIA DEPARTMENT OF
SOCIAL SERVICES

MAY 1993

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INTRODUCTION

In accordance with Title 7, Code of Federal Regulations, Part 275.17, this document provides to the Food and Nutrition Service (FNS) California's Corrective Action Plan (CAP) for reducing errors in the Food Stamp program.

The CAP is in two parts. Part I consists of error rate data analysis of the federal quality control (QC) sample for the review period of April through September 1992. This part also provides an overview of current state level accuracy improvement activities.

Part II reports on county level corrective action. It consists of individual county error rate information based on results of the QC reviews conducted by counties for the review period of April through September 1992 and an overview of county level accuracy improvement efforts. This overview summarizes the broad range of activities occurring in the 34 QC counties; details of specific county error reduction activities can be found in the individual corrective action plans submitted semi-annually by the counties to the California Department of Social Services (CDSS).

PART I

STATE LEVEL ACCURACY IMPROVEMENT

1. ERROR RATE DATA ANALYSIS

For the April through September 1992 review period, California's Food Stamp cumulative payment error rate (CPER) which includes issuances to ineligible, overissuances, and underissuances was 10.7 percent (see Chart 2.) This CPER is 1.9 percentage points higher than the CPER for the previous review period of October 1991 through March 1992. The case error rate also showed an increase from 25.8 to 30.5 percent for the current period (see Chart 1.)

The increase in the CPER for the April through September 1992 review period was due almost entirely to an increase in the ineligible/overissuance component which increased 1.8 percentage points from 5.3 to 7.1 percent (see Chart 3). The underissuance component showed little change from the prior review period, increasing only slightly from 3.5 to 3.6 percent (see Chart 4.)

The error rate findings for the April through September 1992 review period are based on a sample size of 534 cases. The average monthly caseload subject to review during this period was 766,773 cases.

California's six-month CPER of 10.7 percent is 0.4 percentage points higher than the most current federal tolerance level of 10.3 percent based on national performance for Federal Fiscal Year (FFY) 1991.

For purposes of comparison, Chart 6 displays CPER error element concentrations for the current review period, and Chart 5 displays this information for the previous review period. For the current period, the leading cause of dollar errors was Wages and Salaries followed by Shelter Deduction. For the last three review periods, the leading error element has been Wage and Salaries followed by Shelter Deduction then Living Arrangement/ Household Composition. These three elements accounted for 53 percent of the current CPER, a decrease from 61 and 58 percent of the prior two periods.

Interestingly, the contribution of Wage and Salaries to the CPER decreased considerably from 27 percent to 20.2 percent. However, the second leading error element (Shelter Deduction) also dropped, from 22.2 percent to 18.7 percent, leaving Wage and Salaries as the leading error element at 20.2 percent.

We are pleased to see this drop in the Shelter Deduction element. At 18.7 percent of the CPER, this is its lowest contribution to the CPER in the last four review periods. We attribute this to a previously implemented statewide corrective action (S-45-QC) described in Section 4, Part I of this Plan, as well as various individual county corrective actions targeted at this error element. We are hopeful that a recently implemented policy change to simplify casework procedures in situations where clients have shelter changes but do not actually move, will positively impact this error category in future review periods.

Public Assistance/General Assistance was the fourth leading cause of errors in the current period, increasing from 5.4 to 11.4 percent of the CPER. Unemployment Compensation was the fifth leading element, increasing from 3.1 to 7.3 percent. The sixth and seventh leading elements were RSDI Benefits and Lump Sum Payment, respectively.

Chart 7 displays error element concentrations for the ineligible/overissuance component of the CPER. For this component, Wages and Salaries was again the leading cause of errors, accounting for 25.8 percent of this component. Chart 8 displays comparable information for the underissuance component. For underissuances, the top error element was, as last quarter, Shelter Deduction. This element accounted for 38.8 percent of the underissuance component, more than twice that of the second leading element, Living Arrangement/Household Composition which accounted for 18 percent of the underissuance component.

The top error elements for the current review period are displayed in Charts 9, 10 and 11 for the CPER, the ineligible/overissuance component, and the underissuance component, respectively.

Agency caused errors decreased from 65 to 61.3 percent for the current review period as shown in Chart 12. Chart 13 provides a breakdown of agency and client causes for both case and dollar errors for the current period. The largest cause of agency dollar errors was Failure to Take Action, accounting for 38.8 percent of all dollar errors, a decrease from 46.8 percent.

The majority of Failure to Take Action errors were on reported information (27.7 percent) compared to only 11.1 percent on either inconsistent information or impending changes. The Operations Improvement Bureau has been focusing on ways to reduce Agency Failure to Take Action errors as part of its management evaluations described in Corrective Action S-42-QC in Section 4, Part I of this Plan.

Chart 14 displays negative error rate information. The negative error rate for the April through September 1992 review period was 6.9 percent. This is a significant increase from the 2.8 percent negative error rate for the previous review period. However, California's overall negative error rate for FFY 1992 is 5.3 percent, a 1.3 percentage point decrease from the previous 6.6 percent for FFY 1991. We are pleased that California's negative error rate has continued this downward trend for the fourth consecutive FFY.

Effective January 1988, the Review and Evaluation Branch (now known as the Review and Integrity Branch) of the California Department of Social Services (CDSS) required analysts to attempt collateral contacts in all quality control (QC) sample cases with a food stamp denial or discontinuance not supported by case record documentation. These collateral contacts serve to validate some county negative actions which would previously have been cited as errors.

In addition, the integrated Review and Improvement Study (IRIS) has included a negative action component since 1984. Through case review, the IRIS identifies cases erroneously denied or discontinued due to an incorrect application of the regulations, or cases that do not have sufficient documentation to support the negative action. Based on the case review findings, the IRIS team conducts a system review to identify the main elements contributing to the erroneous or insufficiently documented negative actions. In recent years, IRIS team members have worked closely with county staff to alert them to and help them resolve the factors contributing to these deficiencies. In addition, the IRIS process includes a written follow-up procedure, the county Program Improvement Response (PIR), to ensure counties take action on the identified program deficiencies. An onsite evaluation of the county's PIB is also conducted during the subsequent IRIS review. We feel the QC collateral contact requirement and the IRIS review of negative actions have contributed to the downward trend in the negative error rate and plan to continue both of these activities.

CHART 3
FOOD STAMP
PAYMENT ERROR RATE TREND
ORIGINAL STATE FINDINGS
FOR INELIGIBLES AND OVERISSUANCES

PERCENT

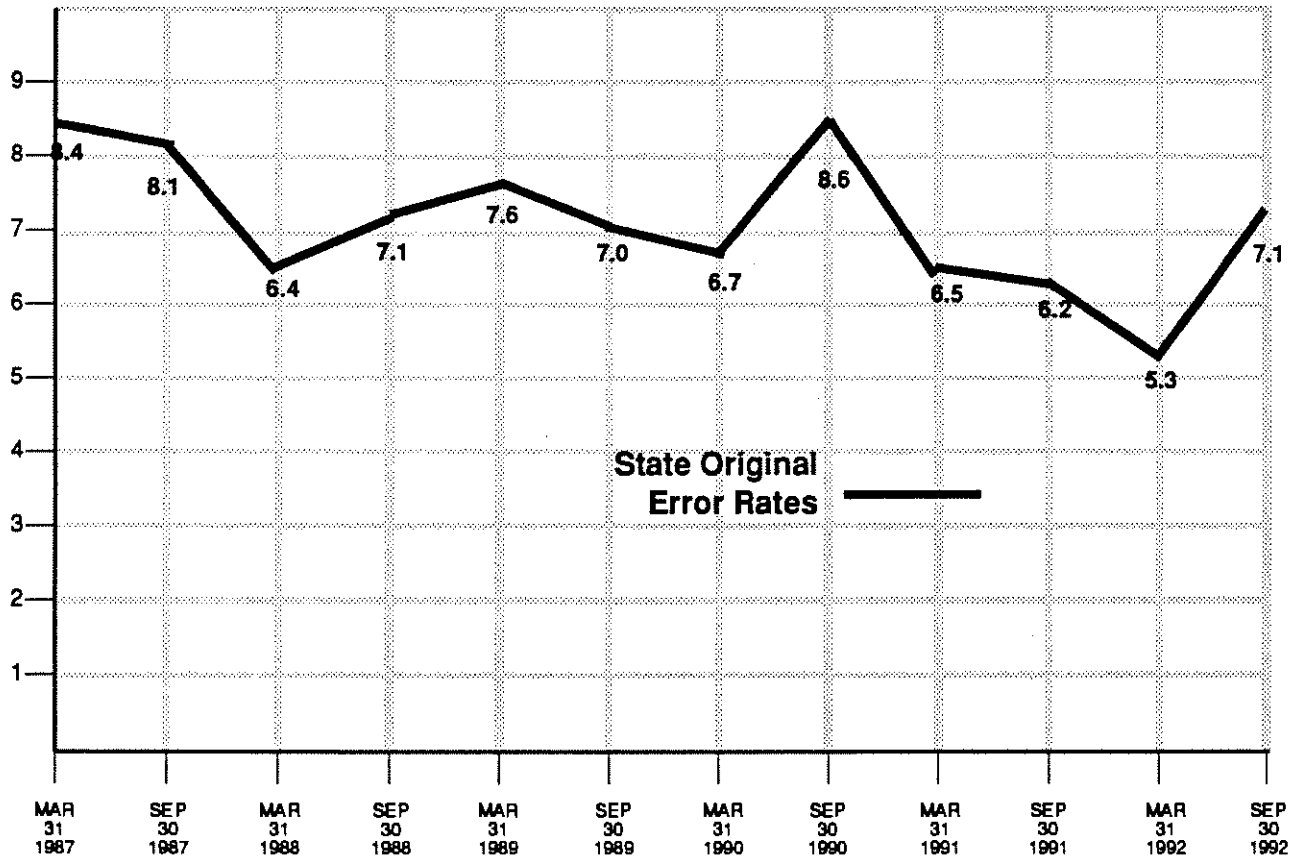


CHART 2
FOOD STAMP
PAYMENT ERROR RATE TREND
ORIGINAL STATE FINDINGS
FOR INELIGIBLES, OVERISSUANCES AND UNDERISSUANCES

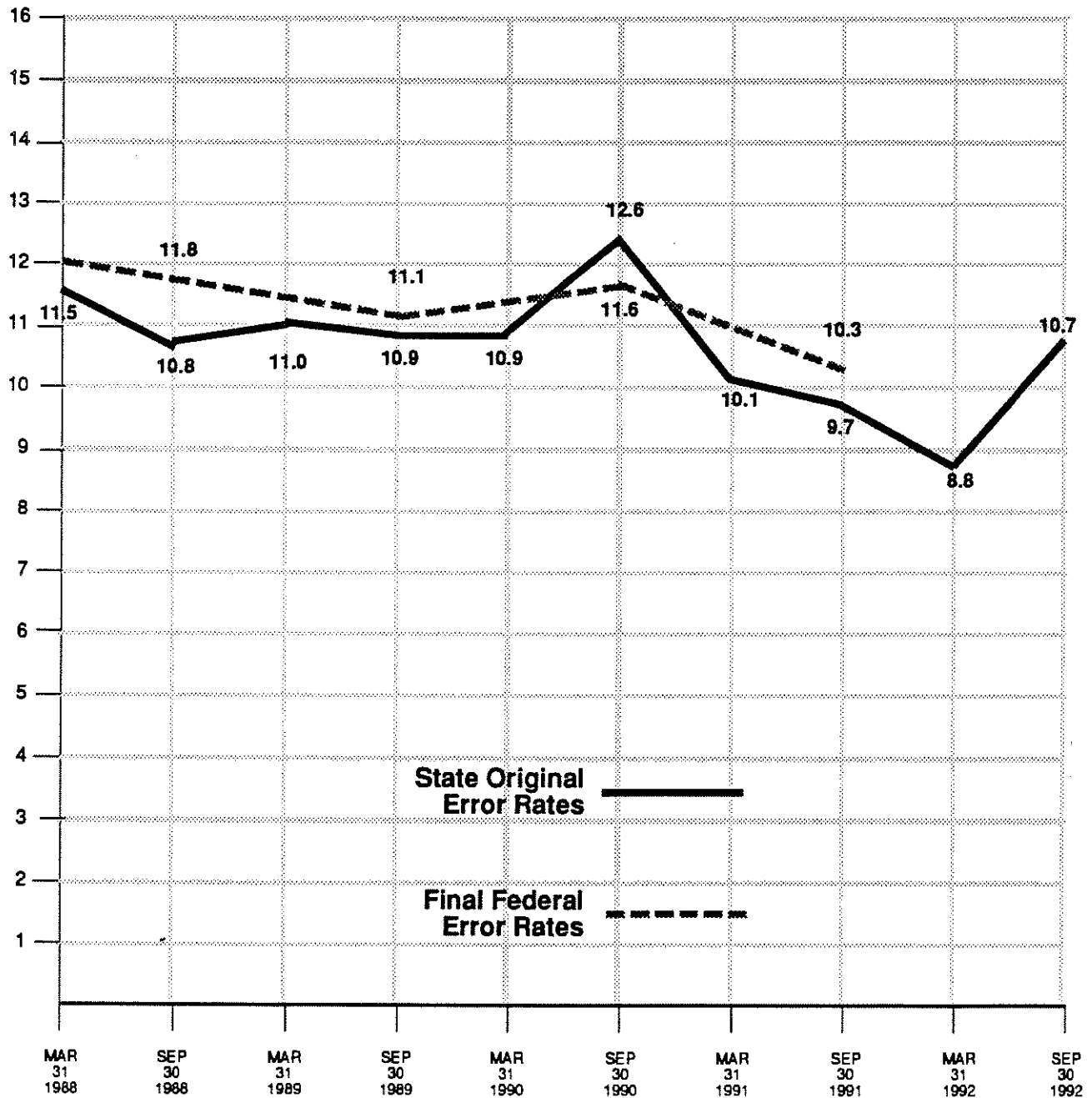


CHART 1

FOOD STAMP
PAYMENT AND CASE ERROR RATES
ORIGINAL STATE FINDINGS

Combined Ineligibles and Overissuances

<u>Period</u>	<u>Payment Error</u>	<u>Case Error</u>
April 1988 - September 1988	7.1	14.5
October 1988 - March 1989	7.6	14.5
April 1989 - September 1989	7.0	14.5
October 1989 - March 1990	6.7	14.8
April 1990 - September 1990	8.6	16.0
October 1990 - March 1991	6.5	14.3
April 1991 - September 1991	6.2	15.3
October 1991 - March 1992	5.3	12.8
April 1992 - September 1992	7.1	15.7

Combined Ineligibles, Overissuances
and Underissuances

<u>Period</u>	<u>Payment Error</u>	<u>Case Error</u>
April 1988 - September 1988	10.8	25.3
October 1988 - March 1989	11.0	25.9
April 1989 - September 1989	10.9	26.6
October 1989 - March 1990	10.9	28.2
April 1990 - September 1990	12.6	28.8
October 1990 - March 1991	10.1	26.5
April 1991 - September 1991	9.7	27.0
October 1991 - March 1992	8.8	25.8
April 1992 - September 1992	10.7	30.5

CHART 4
FOOD STAMP
PAYMENT ERROR RATE TREND
ORIGINAL STATE FINDINGS
FOR UNDERISSUANCES

PERCENT

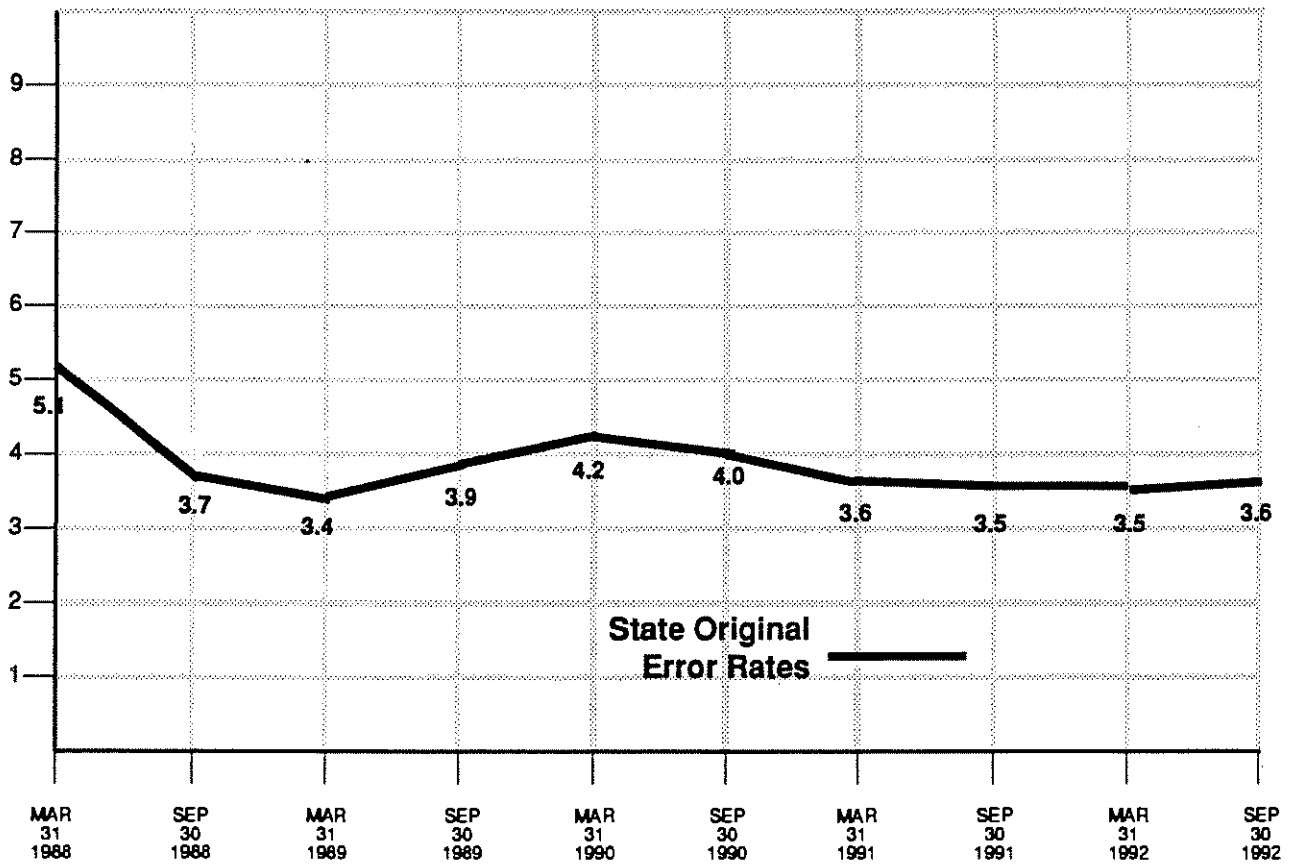


CHART 5

FOOD STAMP

ERROR CONCENTRATIONS
FOR OVERISSUANCES, INELIGIBLES, AND UNDERISSUANCES
October 1991 - March 1992

Error Element	Percent of Total Misspent Dollars*	Payment Error Rate*	Projected Annual Cost
1. Wages and Salaries (311)	27.08%	2.38%	\$26,751,590
2. Shelter Deduction (363)	22.27	1.96	21,999,283
3. Living Arrangement and Household Composition (150)	11.61	1.02	11,469,094
4. Citizenship and Alienage (130)	5.64	0.50	5,575,655
5. PA or GA Benefits (344)	5.45	0.48	5,387,874
6. Other Government Benefits (336)	4.52	0.40	4,463,413
7. Combined Gross Income (371)	3.67	0.32	3,625,621
8. Contributions/Income in Kind (342)	3.29	0.29	3,250,058
9. Veteran's Benefits (332)	3.14	0.28	3,105,611
10. Unemployment Compensation (334)	3.10	0.27	3,062,277
11. Standard Utility Allowance (364)	2.57	0.23	2,542,268
12. RSDI Benefits (331)	2.41	0.21	2,383,376
13. Arithmetic Computation (520)	2.38	0.21	2,354,487
14. Child or Dependent Care (323)	2.22	0.20	2,195,595
15. Educational Grants/Loans (345)	0.32	0.03	317,783
16. Earned Income Deductions (321)	0.18	0.02	173,336
17. Other Unearned Income (346)	0.12	0.01	115,560
	100.00%	8.80%	\$98,772,881

*Percents may not add to totals due to rounding.

Chart 6

FOOD STAMP

ERROR CONCENTRATIONS
FOR OVERISSUANCES, INELIGIBLES, AND UNDERISSUANCES
April 1992 - September 1992

Error Element	Percent of Total Misspent Dollars*	Payment Error Rate*	Projected Annual Cost
1. Wages and Salaries (311)	20.28%	2.17%	\$31,474,179
2. Shelter Deduction (363)	18.75	2.01	29,099,648
3. Living Arrangement and Household Composition (150)	13.33	1.43	20,687,910
4. PA or GA Benefits (344)	11.40	1.22	17,692,586
5. Unemployment Compensation (334)	7.32	0.78	11,360,503
6. RSDI Benefits (331)	5.45	0.58	8,458,298
7. Lump Sum Payment (212)	5.32	0.57	8,256,540
8. Standard Utility Allowance (364)	3.29	0.35	5,106,018
9. Real Property (221)	3.11	0.33	4,826,662
10. Combined Gross Income (371)	1.91	0.20	2,964,284
11. Contributions/Income In Kind (342)	1.78	0.19	2,762,527
12. Other Basic Program Requirements (000)	1.67	0.18	2,591,809
13. Child or Dependent Care (323)	1.39	0.15	2,157,254
14. Citizenship and Alienage (130)	1.38	0.15	2,141,734
15. Deemed Income (343)	1.16	0.12	1,800,298
16. Arithmetic Computation (520)	0.75	0.08	1,163,986
17. Educational Grants/Loans (345)	0.50	0.05	775,991
18. Self-employment Income (312)	0.46	0.05	713,911
19. Combined Net Income (372)	0.45	0.05	698,392
20. Monthly Reporting (560)	0.29	0.03	450,075
	100.00%	10.70%	\$155,198,122

*Percents may not add to totals due to rounding.

CHART 7

FOOD STAMP

ERROR CONCENTRATIONS
FOR OVERISSUANCES AND INELIGIBLES
April 1992 - September 1992

Error Element	Percent of Total Misspent Dollars*	Payment Error Rate*	Projected Annual Cost
1. Wages and Salaries (311)	25.88%	1.84%	\$26,647,477
2. PA or GA Benefits (344)	15.34	1.09	15,801,017
3. Living Arrangement and Household Composition (363)	10.90	0.77	11,225,864
4. Shelter Deduction (363)	8.56	0.61	8,815,539
5. RSDI Benefits (331)	8.21	0.58	8,458,454
6. Unemployment Compensation (334)	8.06	0.57	8,302,229
7. Lump Sum Payment (212)	8.02	0.57	8,257,594
8. Real Property (221)	4.68	0.33	4,820,649
9. Combined Gross Income (371)	2.88	0.20	2,968,270
10. Other Basic Program Requirements (000)	2.51	0.18	2,588,867
11. Standard Utility Allowance (364)	2.02	0.14	2,075,557
12. Contributions/Income In Kind (342)	1.26	0.09	1,294,434
13. Arithmetic Computation (520)	1.13	0.08	1,160,527
14. Child or Dependent Care (323)	0.54	0.04	556,062
	100.00%	7.10%	\$102,974,423

*Percents may not add to totals due to rounding.

CHART 8

FOOD STAMP

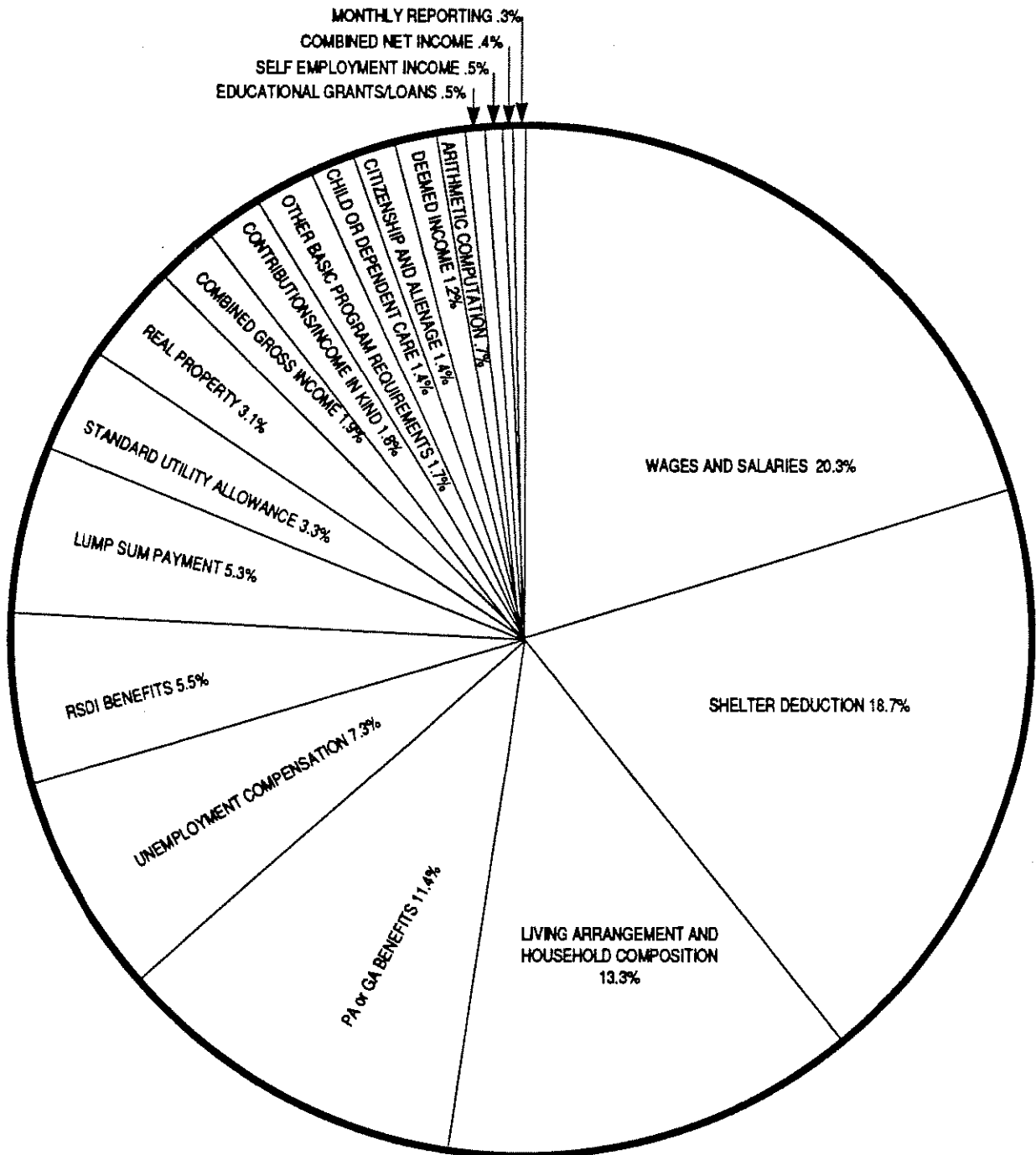
ERROR CONCENTRATIONS
FOR UNDERISSUANCES
April 1992 - September 1992

Error Element	Percent of Total Misspent Dollars*	Payment Error Rate*	Projected Annual Cost
1. Shelter Deduction (363)	38.85%	1.40%	\$20,286,898
2. Living Arrangement and Household Composition (150)	18.12	0.65	9,462,756
3. Wages and Salaries (311)	9.23	0.33	4,820,649
4. Unemployment Compensation (334)	5.85	0.21	3,057,541
5. Standard Utility Allowance (364)	5.81	0.21	3,035,224
6. Citizenship and Alienage (130)	4.10	0.15	2,142,511
7. PA or GA Benefits (344)	3.63	0.13	1,897,015
8. Deemed Income (343)	3.46	0.12	1,807,743
9. Child or Dependent Care (323)	3.08	0.11	1,606,883
10. Contributions/Income In Kind (342)	2.82	0.10	1,472,976
11. Educational Grants/Loans (345)	1.50	0.05	781,124
12. Self-Employment Income (312)	1.37	0.05	714,170
13. Combined Net Income (372)	1.32	0.05	691,852
14. Monthly Reporting (560)	0.85	0.03	446,356
	100.00%	3.60%	\$52,223,699

*Percents may not add to totals due to rounding.

CHART 9

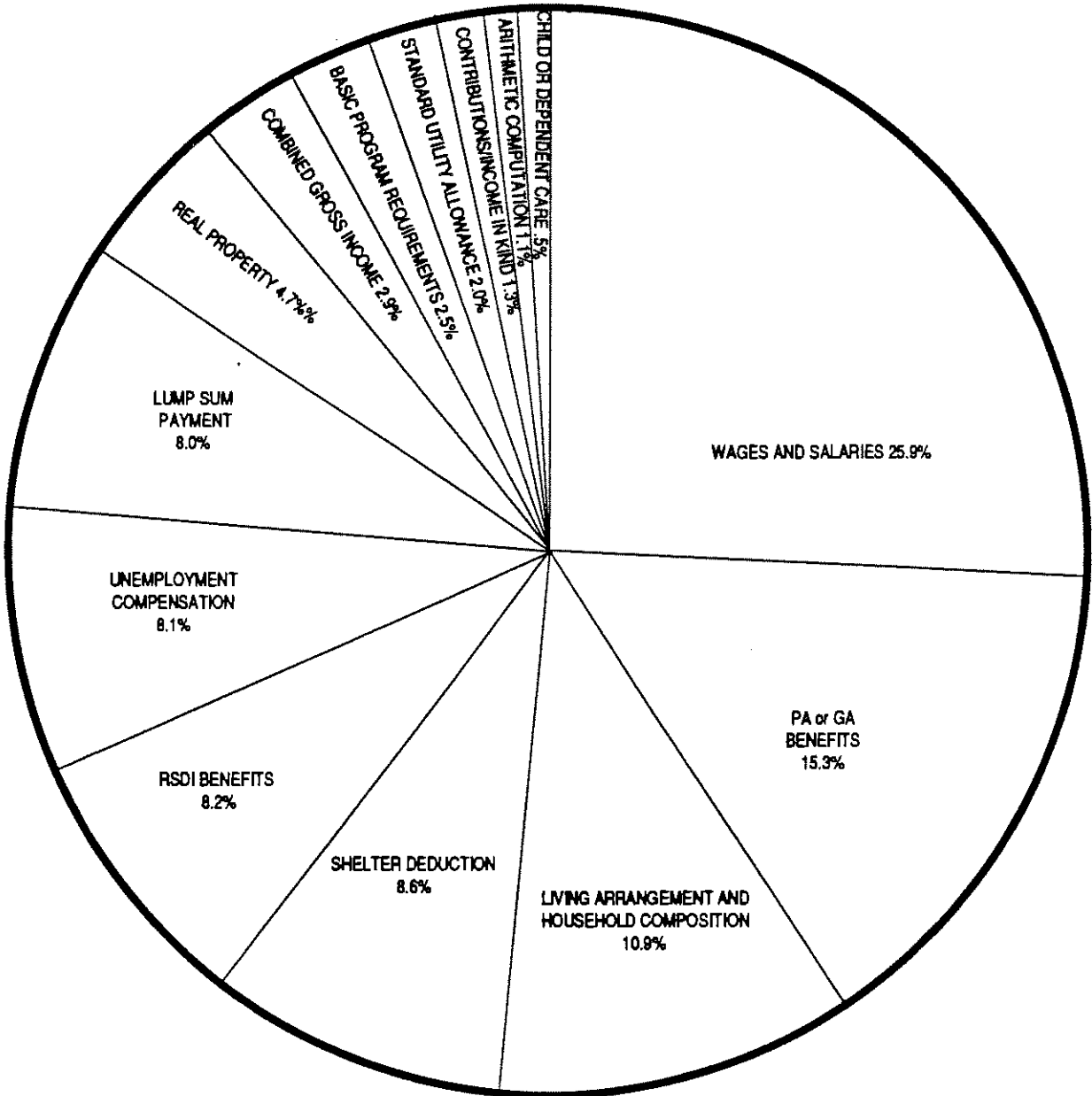
FOOD STAMP
PERCENT OF DOLLARS IN ERROR
FOR INELIGIBLES, OVERISSUANCES AND UNDERISSUANCES*
APRIL 1992 - SEPTEMBER 1992



* Percents may not add to 100 percent due to rounding.

CHART 10

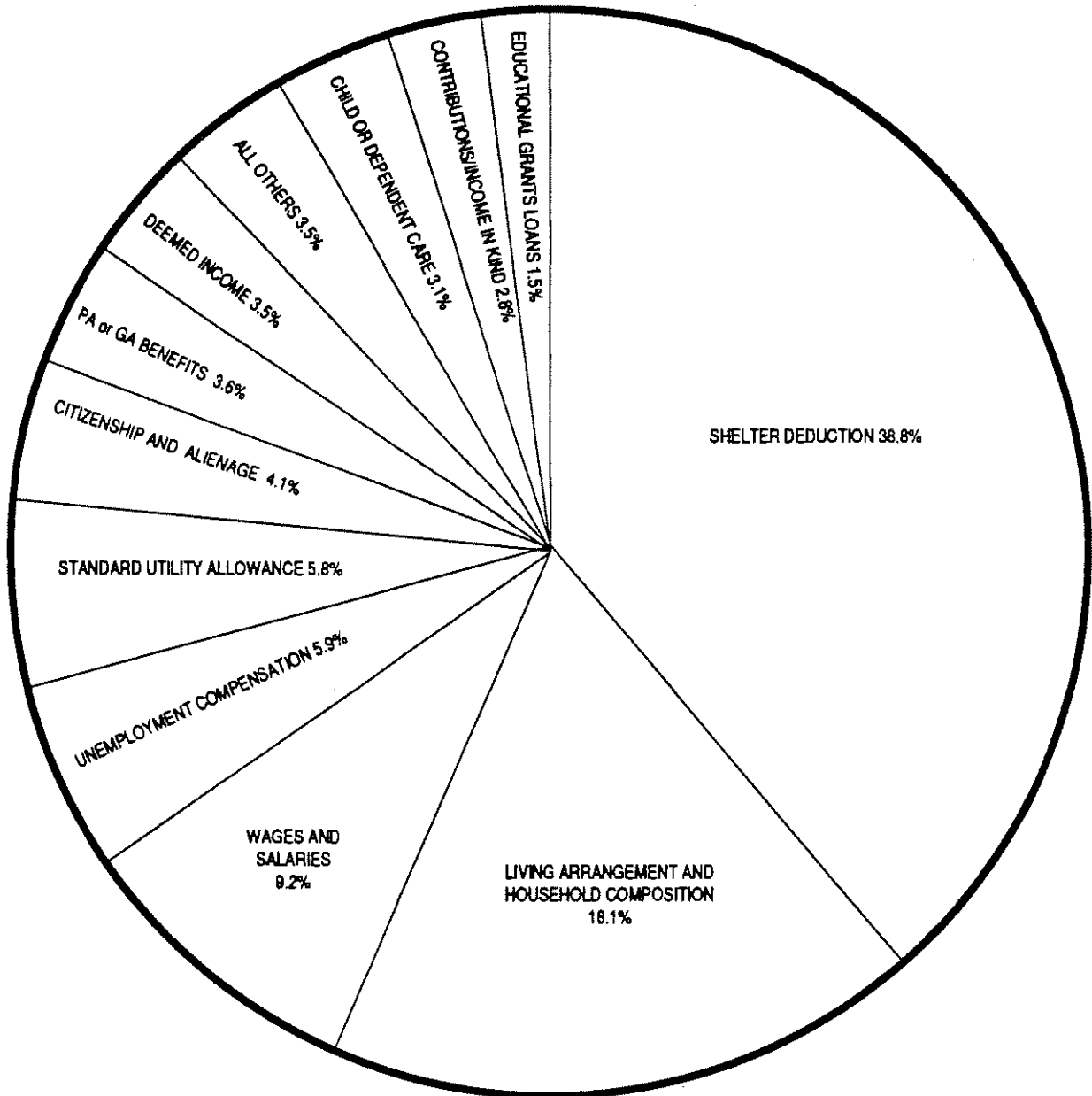
**FOOD STAMP
PERCENT OF DOLLARS IN ERROR
FOR INELIGIBLES AND OVERISSUANCES*
APRIL 1992 - SEPTEMBER 1992**



* Percents may not add to 100 percent due to rounding.

CHART 11

**FOOD STAMP
PERCENT OF DOLLARS IN ERROR
FOR UNDERISSUANCES*
APRIL 1992 - SEPTEMBER 1992**



* Percents may not add to 100 percent due to rounding.

CHART 12

**FOOD STAMP CASE AND DOLLAR ERRORS
AGENCY/CLIENT DISTRIBUTIONS**

PERIOD: OCTOBER 1991 - MARCH 1992:

	<u>CASE ERRORS</u>	<u>DOLLAR ERRORS</u>
Ineligibles, Overissuances and Underissuances Combined	Agency: 72.3% Client: 27.7 Total: 100.0	65.0% 35.0 100.0
Ineligibles and Overissuances Combined	Agency: 58.8 Client: 41.2 Total: 100.0	51.3 48.7 100.0
Underissuances	Agency: 85.5% Client: 14.5 Total: 100.0%	85.9% 14.1 100.0%

PERIOD: APRIL 1992 - SEPTEMBER 1992:

	<u>CASE ERRORS</u>	<u>DOLLAR ERRORS</u>
Ineligibles, Overissuances and Underissuances Combined	Agency: 71.2% Client: 28.8 Total: 100.0	61.3% 38.7 100.0
Ineligibles and Overissuances Combined	Agency: 63.2 Client: 36.8 Total: 100.0	49.6 50.4 100.0
For Underissuances	Agency: 79.7 Client: 20.3 Total: 100.0%	84.3 15.7 100.0%

CHART 13

FOOD STAMP CASE AND DOLLAR ERRORS
 AGENCY/CLIENT CAUSE DISTRIBUTIONS
 April 1992 - September 1992

FOR INELIGIBLES, OVERISSUANCES
 AND UNDERISSUANCES

	<u>CASE ERRORS</u>	<u>DOLLAR ERRORS</u>
<u>Agency Errors:</u>		
Failure to Take Action.....	42.4%	38.8%
Policy Incorrectly Applied.....	25.0	19.0
Arithmetic Computation.....	3.0	3.3
Other Agency Errors.....	0.8	0.2
Total.....	71.2	61.3
<u>Client Errors:</u>		
Information Not Reported.....	22.7	31.2
Reported Information is Not Correct.....	6.1	7.5
Total.....	28.8%	38.7%

FOR INELIGIBLES AND OVERISSUANCES

	<u>CASE ERRORS</u>	<u>DOLLAR ERRORS</u>
<u>Agency Errors:</u>		
Failure to Take Action.....	27.9%	24.0
Policy Incorrectly Applied.....	30.9	20.8
Arithmetic Computation.....	4.4	4.8
Other Agency Errors.....	0.0	0.0
Total.....	63.2	49.6
<u>Client Errors:</u>		
Information Not Reported.....	29.4	42.0
Reported Information is Not Correct.....	7.4	8.4
Total.....	36.8%	50.4%

FOR UNDERISSUANCES

	<u>CASE ERRORS</u>	<u>DOLLAR ERRORS</u>
<u>Agency Errors:</u>		
Failure to Take Action.....	57.7%	68.0%
Policy Incorrectly Applied.....	18.8	15.3
Arithmetic Computation.....	1.6	.4
Other Agency Errors.....	1.6	.6
Total.....	79.7	84.3
<u>Client Errors:</u>		
Information Not Reported.....	15.6	9.9
Reported Information is Not Correct.....	4.7	5.8
Total.....	20.3%	15.7%

CHART 14

FOOD STAMP
NEGATIVE ERROR RATE
ORIGINAL STATE FINDINGS

<u>Period*</u>	<u>Error Rate</u>
October 1983 - September 1984	2.54%
October 1984 - September 1985	4.43
October 1985 - September 1986	5.96
October 1986 - September 1987	9.30
October 1987 - September 1988	12.57
October 1989 - September 1990	8.30
October 1990 - September 1991	6.60
October 1991 - September 1992	5.30

*Federal Fiscal Year (FFY) data are presented for all review periods. There is no negative error rate for FFY 1989. The negative error rate sample was discontinued during that year because California, represented by San Diego County, participated in a nationwide study of Food Stamp negative actions.

2. OVERVIEW OF STATE ACCURACY IMPROVEMENT ACTIVITIES

California's Food Stamp program is administered by the counties under the supervision of the California Department of Social Services (CDSS). Because the delivery of services takes place at the county level, the CDSS takes a different approach to accuracy improvement than would be appropriate for states that are directly responsible for program administration.

Staff of the Operations Improvement Bureau (OIB) work to support, motivate, and monitor county level error reduction activities recognizing that the most effective efforts usually take place at the level of service delivery. State staff are involved in a variety of county level accuracy improvement activities as well as the development and implementation of state level corrective actions. This approach was adopted after reviewing Food Stamp program operations in California and determining it to be the most efficient method of mobilizing both state and county resources for effective error reduction.

In this section, we provide an overview of some of the ongoing accuracy improvement activities occurring at the state level.

- o Income and Eligibility Verification System (IEVS). This system provides the counties with a broad range of automated verification systems. The information is used to verify eligibility for both applicants and recipients and/or identify potential fraud. Computer matches verify unemployment insurance data, disability insurance data, wage information from within California and throughout the nation, Social Security benefits, unearned income from bank accounts or other investments, and duplicate aid.

This system represents an enhancement of three computer match systems that were already in place: the Integrated Earnings Clearance/Fraud Detection System which identifies unreported wages and duplicate aid for AFDC, Food Stamp and SSI/SSP recipients; the Payment Verification System which provides information on recipients who receive or will receive Retirement Survivors Disability Insurance, Unemployment Insurance or Disability Insurance; and the Asset Match System which matches the welfare recipient file against the State Franchise Tax Board's interest and dividend file.

In 1990, the information available to counties in the area of wage and asset matching was expanded to include nationwide wages and investment income. Nationwide wage data is sent to counties monthly from the Beneficiary Earnings Exchange Record (BEER). Information from the Internal Revenue Service (IRS) asset matches, including information on out-of-state investments, are provided to counties annually.

In December 1991, the applicant system added the Wire-to-Wire Third Party Verification system which provides social security number validation and Title II and XVI benefit information via computer link between California and Baltimore.

In addition to the above matches, the CDSS has added the Systematic Alien Verification for Entitlement (SAVE) and the Homeless Assistance Program Indicator (HAPI) systems. SAVE verifies the immigration status of all aliens who apply for and/or are recipients of AFDC and Food Stamps. HAPI creates a data base of individuals who have received Homeless Assistance to prevent duplicate or improper payments.

Currently, the CDSS is pilot testing the USDA Food Stamp Disqualification system and a statewide property match system known as DATAQUICK. The disqualification information will be available through IEVS and the property match will be available on a case-by-case basis when testing has been completed.

The Fraud Bureau also conducts periodic reviews of IEVS operations in counties to discuss IEVS related issues. Quarterly meetings are held with county IEVS Coordinators. At these IEVS "user" meetings, forthcoming changes to IEVS are discussed and IEVS problems are identified. Counties provide a valuable source of input to improve the IEVS system.

- o Fraud Early Detection Program. California has long had a formal pre-eligibility fraud detection program, entitled Fraud Early Detection (FRED). The FRED Program provides for investigative personnel to be placed in direct physical access to intake units in order to provide expeditious investigative service to those units. The program is separate and parallel to the intake function and does not interfere with normal intake procedures or delay the payment of benefits.

Prior to 1991, slightly less than half of California's counties participated in this program. In July of 1991, legislation passed that provides for 100 percent state funding, i.e., no county costs for counties that elect to participate. The legislation requires the counties to submit an operating plan for CDSS approval prior to the release of 100 percent funding. To date, 50 counties have opted to participate. Two more are in the process of developing operating plans. These 50 counties represent over 95 percent of California's welfare caseload.

During the period of October 1990 through September 1991 (prior to implementation of the 100 percent program), over 50,000 Food Stamp (NA and PA) applications were referred to the program; of these, approximately 24,000 were denied, reduced or withdrawn. As the average (NA and PA) Food Stamp case receives \$100.00 per month for 15 months, it is estimated that almost \$36 million in erroneous Food Stamp benefits were prevented as a result of this program. Since implementation of the 100 percent program, denials and reductions in benefits have exceeded 40,000 a year. This results in an increased estimated annual savings of \$60 million by preventing the erroneous issuance of Food Stamp benefits.

- o Review and Evaluation Bureau. The Review and Evaluation Bureau's (REB) goal is to reduce quality control caused errors in the sample by more accurately identifying true errors in the Food Stamp Federal Sample and creating a more accurate Management Information System (MIS). REB is moving toward full automation of the Quality Control (QC) system to replace the manual processes.

The steps REB is taking toward full automation are:

- o Automated sample selection
- o Automated integration
- o Automated data base inquiries
- o Automated ordering of third party collateral information
- o Streamlining the worksheet for Integrated AFDC and Food Stamps QC Review Facesheet (QC 1), including preprinted statements in certain elements
- o Automating the QC 1, which will replace the hard copy worksheet and schedule with a data file
- o Ability to download Napa County's case file information to the data file, also known as the automated QC 1
- o Ability to complete the Integrated Review Schedule by migration of data from the QC 1

Eventually, REB will have a complete statewide central database, wherein REB will have direct on-line access to all county case file information and statewide sample and integration capability. REB's automation efforts allow the CDSS to gather relevant information from the client population to address emerging issues and possible need for change in the Food Stamp program.

The Bureau is also implementing more efficient procedures to better identify Food Stamp errors. REB has continued its progress toward full automation in an effort to gather Food Stamp data that will accurately measure state and county performance in the administration of Food Stamp benefits. Since 1981, REB has continued its efforts to efficiently provide evaluation data to program managers administering the program, in an effort to maintain error rates bellow the established tolerance level.

REB's Policy and Administrative Support Unit has recently implemented a change to the Federal Difference Process. This incorporates cooperation and communication with departmental legal and program units to better understand issues such as court cases and federal/state exception issues. The intent is to avoid federal difference findings by timely incorporation of legal or policy changes into state QC review processes.

REB and the San Diego County Department of Social Services are currently enjoined in a project called the San Diego County Quality Control/Fraud Project. The objectives of this project are to:

- o Identify a valid county error rate. A sample of cases will be selected and reviewed using federal review standards and methods.
- o Test experimental QC verification techniques. Expand in number and, in some cases, the scope of federal review standards and methodology for possible adoption by state QC.
- o Produce an improved QC/fraud MIS for corrective action purposes and add to available MIS data and displays.
- o Assess the value of joint state and county QC efforts. Determine possible restructuring in the state/county QC review relationship.
- o Evaluate the working relationship and level of cooperation between state/county QC operations and county program, corrective action, and fraud functions.

REB is currently working with a contractor to develop software for QC 1 automation. The software will include prompts for the analyst that will produce a help screen with QC documentation standards. The automated QC 1 will enable analysts to produce more consistent, accurate documentation in a shorter timeframe. This software is expected to be operational on July 1, 1993.

REB is creating a comprehensive Analyst Training Package covering all aspects of the QC analyst's job function for new staff and for seasoned staff as a refresher. The Training Team is initially focusing on the development of the QC 1 elements. A brief overview will be created with an introduction to, and an overview of each module. The Integrated Standards Handbook will be revised to complement the Analyst Training Package. This comprehensive Analyst Training Package will benefit the QC process by reaffirming policies and procedures, which in turn will result in more complete and uniform reviews.

- o The Accuracy Improvement Bureau Clearinghouse. The OIB encourages counties to share information and ideas. A Clearinghouse of corrective action products and resources has been operational since 1987. The contents of the Clearinghouse represent the efforts of counties and other entities to design products that emphasize error prevention and corrective action. These products have been effective tools for the counties that designed them and may be of benefit to other counties as well. Some products have also been developed in regional corrective action workshops attended by county, state, and federal staff. In addition, the Clearinghouse serves as a vehicle for the distribution of products developed as a result of state level corrective action.

Products in the Clearinghouse are continually updated. They are classified under the following headings: AFDC Eligibility, CA-7 Processing, Case Review/Supervisory Review, Caseload Management, Choosing the Right Corrective Action, Client Caused Errors, Corrective Action Committees, Evaluation, Error-Prone Profiles/Identifying High Risk Factors, Food Stamp Eligibility, Fraud Prevention, Problem Solving, Time Management, Training, and Worker Performance Standards/Employee Expectations.

Clearinghouse products are available to counties upon request. Bureau consultants are familiar with these products and recommend appropriate products to counties.

- o Annual Statewide Accuracy Improvement Conference. From 1986 through 1990, an annual statewide conference was jointly sponsored by federal, state and county government organizations to give welfare professionals throughout the state the opportunity to meet each other and discuss corrective action issues. Due to severe state budget constraints and the possibility of impending state layoffs in 1991, CDSS opted to cancel the annual conference. However, Accuracy Improvement Consultants continue to assist counties in preparing and presenting regional accuracy improvement conferences.
- o Regional Eligibility Worker and Eligibility Supervisor Conferences. OIB staff work jointly with county staff to develop and present eligibility worker and eligibility supervisor conferences. The first regional eligibility worker conference took place in July 1988. Since that time, numerous eligibility worker and supervisor conferences have taken place at various locations throughout the State. Currently, five regional conferences occur each year. The Bay Area, Northern/Motherlode Counties, and Southern Counties regional corrective action committees each sponsor an annual eligibility worker conference. The Valley Nine Network and Southern Counties regional corrective action committees each sponsor an annual supervisor conference.

In addition, the Valley Nine Network holds eligibility worker field days with rotating host counties three times a year. The primary objectives for these conferences and field days are to raise participant awareness of corrective action issues and to enhance networking among welfare professionals. All have been very successful.

- o Problem Solving Training. To assist counties in developing the necessary problem solving skills for effective error reduction, the OIB makes several types of training sessions available to counties.

One of these is the "Nine-Step Problem Solving Workshop." This is a full day workshop designed to teach problem solving skills to supervisors, lead eligibility workers, managers and other staff directly involved in corrective action planning. Participants work in small groups to analyze problems, identify causes, and develop solutions including implementation and evaluation plans.

The OIB also presents a half-day workshop especially for county line staff. This workshop, "Quality Control/Accuracy Improvement Awareness Training," provides eligibility workers and supervisors with information about the QC process in their county and about skills they can use to solve problems at the unit, district office or departmental level. This training focuses on helping line staff realize that they can make a difference in lowering California's error rate.

Production of these and other training sessions is a cooperative effort by both state and county staff. Participants in these workshops not only enhance their problem solving skills, they also enjoy the opportunity to network and share ideas with other welfare professionals.

3. PLANNED CORRECTIVE ACTIONS

This part of the Plan presents a description of new state level corrective action projects. The planned corrective actions are developed after analyzing state and county quality control review data, county corrective action plans, and other information such as Integrated Review and Improvement Study (IRIS) reports. New planned corrective action are listed below:

S-47-QC Corrective Action Follow-up on IRIS-Identified Issues

S-48-QC The Good Neighbor Project

Number

S-47-QC

Title

Corrective Action Follow-Up on IRIS-Identified Issues

Description

Prior to October 1990, counties expressed growing confusion and frustration with the disjointed process that had evolved for reporting corrective action on Integrated Review and Improvement Study (IRIS) findings. Basically, counties had eight different organizations in the Department to communicate with and eight distinct processes in place. In response to this concern and the increasing instance of repeat findings, the Operations Improvement Bureau (OIB) volunteered to be responsible for corrective action follow-up with counties on IRIS issues beginning with the FFY 1990 reviews.

Effective with the FFY 1991 IRIS reviews, OIB implemented a formal process and a special form called a Program Improvement Response (PIR) for counties to use in documenting IRIS corrective action. PIRS are due 60 days from the date of the IRIS report. OIB reviews PIRS for appropriateness and monitors for closure. Monitoring involves phone discussions, procedures review and on-site county visits, based on the severity of the problems identified and the availability of OIB resources. In addition, all open PIRS are routinely monitored at every subsequent IRIS.

Effective with the FFY 1993 reviews, the PIR process was modified. OIB now enters the specific deficiency and recommended solution on each PIR form before releasing them to the county. The county receives a package of PIR forms that simply require completion of the last section, i.e., the corrective action. This change should reduce county delays in the dissemination of the PIR forms to their appropriate units for completion and allow counties more of the 60 day timeframe to plan and implement successful corrective action.

The October 1992 enhancement to the PIR process is expected to improve county submittal of completed PIRS within the allotted 60 days. As noted, the PIR process was developed to ensure corrective action was taken on IRIS findings. Having this process should reduce the number of findings which we see repeated from review to review.

Implementation Plan

<u>Item</u>	<u>Responsibility</u>	<u>Milestone</u>
Implement PIR process	OIB	Completed October 1991
Initiate enhancements to PIR process	OIB	Completed October 1991
Determine if there has been an improvement in counties submitting PIRS within required 60 days	OIB	-November 1993
Determine if there has been a decrease in the occurrence of repeat IRIS findings	OIB	-November 1993

Expected Benefits

1. The October 1992 enhancement to the PIR process is expected to improve county submittal of completed PIRS within the allotted 60 days.
2. As noted, the PIR process was developed to ensure corrective action was taken on IRIS findings. Having this process should reduce the number of findings which we see repeated from review to review.

Anticipated Costs

We expect no additional costs beyond normal departmental staffing and salaries.

Evaluation

This corrective action will be evaluated to determine if there has been a decrease in the occurrence of repeat IRIS findings in individual county reviews.

Number

S-48-QC

Title

The Good Neighbor Project

Description

In January 1993, the Accuracy Improvement (AIM) Unit of the Operations Improvement Bureau (OIB) initiated a project involving Fresno and Tulare Counties for the purpose of improving their Food Stamp error rates. These counties have been experiencing higher than normal Food Stamp error rates for several review periods.

AIM's review of the corrective action plans submitted by these two neighboring counties revealed that they were experiencing similar error problems and trends. AIM also felt that each of these counties had valuable corrective action strategies to share with each other.

The counties named this effort The Good Neighbor Project. Its goal is to improve the corrective action processes and quality control error rates in Fresno and Tulare Counties through information sharing, mutual support and task development. The project committee consists of the corrective action liaison from each of the counties (who are also the quality control managers of their county), AIM staff, and a Food Program Specialist from FNS Western Region Office.

The committee decided as its first task, it would review and share the counties' error problems and previously implemented corrective actions. It was also decided that the counties would share effective quality control or error reduction strategies not currently being used by, but of interest to, the other county.

Because of mutual problems surrounding seasonal farmworker cases and numerous errors resulting from these cases, the counties decided to compile their policy questions concerning seasonal farmworker cases and transmit them to policy staff of the CDSS Food Stamp Program Branch who were contacted and agreed to respond to the transmittal.

As a major task of this project, AIM staff agreed at the request of Tulare County to conduct six sessions of the "Quality Control/Accuracy Improvement Awareness Workshop." This workshop gives workers the opportunity to learn more about quality control and accuracy improvement, the importance of error rates, and to develop a corrective action on the problem of agency failure to act.

To date, the project committee has completed several of its established tasks. AIM staff shared a history of the counties' error rates and trends and an overview of their previous corrective actions. The counties then provided more in-depth explanations of individual corrective actions that were of interest to the other county.

Each county also described a major strength or strategy characterizing its approach to error reduction. For Fresno, a major strategy is the promotion of accountability from eligibility workers to program managers and the aggressive development and implementation of pertinent training and technical products. For Tulare, a major strength is the use of a personal computer program to maintain quality control error data for the department and each of its five district offices. This cumulative data program is invaluable to the county's STOP committee (a corrective action committee) for determining the source of errors and deciding what errors to tackle.

The counties' questions about seasonal farmworker were compiled and transmitted to the Food Stamp Program Branch. The Quality Control/Accuracy Improvement Awareness Workshop was conducted in Tulare County for approximately 150 line workers in April 1993.

Implementation Plan

<u>Item</u>	<u>Responsibility</u>	<u>Milestone</u>
Establish project committee	Accuracy Improvement Unit	Completed January 1993
Establish project goals	Project Committee	Completed January 1993
Analyze Tulare and Fresno Counties' error rates and trends	Accuracy Improvement Unit	Completed January 1993
Analyze findings and develop committee tasks	Project Committee	Completed February 1993
Share effective error reduction strategies and procedures	Fresno, Tulare Counties	Completed February 1993

Compile and transmit policy questions	Project Committee	Completed April 1993
Conduct QC/AIM Awareness Workshop in Tulare County	Accuracy Improvement Unit	Completed April 1993
Evaluate corrective actions in Tulare and Fresno Counties	Accuracy Improvement Unit	-November 1993

Expected Benefits

This corrective action is designed to facilitate the sharing and development of corrective action procedures between two neighboring counties experiencing high Food Stamp error rates. It is anticipated that these counties will adopt some of the effective practices being used by the other.

Anticipated Costs

We expect no additional costs beyond normal departmental staffing and salaries.

Evaluation

This corrective action will be evaluated based on its success in promoting effective accuracy improvement strategies in Fresno and Tulare Counties.

4. STATUS OF PRIOR CORRECTIVE ACTIONS

This part of the Plan presents information on the progress of previously implemented corrective actions. They are:

- S-42-QC Review of Action on Reported Changes
- S-44-QC QC Error Case Correction Project
- S-45-QC Products For Shelter Deduction Error
- S-46-QC Seven County Partnership Effort

Number

S-42-QC

Title

Review of Action on Reported Changes

Description

The Continuing module, which has been a regular part of the Integrated Review and Improvement Study (IRIS), was expanded effective FFY 1990 to include a review of systems which are key in preventing errors which occur when workers fail to act on reported changes. Initially, the three systems which were examined included: 1) the CA-7 process, 2) supervisory reviews, and 3) procedures for handling uncovered caseloads. Based on preliminary data, effective with FFY 1991, the uncovered caseload system review was replaced with a review of eligibility worker training. In addition, as failure to act on reported changes was a major source of statewide errors, the Seven-County project also reviewed how the large counties have tackled this problem (see S-46-QC for details of this project).

The statewide failure to take action, agency caused error rates for the last three periods are:

April 1991 - September 1991	44.4
October 1991 - March 1992	46.8
April 1992 - September 1992	42.2

These figures indicate a 4.6 percent statewide decrease for the current report period. However, the specific county error rates for those counties which conduct the State Sample indicate otherwise. Of the nine counties in which an IRIS was conducted since the last federal report cycle, four of the nine have county specific error rates (i.e., conduct the State Sample). Of the four counties, the overall error rates have increased in three. However, counties do not currently report the numbers/dollars associated with failure to act errors. Because this type of information would provide a more accurate picture of the affects of this CAP on this trend, we are revising our evaluation methodology.

Counties will be asked to track and report this information in their six month CAP reports beginning with those due in November 1993. We believe this method of evaluation will result in more conclusive data from which to assess our efforts in this area.

As noted in our prior report, given the magnitude and persistent nature of this category of error, this module has become a regular part of all the IRIS reviews. We plan to assess the results and report on this area routinely.

Implementation Status

Evaluate module effectiveness/
make improvements

- Completed October 1990

Issue summary report

- Completed May 1991

Evaluate corrective action
for impact on errors

- November 1993 and
ongoing every six months

Number

S-44-QC

Title

QC Error Case Correction Project

Description

Integrated Review and Improvement Studies (IRIS) conducted in FFY 1989 revealed that many counties were not correcting error cases identified in Federal Sample QC reviews. This is a serious concern. Correction of error cases is an important component of casework accuracy and an essential step to prevent additional error citations should the case be selected again for QC review.

To assist counties in developing and implementing an effective case correction procedure, the Welfare Program Integrity Branch conducted a review of county welfare departments' practices in the correction of individual case errors. The purpose of this review was to discover the constraints which may be impeding the correction of individual case errors and to identify effective procedures and monitoring systems. A report summarizing the findings and highlighting successful county practices was sent to all counties in May 1991. Through county inquiries and other contacts with the counties, we believe that some counties have utilized the information that was generated to establish their own improved systems for case correction.

As noted in our prior report regarding this CAP, the IRIS teams have continued to check on the correction of QC Federal Sample errors in each county reviewed to document the county procedures in place for correcting these errors and to make recommendations for improvements.

Based on the IRIS reviews, the rate of correction for the 12 counties reviewed in the prior 6 month period was 76 percent. This period, the number of counties reviewed was 9 and the rate decreased to 54 percent.

As a result of this data, the Operations Improvement Bureau which conducts the IRIS reviews, will be implementing two changes to this action. First, counties will be held to submitting documentation of a claim or a restoration form, in addition to the systems/process improvements as is now the practice before their correction action will be deemed acceptable. (See CAP #S-47-QC)

Second, the Accuracy Improvement Unit will work in tandem with the IRIS teams on this problem. The consultants will include as part of their county visits, a validation of case correction.

One of the benefits of having the AIM Unit assist with this action is that case correction can be checked on much more timely than is possible with the IRIS reviews, which are on a three year schedule. Large counties are reviewed annually, unless exempted, and medium and small counties every second and third year, respectively.

The added attention to this area by this department should convey to the counties the importance of case correction.

Implementation Status

Survey counties on case correction procedures	- Completed December 1990
Analyze survey findings	- Completed January 1991
Conduct on-site analysis of case correction procedures in selected counties	- Completed March 1991
Analyze findings and develop recommendations	- Completed April 1991
Prepare report of findings/successful procedures and send to counties	- Completed May 1991
Include a QC Error Case Correction Module in county IRIS reviews	- Continue through FFY 1993
Require counties to begin submitting documentation of case correction as part of their CAP	- May 1993

AIM Consultants to include
validation of error case
correction as part of county
visits

- May 1993

Evaluate rate of completion

- November 1994

Number

S-45-QC

Title

Products For Shelter Deduction Errors

Description

Shelter Deduction has remained among the top three error elements for the last six review periods. During the current period, it is the second leading cause of dollar errors for ineligible, overissuances and underissuances combined. The Operations Improvement Bureau (OIB) developed this action in 1990 to assist counties in addressing Shelter Deduction errors. The action initially included reviewing Corrective Action Plans submitted by many counties for several review periods and drawing out products or ideas that the counties had implemented to reduce Shelter Deduction errors. The emphasis was on those actions that the counties felt had been effective in reducing such errors, or which were newly implemented and appeared to be appropriate for the problems they were designed to address.

Products were also gathered from the OIB Clearinghouse and from consultants' knowledge of products in use in counties as a result of assessments or other contacts with the counties. The action also included a review of the products by Food Stamp policy staff to rule out obvious misinterpretations of policy inherent in the products.

As a result of these steps, the OIB compiled a written collection of 14 products and ideas ranging from client mailers to suggestions for data processing changes to alert workers to pending shelter deduction changes. This corrective action began in November with brainstorming by the Accuracy Improvement Consultants and the resulting collection of ideas was mailed to all county corrective action liaisons in April 1991.

This area continues to be statewide one of the top three error elements. However, our evaluation reveals that for the current April through September 1992 review period, the combined dollar error rate for Shelter Deduction is 18.8 percent, a second consecutive decrease from the prior rate of 22.7 percent. This is the lowest contribution to the statewide error rate by this element in the last four review periods. AIM analysts continue to inform counties of Shelter Deduction corrective actions as appropriate and the Bureau continues to monitor this element. This specific action is considered complete.

Implementation Status

Compile County level
corrective actions
for Shelter Deduction

- Completed December 1990

Analyze County level
corrective actions
for Shelter Deduction

- Completed January 1991

Select appropriate
County products and
ideas

- Completed February 1991

Review selected
products/ideas for
policy interpretation

- Completed February 1991

Prepare written
package for mailing

- Completed March 1991

Mail written package
to County liaisons

- Completed April 1991

Evaluate corrective
action

- Completed April 1992

Expand corrective
action through
regulation change

- Completed August 1992

Evaluate corrective
action

- Completed April 1993

Number

S-46-QC

Title

Large Eight Error Reduction Project

Description

The title of this project has been changed from the Seven County Partnership Effort to the Large Eight Error Reduction Project. Since FFY 1986, California's Food Stamp error rate has been above the national average and the federal tolerance level. The Food and Nutrition Service (FNS), the California Department of Social Services (CDSS), and several counties collaborated on a new project to reduce Food Stamp error rates in the seven largest caseload counties in an effort to bring the statewide error rate below the federal tolerance level in FFY 1991.

The seven counties which agreed to participate in this project were: Alameda, Fresno, Los Angeles, Orange, Sacramento, San Bernardino and San Diego.

FNS, CDSS, and the original seven counties committed to short term and long term error reduction actions. FNS agreed to consider all county and CDSS recommendations for review and revision of problematic federal policies, procedures and program provisions. FNS committed to pursue program improvements within their legal and fiscal constraints. Counties committed to refocusing their energies on operations improvements and contributing to CDSS and FNS project activities. CDSS modified its IRIS schedule and scope to allow an expanded IRIS review in each of the largest seven counties. An IRIS error reduction module was added to focus on reducing the reviewed county's error rate and/or assess the effectiveness of corrective actions already underway and/or assess the transferability of exemplary practices into or from the reviewed county. County management collaborated with CDSS IRIS staff to prescribe the focus of the error reduction module. AIM consultants also intensified their contacts and activities with these counties.

This corrective action has been extended and expanded to include an error reduction module in the upcoming IRIS reviews (for the FFY 1993) of all eight large counties scheduled for review. The counties were able to benefit from this module in large part because they were directly involved in determining the aspects of their operations to be included in the error reduction review. In this way the counties were able to utilize the expertise of IRIS team members and their own staff working together to attempt to resolve county error sources.

In December 1992, the Large Eight Error Reduction Project was developed. This was done because of the success of this project in the seven counties. Six of the seven counties from the Big Seven Project are participating in the Large Eight Error Reduction Project. The one exception is San Diego County, which reduced its Food Stamp error rate from 12.5 percent to 6.5 percent in October 1991 through March 1992 and 5.9 percent in April through September 1992. FNS rules allow any large county to be exempt from an IRIS review if its error rate is two percent or more below the last federal tolerance level (the 1991 FY tolerance level was 10.31 percent). Joining the six remaining counties to comprise the Large Eight Error Reduction Project are San Joaquin and Tulare Counties.

The State's Plan will continue to report on this corrective action during the life of this project.

Implementation Status

- | | |
|--|--|
| Compile barriers to Food Stamp Program integrity and brainstorm suggestions for eliminating/mitigating them | - Completed May 1991 |
| Meet with seven large counties to discuss ways to pursue above suggestions | - Completed August 1991 |
| Meet with seven large counties to secure commitment to project | - Completed October 1991 |
| Meet with seven large counties to discuss specific project goals and tasks | - Completed January 1992 |
| All seven counties will have an IRIS review with an error reduction module added to the normal IRIS scope. This will begin in October 1991 and continue through September 1992 | - Completed October 1992 |
| All large counties reviewed in FFY 1993 will have an error reduction module included in their IRIS | - Projected completion in October 1993 |

PART II

COUNTY LEVEL ACCURACY IMPROVEMENT

1. INDIVIDUAL COUNTY ERROR RATES

Results of the individual county QC reviews for the April through September 1992 review period are shown in Chart 15. Chart 16 presents the cumulative payment error rates (CPEs) for the individual counties for the last four review periods. This information assists the AIM consultants in identifying error rate trends in the counties over time and recognizing superior or improved performance.

California has 34 QC counties. Of these, 33 reported their QC error rates for the April through September 1992 review period. Merced County did not report its error rate because its QC staff were involved in refining Merced County's recently automated welfare eligibility system.

Samples for all of the individual county QC reviews (except Los Angeles) were randomly selected by the counties using the same master file which is used to draw the federal QC Sample. Because of its large caseload size, error rates for Los Angeles County are derived from its portion of the federal sample.

A comparison of county QC review findings for the April through September 1992 period with findings for the previous period reveals that CPEs increased in only ten counties and decreased or stayed the same in the remaining 23 counties. Overall, 24 counties (73 percent of the reporting QC counties) had CPEs below the most recent federal tolerance level of 10.31 percent based on national performance for FFY 1991.

CHART 15

FOOD STAMP COUNTY PAYMENT ERROR RATES
FOR INELIGIBLES AND OVERISSUANCES,
UNDERISSUANCES, AND CUMULATIVE
APRIL 1992 - SEPTEMBER 1992

	<u>Ineligibles and Overissuances</u>	<u>Underissuances</u>	<u>Cumulative*</u>
Alameda	7.1%	2.4%	9.5%
Butte	4.9	0.9	5.8
Contra Costa	2.6	1.7	4.3
Fresno	6.7	6.5	13.2
Humboldt	3.4	1.5	4.9
Imperial	7.9	4.7	12.6
Kern	1.0	0.6	1.6
Kings	5.0	3.4	8.4
Los Angeles	6.1	3.9	10.0
Madera	6.0	1.5	7.5
Mendocino	10.6	2.6	13.2
Merced	N/A	N/A	N/A
Monterey	11.2	2.1	13.3
Orange	8.4	3.9	12.3
Placer	4.5	4.7	9.2
Riverside	3.2	2.5	5.7
Sacramento	3.5	.9	4.4
San Bernardino	7.3	2.9	10.2
San Diego	3.6	2.3	5.9
San Francisco	9.4	2.1	11.5
San Joaquin	5.3	2.4	7.7
San Luis Obispo	3.7	2.9	6.6
San Mateo	4.9	3.7	8.6
Santa Barbara	7.7	3.0	10.7
Santa Clara	4.3	1.4	5.7
Santa Cruz	4.4	2.7	7.1
Shasta	4.2	2.3	6.5
Solano	4.4	2.4	6.8
Sonoma	5.7	1.2	6.9
Stanislaus	2.8	2.1	4.9
Tulare	7.9	7.4	15.3
Ventura	3.5	3.2	6.7
Yolo	4.0	1.8	5.8
Yuba	3.3	1.4	4.7

Data source information: Data are from the State QC sample for all counties except Los Angeles. Los Angeles County data are from the federal QC sample.

* Ineligible and overissuance percentages and underissuance percentages may not add to cumulative error rates due to rounding.

N/A: Not available.

CHART 16

FOOD STAMP
COUNTY CUMULATIVE
PAYMENT ERROR RATES

<u>County</u>	<u>April 1990- September 1990</u>	<u>October 1990- March 1991</u>	<u>April 1991- September 1991</u>	<u>October 1991- March 1992</u>
Alameda	12.5%	12.1%	9.6%	8.7%
Butte	7.1	11.6	8.8	7.5
Contra Costa	5.8	11.7	6.1	4.7
Fresno	12.7	14.2	13.4	16.4
Humboldt	1.0	6.6	6.7	4.6
Imperial	17.7	18.4	14.0	12.9
Kern	3.0	3.1	4.7	7.4
Kings	7.5	7.9	8.1	5.5
Los Angeles	10.5	12.9	9.6	11.4
Madera	7.3	6.5	8.2	8.3
Mendocino	16.6	10.1	8.7	10.9
Merced	N/A	N/A	N/A	N/A
Monterey	13.1	16.3	17.9	11.4
Orange	9.6	10.4	8.0	15.8
Placer	6.4	5.0	6.1	3.3
Riverside	7.8	11.4	6.3	7.3
Sacramento	8.2	6.8	5.9	9.2
San Bernardino	9.6	12.6	8.0	10.7
San Diego	14.5	13.2	12.5	6.5
San Francisco	9.0	8.3	10.6	7.5
San Joaquin	9.6	6.1	7.6	5.8
San Luis Obispo	8.2	8.9	12.5	9.4
San Mateo	14.5	8.3	11.3	7.7
Santa Barbara	7.7	12.3	10.4	11.1
Santa Clara	5.9	4.5	6.6	5.7
Santa Cruz	7.0	8.1	6.9	7.1
Shasta	7.7	5.1	8.5	8.4
Solano	6.1	6.8	7.8	8.3
Sonoma	7.3	7.4	6.2	4.7
Stanislaus	7.7	9.7	6.3	5.9
Tulare	19.4	15.9	13.7	19.3
Ventura	15.1	9.4	11.1	4.7
Yolo	7.6	9.2	7.5	12.4
Yuba	5.9	4.9	2.8	5.0

Data source information: State QC sample findings for all counties except Los Angeles. Federal QC Sample findings for Los Angeles County.

N/A: Not available.

2. OVERVIEW OF COUNTY ACCURACY IMPROVEMENT ACTIVITIES

As can be seen from Section 1 of Chart 17, California counties vary a great deal in size. California has categorized its counties based on AFDC caseload size. Large QC counties have AFDC caseloads greater than 15,000 cases. Medium QC counties have AFDC caseloads of approximately 4,001 to 15,000. Counties with AFDC caseloads of 1,400 to 4,000 are listed as small QC counties on Chart 17. The remaining counties are non-QC (self-monitoring) counties which do not perform QC reviews. However, they do conduct supervisory case reviews, quality assurance, or other internal monitoring procedures in order to identify errors and plan corrective action.

As a major error reduction activity, California counties prepare and submit Corrective Action Plans (CAPs) to the OIB twice a year. Plans are due February 1 and August 1 of each year. These CAPs constitute a major part of California's error reduction efforts. We believe that because county staff are directly involved in program administration at the local level, they are best able to analyze local problems and focus available resources for effective error reduction. Information on specific actions initiated by counties can be obtained by reviewing the CAPs submitted by the individual counties.

Each county is assigned an Accuracy Improvement (AIM) Unit consultant who reviews and evaluates the CAPs submitted by his or her respective counties and responds with detailed written comments. Consultants also communicate with their counties through telephone contacts and in-person visits. Because many effective error reduction activities occur at the county level, the role of the consultant is twofold: to help counties maintain their commitment to accuracy improvement, and to assist them in acquiring the problem solving skills and tools necessary to develop effective corrective action.

As Section 2 of Chart 17 indicates, 35 counties had active corrective action committees during the April through September 1992 review period. A significant part of accuracy improvement activities in these counties involves the work of the corrective action committees which typically meet monthly to identify problems, generate ideas, develop solutions and review the effectiveness of prior corrective actions. Another major activity of these committees is to generate and maintain staff motivation for error reduction and error prevention. AIM consultants frequently attend these meetings to assist committees with their corrective action efforts.

To further assist county staff in developing the necessary skills to reduce errors, AIM consultants work jointly with county staff to present problem solving training workshops. Two training formats are utilized: the Quality Control/Accuracy Improvement Awareness Workshop and the Nine-Step Problem Solving Workshop.

The Quality Control/Accuracy Improvement Awareness Training is a half-day workshop especially for eligibility staff. It provides them with information about the quality control process in their county and about skills they can use to solve problems at the unit level. The Nine-Step Problem Solving Workshop is a full day training session designed to teach enhanced problem solving skills to supervisors, lead eligibility workers, managers and other staff directly involved in corrective action planning. The basic format is modified to meet the needs of the individual county. Refer to Part I, Section 2, of this Plan for further information about this training.

In addition to participating in training to hone their problem solving skills, staff of California counties also enhance their error reduction capabilities by working together in regional networking groups. Section 3 of Chart 15 lists the counties that participate in these regional networks. Participation here allows counties to gain information, discuss mutual concerns, and share solutions to common problems. Currently there are seven networking groups throughout the State: the Northern Counties Corrective Action Committee, the Mother Lode Corrective Action Committee, the Bay Area Quality Control/Corrective Action Committee, Southern Counties AFDC Task Force, the Southern Counties Quality Control/Corrective Action Subcommittee, the Southern Counties Food Stamp Task Force, and the Valley Nine Network. AIM consultants regularly attend these meetings to share information and lend their support.

County line staff also network through participation in regional conferences. AIM consultants assist county regional groups in presenting five conferences each year. The Bay Area Counties Eligibility Workers Conference was held in October 1992. The Southern Counties Supervisors Conference was held in September 1992 and their Eligibility Workers Conference was held in June 1992. Planning was underway for the Valley Nine Supervisors Conference to be held in April 1993 and the Northern/Mother Lode Counties Eligibility Workers Conference to be held in May 1993.

These regional conferences provide line staff with the opportunity to share common concerns, discuss corrective action ideas, and acknowledge their key role in California's error reduction efforts.

The Operations Improvement Bureau Clearinghouse is another vehicle for sharing error reduction ideas. Corrective action products and tools are described in the Clearinghouse Catalog and are made available to counties and other organizations upon request. Section 4 of Chart 17 lists the 32 counties which requested products directly from the Clearinghouse during the April 1992 through September 1992 period. AIM consultants also made Clearinghouse products available to counties as part of the consulting process. For more information on the Clearinghouse, see "Overview of State Accuracy Improvement Activities" in Section 2, Part I of this Plan.

In summary, California's error reduction efforts are broad based. The common thread running through all these activities is an emphasis on assisting county staff in acquiring the skills, tools and motivation required for accurate casework.

CHART 17
COUNTY SUMMARY
April - September 1992

1. Counties are categorized by AFDC caseload size as follows:

Large QC Counties (More than 15,000 AFDC cases)

Alameda	Los Angeles	San Bernardino
Contra Costa	Orange	San Diego
Fresno	Riverside	San Joaquin
Kern	Sacramento	Santa Clara

Medium QC Counties (4,001 - 15,000 AFDC cases)

Butte	San Francisco	Sonoma
Humboldt	San Mateo	Stanislaus
Imperial	Santa Barbara	Tulare
Merced	Shasta	Ventura
Monterey	Solano	

Small QC Counties (1,400 - 4,000 AFDC cases)

Kings	Placer	Yolo
Madera	San Luis Obispo	Yuba
Mendocino	Santa Cruz	

Self-Monitoring (Non-QC) Counties (less than 1,400 AFDC cases)

Alpine	Lake	Plumas
Amador	Lassen	San Benito
Calaveras	Marin	Sierra
Colusa	Mariposa	Siskiyou
Del Norte	Modoc	Sutter
El Dorado	Mono	Tehama
Glenn	Napa	Trinity
Inyo	Nevada	Tuolumne

2. Counties with corrective action committees:

Alameda	Mendocino	San Luis Obispo
Butte	Monterey	Santa Barbara
Contra Costa	Napa	Santa Clara
El Dorado	Orange	Santa Cruz
Fresno	Placer	Shasta
Humboldt	Riverside	Sonoma
Imperial	Sacramento	Solano
Kern	San Bernardino	Stanislaus
Kings	San Diego	Sutter
Lake	San Francisco	Tulare
Los Angeles	San Joaquin	Ventura
Madera		Yolo

3. Counties participating in regional networking groups:

Valley Nine Network

Fresno	Madera	San Joaquin
Kern	Mariposa	Stanislaus
Kings	Merced (not participating)	Tulare

Bay Area QC Committee

Alameda	Sacramento	Santa Clara
Contra Costa	San Benito	Santa Cruz
Marin	San Francisco	Solano
Monterey	San Mateo	Sonoma
Napa		Yolo

Mother Lode Corrective Action Committee

Alpine	El Dorado	Sierra
Amador	Mariposa	Sutter
Butte	Nevada	Tuolumne
Calaveras	Placer	Yuba
Colusa		

Northern Counties Corrective Action Committee

Butte	Lake	Shasta
Del Norte	Lassen	Siskiyou
Glenn	Mendocino	Tehama
Humboldt	Plumas	Trinity

Southern Counties Quality Control/Corrective Action Subcommittee

Imperial	Orange	San Luis Obispo
Inyo	Riverside	Santa Barbara
Kern	San Bernardino	Ventura
Los Angeles	San Diego	

Southern Counties Food Stamp Task Force

Imperial	Riverside	San Luis Obispo
Kern	San Bernardino	Santa Barbara
Los Angeles	San Diego	Ventura
Orange		

4. Counties requesting products from the Corrective Action Bureau Clearinghouse:

Amador	Madera	Santa Cruz
Calaveras	Marin	Shasta
Colusa	Mariposa	Sierra
Contra Costa	Monterey	Siskiyou
Del Norte	Placer	Solano
El Dorado	Orange	Sonoma
Humboldt	Riverside	Stanislaus
Kings	San Bernardino	Sutter
Lake	San Francisco	Tuolumne
Lassen	San Joaquin	Yolo
Los Angeles	Santa Barbara	