



Minnesota Department of Human Services

Bulletin

NUMBER

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DATE

June 3, 2014

OF INTEREST TO

County and Tribal Human Services directors, Supervisors, Eligibility Staff

ACTION/DUE DATE

Please read for information and action

EXPIRATION DATE

June 3, 2016

Supplemental Nutrition Assistance Program Management Evaluation Review, 2013 results

PURPOSE

To inform county and tribal agency staff of the federal fiscal year 2013 Management Evaluation review results, and provide recommendations for program improvement.

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TERMINOLOGY NOTICE

The terminology used to describe people we serve has changed over time. The Minnesota Department of Human Services supports the use of "People First" language

Background

The Supplemental Nutrition Assistance Program Management Evaluation review is required by federal regulation to ensure that the program is being administered efficiently and effectively. The review is a tool that provides states, counties and tribes a systematic method of monitoring and assessing program operations, and a continuing flow of information among local agencies, states and the United States Department of Agriculture Food and Nutrition Service necessary to develop solutions to problems in program policy and procedure.

The management evaluation review helps identify and correct service delivery problems, improve program access and application processing rates, and meet program quality control performance standards for payment accuracy and negative case actions.

Federal regulations require site visits using a schedule based on county or tribal caseload size. County and tribal agencies are required to develop, submit and implement corrective action plans to the Minnesota Department of Human Services for review areas that do not meet performance standards and/or federal requirements.

Overall, management evaluation review priorities remain consistent, and support improved performance on the four Supplemental Nutrition Assistance Program federal performance measures. Most of the review areas are directly tied to the following performance measures:

- **Program Access Index** – Measures the state's average number of program participants over the course of a calendar year to the number of individuals with incomes below 125 percent of the official poverty line in each state.
- **Application Processing** – Measures how quickly human service agencies issue program benefits.
- **Payment Accuracy** – The payment error rate measures how accurately states issue program benefits to ensure participants receive the correct benefits, and to help preserve public confidence in the program.
- **Negative Actions** – The case and procedural error rate measures whether or not local agencies denied applicants or closed cases correctly and with proper notification.

States are awarded bonuses for high performance, including significant improvement in each of the four performance areas. See Attachment A – FFY 2012 SNAP High Performance Bonuses.

The following list is recommendations for SNAP program improvement to provide excellent customer service, remove barriers to access, improve processing timeliness and ensure payment accuracy.

Recommendations to improve program access include:

- Place applications in locations where potentially eligible people regularly visit, such as food shelves and senior centers.
- Provide easy access to applications by placing in multiple locations within your

- agency, without the need to request from agency personnel.
- Conduct business process re-engineering activities to determine if process efficiencies can be found to streamline application processes.
- Monitor phone calls to determine if agency gives correct information to potential applicants.
- Provide a link to the combined application form on agency's website.
- Implement the use of customer service surveys to gather information regarding customer satisfaction and quality of services. Timely feedback of customer perceptions can be used to improve services.
- Post a sign notifying customers to let front desk staff know if they have been waiting for more than 15-30 minutes.
- Maintain outreach activities currently in place. Find additional ideas at [Supplemental Nutrition Assistance Program Outreach](#) on the Food and Nutrition Services website. Sarah Aughenbaugh, SNAP, outreach coordinator for the department, is available for assistance at 651-431-3822, or sarah.aughenbaugh@state.mn.us.

Recommendations to improve application processing timeliness include:

- Review workers' pending reports (PND2) on the MAXIS eligibility system on a daily basis to avoid processing delays.
- Use this ["Mandatory Verification Tool"](#) to ensure workers are not requesting verification during the application process that is not required for the program.
- Review exception cases from the quarterly expedited and 30-day timely processing reports to obtain information on reasons for processing delays. Send an email to kathy.brueen@state.mn.us to request these reports.
- Interview clients when they submit their application. Immediate interviews save time by eliminating the need to play phone tag, provide appointment letters, and send Notice of Missed Interviews.
- Promote phone interviews to reduce lobby activity, customer wait times, and as a time saving measure.
- Provide training and periodic reminders to staff to ensure interviews for new applicants, add-a-program, and recertification are scheduled and conducted within 20 days of the application to ensure approval by day 30.

Recommendations to reduce payment and procedural errors include:

- Review ["Keys to Payment Accuracy"](#) document to learn about 10 key elements to ensure a low payment error rate, located on the Supplemental Nutrition Assistance Program Resource Web page.
- Conduct second party case reviews on cases containing income to find and fix errors.
- Review self-directed presentation on anticipating income, in the Training Toolkit on SIR, to ensure correct calculation of earned income.
- Review self-directed presentation on case notes, in the Training Toolkit on SIR, to learn who, what, when, where and why of case documentation in the MAXIS eligibility system.

- Implement Blue Zone scripts for error prone case actions and as a time saving measure. Contact veronica.cary@state.mn.us to schedule time to learn about how scripts can be used as an error reduction tool.

Additional recommendations include:

- Consider [Minnesota's LEAN initiative](#) to improve organizational performance and results in state and local governments. Use LEAN process improvement tools to increase efficiency, effectiveness and improve customer service. Training is free and open to all state, county and local governments.
- Visit the Supplemental Nutrition Assistance Program resource Web page on CountyLink to find tip sheets, links to bulletins, reports and other resources to assist in maintaining SNAP cases.

Supplemental Nutrition Assistance Program Management Evaluation Review results.

For federal fiscal year 2013, the Minnesota Department of Human Services conducted Supplemental Nutrition Assistance Program Management Evaluation reviews in the following county human service agencies: Anoka, Beltrami, Big Stone, Brown, Carlton, Carver, Chippewa, Chisago, Clearwater, Cook, Crow Wing, Dakota, Dodge, Freeborn, Grant, Hennepin, Hubbard, Isanti, Koochiching, Lac qui Parle, Lake, McLeod, Pine, Ramsey, Red Lake, St Louis, Scott, Sherburne, Sibley, Stevens, Traverse, Washington, Wilkin and Wright.

Program access

Excellent customer service plays a key role in maximizing access to Supplemental Nutrition Assistance Program benefits. Department quality assurance staff reviewed for 10 customer service practices to help ensure families, seniors and other adults have easy access to the program.

Review results

Excellent customer service practices identified include:

- Phone interviews are used as a common practice
- Eligibility workers and front desk staff ensure respectful and empathetic interactions with customers
- Expedited food benefits are provided by screening, interviewing and issuing benefits within 24 hours.

Customer service problems identified in many agencies:

- Applicants are not encouraged to complete and submit the Combined Application Form page one to set the date of eligibility
- Customers are not provided with a toll-free number, or collect calls are not accepted
- Staff are not available to answer questions during open business hours, and

- return did not phone calls timely
- Applicants are not provided with written confirmation of an interview in a timely manner
- Program verification policies are not followed
- Applicants are not provided with a Notice of Missed Interview, when applicable.

See Attachment B FFY 2013 SNAP Program Access results table.

Application processing timeliness

Federal regulations require that families and individuals eligible for SNAP be provided an opportunity to participate in the program within 30 days, and within five working days if eligible for expedited service. Approving benefits quickly maximizes federal dollars, and alleviates pressure on food shelves. Food shelves are continually challenged to meet the needs of individuals and families, many of whom may not qualify for program benefits.

Review results

Expedited service problems identified in many agencies:

- Applicants are not interviewed within five business days
- Applicants are not issued expedited benefits within five business days
- Verification that is not required for SNAP is requested
- Verification that is required is not postponed, as allowed by policy.

Thirty-day issuance problems identified in many agencies:

- Applications are in pending status for more than 30 days when verifications were requested timely
- Applicants are not interviewed timely to allow for approval within 30 days
- Verification is requested that is not required for approval of program benefits
- Verification that is received is not acted on timely
- The MAXIS eligibility system is coded incorrectly, resulting in inaccurate application pending notices (agency versus client delay).

The average combined (30-day and expedited) processing rate for the counties reviewed was 87 percent, lower than the statewide quality control timeliness rate of 92.4 percent.

The lowest 30-day processing rate for the 34 county agencies was 56 percent and the highest was 100 percent. Of the cases reviewed for expedited processing, the low was 33 percent and the high was 97 percent.

Two agencies met the 95 percent standard for timely expedited service processing and six met the standard for 30-day non-expedited processing. Corrective action plans were required in 32 of the 34 agencies reviewed.

A corrective action plan, requiring daily review of MAXIS REPT/PND2, is required of agencies not meeting the timeliness standards. Agencies that monitor this report daily typically have high application processing rates.

Payment accuracy

The Minnesota Department of Human Services, Supplemental Nutrition Assistance Program Quality Control section reviews more than 1,100 cases annually, and reports findings monthly to the United States Department of Agriculture, Food and Nutrition Service, to determine payment error rates for each state. Quality control data for 2013 shows 62 percent of all payment errors are in households with income, both earned and unearned. Statewide quality control results are in the Quality Control Accuracy Report on the Departments County Link website.

In addition to using quality control data, the department relies on county and tribal agencies to systematically conduct second party case reviews to determine the type and nature of errors made by agency staff, and devise corrective action strategies to improve error rates. Second party reviews help avoid over and under payments, and the additional work that is created each time an error occurs – establishing claims resulting from over payments and collecting the debt, which can often lead to intercepting household’s tax refunds when the debt is not voluntarily repaid.

Review results

Of 347 cases reviewed, 209 contained deficiencies.

The most common deficiencies identified were:

- Income was miscalculated (175 cases)
- Documentation of how income was calculated was missing or inadequate (100 cases)
- Shelter and utility expense deductions were incorrectly applied (82 cases)
- Dependent care and court-ordered expense deductions were incorrectly calculated (26 cases).

Case and procedural error rate

Review results

Of the 34 agencies reviewed, one met the 90 percent performance standard in this area.

The most common deficiencies were:

- MAXIS was coded improperly, resulting in inaccurate pending notices (34 agencies)
- MAXIS override functions “STAT/PACT” and “STAT/FIAT” were used incorrectly (27 agencies)
- Verification was requested that is not required for the program (21 agencies)
- Minnesota Department of Human Services 2919 A&B verification request forms were not used as required by policy (20 agencies).

Deficiencies identified from case file reviews in order of frequency	number of cases with deficiencies
Notice of denial or closure sent to household had incorrect reason(s)	169

Incorrect and/or incomplete verification request form used	82
STAT/PACT or FIAT was used incorrectly to determine eligibility	66
Verification was requested that is not mandatory for the Supplemental Nutrition Assistance Program	66
Pending notice reason was incorrect and/or notice was not sent timely	56
Ten days were not allowed for household to provide verification	42
Notice of denial was not sent timely to household	39
Case notes were inadequate, did not clearly describe actions taken	35
Other	16
Appointment letter and/or Notice of Missed Interview were not sent to household	11
Verifications were not provided to the Minnesota Department of Human Services, as requested, for the Management Evaluation Review	7

Data security

Data must be protected from view of unauthorized persons by positioning monitors away from doors, windows, busy hallways or using screen protectors. Sharing passwords is also strictly prohibited.

Review results

Security Measures	Number of counties passed	Number of counties failed
Computers locked, logged off, or turned off when staff leave their desk	32	2
Protected data is secured from view by unauthorized persons	25	9
Passwords kept secure	34	0

Civil rights

Review results

Civil Rights Requirements	Number of counties passed	Number of counties failed
Annual training provided	33	1
All agency produced documents pertaining to the Supplemental Nutrition Assistance Program contain non-discrimination statement	30	4
"And Justice for All" poster displayed	34	0
Advocacy comments were positive	31	3

Recipient claims management

For federal fiscal year 2013, Carver, Dakota, Pine, Ramsey, and Washington County, were selected for review to determine the validity and accuracy of established claims.

Review results

Deficiencies identified in the 79 claims reviewed included:

- 29 claims had inaccurate claim amounts
- 27 claims had inaccurate time periods
- 26 claims lacked documentation substantiating how and why claims were established and calculated
- 25 cases had inaccurate discovery dates.

FFY	percent of claims reviewed correct
2013	25%
2012	31%
2011	35%

Federal Fiscal Year 2014 Supplemental Nutrition Assistance Program Management Evaluation Review

Agencies with reviews due for FFY 2014 were notified in January 2014. For information on review content see Attachment C.

Attachments

Attachment A FFY 2012 SNAP High Performance Bonuses

Attachment B FFY 2013 SNAP Program Access results table

Attachment C FFY 2014 SNAP-ME Review Areas

Americans with Disabilities Act Advisory

This information is available in alternative formats to individuals with disabilities by calling 651-431-3936 (voice). TTY users can call through Minnesota Relay at 800-627-3529. For Speech-to-Speech, call 877-627-3848. For additional assistance with legal rights and protections for equal access to human services programs, contact your agency's Americans with Disability Act coordinator.

FFY 2012 SNAP HIGH PERFORMANCE BONUSES

BEST PAYMENT ACCURACY				
State	Payment Error Rate (PER)			Bonus Amount
Florida	0.77			\$8,072,238
Alaska	1.07			\$265,714
South Dakota	1.37			\$296,973
Louisiana	1.45			\$1,945,592
South Carolina	1.59			\$1,892,369
Illinois	1.74			\$4,092,147
Virginia	1.76			\$2,020,886
Alabama	1.85			\$1,897,845
Wisconsin	2.07			\$1,842,047
National Average	3.42			
Minnesota	5.07			
MOST IMPROVED PAYMENT ACCURACY				
State	FY 2011 PER	FY 2012 PER	Change	Bonus Amount
Alabama*	5.10	1.85	-3.25	See best above
Maryland	6.06	3.40	-2.66	\$1,674,189
Louisiana*	3.97	1.45	-2.52	See best above
Total				\$24,000,000
BEST CASE AND PROCEDURAL ERROR RATE				
State	Rate			Bonus Amount
South Dakota	1.88			\$509,861
Alaska	6.95			\$444,817
Mississippi	7.28			\$2,793,953
North Dakota	8.33			\$347,755
New Hampshire	11.94			\$612,010
Maine	13.02			\$1,291,604
National Average	27.27			
Minnesota	26.21			
MOST IMPROVED CASE AND PROCEDURAL ERROR RATE				
There are no "Most Improved Case and Procedural Error Rates" as this is the first year. The Case and Procedural Error Rate cannot be compared to the prior negative error rate. For FY 2012, FNS awarded two additional "Best" awards for the Case and Procedural Error Rate.				
BEST PROGRAM ACCESS INDEX				
State	Rate			Bonus Amount
Delaware	108.18			\$590,844
District of Columbia	106.45			\$662,568
Maine	99.53			\$1,025,417
Oregon	96.42			\$3,256,420
Maryland	95.12			\$2,643,853
National Average	Not Available			
Minnesota	Not Available			
MOST IMPROVED PROGRAM ACCESS INDEX				
State	FY 2011	FY 2012	Change	Bonus Amount
Delaware	98.88	108.18	9.31	See best above
Hawaii	79.35	88.44	9.08	\$724,139.00
Iowa	76.58	83.75	7.17	\$1,445,729
Connecticut	77.66	84.39	6.73	\$1,651,030
Total				\$12,000,000
BEST APPLICATION PROCESSING TIMELINESS RATE				
State	Rate			Bonus Amount
Idaho	99.28			\$766,398.00
New Mexico	97.85			\$1,383,473
Kentucky	97.26			\$2,770,591
North Dakota	96.62			\$280,825
District of Columbia	96.41			\$628,695
Virgin Islands	95.38			\$170,018
Total				\$6,000,000
National Average	Not Available			
Minnesota	94.06			

Sanction States for FY 2012 are Guam, Missouri, Nevada, Rhode Island, Vermont, West Virginia and Wyoming.

PROGRAM ACCESS				
<i>Ten customer services practices are reviewed that help ensure customers have easy access to the Supplemental Nutrition Assistance Program and/or receive benefits in a timely manner.</i>				
Customer Service Practices Review Findings				
Total number of customer service practices:	10	Yes	No	Comments
1. Is a CAF available upon request? <i>CM 0005.03</i>	29	5		
2. Are applicants informed when they call and/or stop in the office that the date the CAF Page 1 is received determines the date benefits begin? <i>CM 0005.03</i>	9	25		
3. Are interviews scheduled in writing for applicants not interviewed the same day they submit their CAF? Are appointments documented or Spec/Memo used? <i>CM 0005.12.12, TE 02.05.1, 5, PQ 5387</i>	19	15		
4. Are applicants informed of their responsibility to reschedule when an initial and recertification interview is missed? (NOMI) <i>CM 0005.12.12, TE 02.05.15</i>	30	4		
5. Are applicants screened for expedited SNAP eligibility throughout all open business hours? <i>CM 0004, 0005</i>	31	3		
6. Are workers available during all office hours to answer questions on programs, eligibility requirements and how to apply? <i>CM 0005.03</i>	26	8		
7. Are applicants informed of the option to interview by phone and is their choice accommodated? <i>CM 0005.12.12</i>	31	3		
8. Are clients provided a toll-free telephone number or number where collect calls will be accepted? <i>CM 0007.12</i>	26	8		
9. Are customers treated respectfully, courteously, fairly and with understanding? <i>CM 0003.09.03</i>	30	4		
10. Are SNAP verification policies followed including limiting verification to mandatory requirements, not requiring specific documents or forms, assisting customers having trouble getting proof and accepting a customer's signed statement when proof is not available. <i>CM 0010 and CM 0010.18.02</i>	29	5		
Customer Service Practices Totals	260	80		
One or more corrective actions were required in 28 of 34 agencies reviewed for this area.				

ADDITIONAL PROGRAM ACCESS INFORMATION

The purpose of this section is to share information received during the review process regarding program access from the perspective of a potential customer, advocacy groups and customers from your agency.

Anonymous Call

Summary information from anonymous phone call regarding program access at initial contact.

Most of the agency phone numbers were available on the Internet and from directory assistance, and most agencies accepted collect calls or had a toll-free number. The anonymous phone calls revealed counties were willing to help the customers. The common problem areas were not explaining the importance of completing the CAF page 1 and expedited processing to applicants.

Advocacy Contacts

Summary information from local advocacy contacts regarding program access. For information regarding civil rights see page 11.

Several advocacy contacts commented that agency staff were courteous, willing to help customers and refer to other resources. Negative comments included customers being overwhelmed with a high volume of paperwork and/or a time-consuming application process, rude treatment and workers failing to return phone calls. Some agencies recommended enhanced outreach and hiring of more staff.

Customer Service Rating

This rating is the result of customers rating their experience(s) with their agency. The scale used is 1 (poor) - 5 (excellent).

Number of customers surveyed:	297
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Average customer service rating:	4.12
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The customer surveys indicated most agency staff to be polite, courteous and helpful in answering questions. Common negative comments included difficult to reach workers and phone calls not being returned.

FFY 2014 SNAP-ME Review Areas

NOTE: Review areas must meet set compliance levels to avoid a Corrective Action Plan (CAP).

Program Access - Customer Service Practices - See combined manual (CM) §0003.09.03, §0004, §0004.04, §0004.06, §0005, §0005.03, §0005.09.15, §0005.12.09, §0005.12.12, §0007.12, §0009.06.06, §0010, §0010.18.02, temp manual (TE) 02.05.15, Code of Federal Regulations (CFR) 273.2(c)(1), (2) & (3), 273.2(e) (3), Policy Quest (PQ) 5387, 273.2(I) (2)

- Application forms must be readily accessible and provided on request to all. Forms should be freely available to anyone without the need to make multiple phone calls, see a screener, answer additional questions, complete additional forms, or stand in long lines. If a request is received by phone or mail, it should be mailed the same day.
- Customers must be informed when they call and/or stop in the office that the date the application page one is received sets the date SNAP benefits begin. The agency must accept and file an application with only a name, address and signature.
- Customers not interviewed at the time the application/recertification is submitted, must have an interview scheduled with written confirmation given whether hand delivered or sent through ApplyMN, mail or fax. The written confirmation is to be documented (SPEC/MEMO or copy in file) and include a time frame (a reasonable window of time – maximum of four hours), a specific date and location.
- Customers (both applicants/recipients) must be informed of their responsibility to reschedule when an initial or recertification interview is missed by sending the SPEC/LETR Notice of Missed Interview (NOMI).
- Agency staff must screen applications for expedited SNAP eligibility during all open office hours - including over the lunch hour and end of the day. (This includes applications dropped off, received by mail, FAX, or ApplyMN.)
- Staff must be readily available during all open office hours to answer questions about programs, eligibility requirements, and how to apply. Being available includes potential/initial SNAP customers being able to contact the agency by phone to obtain information on the application process and other questions, customers being able to leave phone messages, having phone calls returned timely, and not waiting an excessive amount of time in the agency to be seen.
- Customers must be informed of the option to be interviewed by phone, and their choice must be accommodated.
- Customers must be provided with an agency toll-free phone number or a number where collect calls will be accepted.
- Customers must be treated respectfully, courteously, fairly, and with understanding.
- SNAP verification policies must be followed, including limiting verification to mandatory requirements, not requiring a specific document or form, assisting customers having trouble getting verification and accepting a customer's signed statement when verification is not available.

Application Processing - Expedited Service and 30-day Application Processing:

Expedited: See CM §0004.04, §0004.06, §0004.09, §0004.12 §0004.15, §0005.12, §0005.12.09, TE02.10.01, TE02.10.79.

- Are applications determined eligible for expedited service?
- Are applications processed within five working days of the application date?

30-Day Processing: See CM §0005.12, §0005.12.09, §0005.12.15.

- Are applications processed within 30 days of the application date?

Processing Timeliness: See CM §0005.12.09, §0005.12.12, §0005.12.15

- Is the agency, as a whole, reviewing MAXIS REPT/PND2 daily?

Payment Accuracy - Cases approved to receive benefits: See CM §0016 -16.42, §0017 - 0017.15.99, §0018 - 0018.42, §0019.18 - 0019.09, §0020 - 0020.24, §0022 - 0022.24, TE02.05.54 and 55. Six Month Reporting Q & A, Guidebook about Child Support and Food Support

- Are processing actions and calculations accurate in cases approved to receive benefits including:
 - Income calculations
 - Shelter and utilities deductions
 - Other deductions
 - Verification
 - Actions entered in CASE/NOTE

Negative Actions - SNAP Case and Procedural Errors: See CM §0004, §0004.04, §0004.06, §0004.09, §0004.15, §0005.09.12 §0005.12.12, §0005.12.15 - 0005.12.15.15, §0010 - §0010.18, §0010.18.02 §0010.21, §0026.03, §26.09 §0026.15, TE02.05.15, TE02.08.096, TE02.08.012, TE02.13.10.

- Are negative actions appropriate? ***Inappropriate actions include:***
 - Failure to send an appointment letter or Notice of Missed Interview (NOMI) when required.
 - Denial or termination for failure to provide verification that was not required.
 - Failure to allow client 10 days to provide requested verification/cooperation.
 - Failure to issue a 10-day notice of adverse action when a client fails to provide the requested verification by the specified due date. The 10-day verification request period and the 10-day notice of adverse action cannot overlap.
 - Denial prior to the 30th day when verification was requested or an interview was missed.
 - Denial of an application after the 30th day when not properly pended.
 - Failure to take action on an application by the 60th day following the date of application.
 - Failure to use the Verification Request forms, DHS-2919A/B, to request verifications and documenting the request in the case file.
 - Failure to ensure all denial or termination reasons on the notice are accurate.
 - Failure to document negative actions in CASE/NOTE.

Data Security - See CM §0010.24.21, Internal Revenue Service (IRS) Publication 1075, and Bulletin 13-69-09.

- Are passwords shared?
- Is the agency avoiding inadvertent disclosure of protected data by:
 - Workers shutting off the computer, or
 - Workers logging off the computer, or
 - Workers locking the state screen when away from their desks?
 - Ensuring that anyone entering the work area and viewing computer screens have a business need to view the case information displayed?
- Are computer screens facing away from view of unauthorized personnel (including windows and walkways), or are screen protectors used to shield data?
- Eliminating the possibility of unauthorized people overhearing personal data during interviews?
- Has the agency implemented the use of FTI Destruction logs?
- Has the agency implemented the use of Visitor Access logs?

Civil Rights - See FNS 113-1 Section IX A (4) and B (1), XI.

- Is civil rights training provided annually for all front-line staff?
- Are the required posters displayed prominently? These include:
 - “And Justice for All” (AD-475B 12/99).
 - Green and White Expedited Poster (state poster).
- Are the non-discrimination statement/compliant procedures on all agency-developed printed and printable materials representing SNAP?

Claim Establishment - See CM §0025

- Discovery date - CM §0002.15, TE19.151
 - Is the discovery date identified as the date an agency receives all documentation necessary to calculate a claim?
 - Is the discovery date documented and accurately entered in the CCOL function on MAXIS?
- Time period - CM §0025.06, TE02.09.01
 - Is the beginning and ending month on consecutive claims accurately entered in the CCOL function on MAXIS?
- Timeliness - CM§ 0025.12.12
 - Is recovery of claims initiated within the quarter following the quarter of discovery, and are claims established by the end of the calendar quarter in which an overpayment was identified?
- Amount – CM §0025.12.06
 - Is the amount of a claim accurate based on claim policy?

- Documentation – CM §25.06, TE19.049, TE02.08.095
 - Did the case file contain all documents and verifications to substantiate the validity of the claim?
- Responsibility – CM §0025.12.06 CM §25.30
 - Are overpayments recovered from responsible members who received more benefits than they were eligible to receive?
- Other – CM §0025.12, TE02.09.01, TE02.09.18
 - Is the basis of the claim accurate (household, agency, fraud) and is it coded correctly in the CCOL function of MAXIS?
 - Is documentation of a claim retained according to retention policy time frames from the date the claim is paid in full?
 - Is documentation related to establishment of a claim retained in the originating county when a financial case is referred to another county?
 - Is Electronic Benefits Transfer (EBT) out-of-state usage policy applied appropriately?
 - Are claim fraud processes applied appropriately?
 - Is the Judgment of Law (JOL) process established and utilized by the agency?