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I. STATEMENT OF POLICY

X-110-PO MANAGEMENT EVALUATION REVIEW

FNS requires that the State ensure that the Parish Offices operate the Supplemental Nutrition Assistance Program (SNAP) in accordance with the Food and Nutrition Act, regulations, and FNS-approved State Plan of Operation. To ensure compliance with program requirements, Management Evaluation (ME) Reviews must be conducted to measure compliance with the provisions of FNS regulations. The objectives of ME reviews are to:

- Provide a systematic method of monitoring and assessing program operations in the local offices;
- Provide a basis for local offices to improve and strengthen program operations by identifying and correcting deficiencies; and
- Provide a continuing flow of information between the local offices, the States, and FNS, necessary to develop solutions to problems in program policy and procedures.

X-111-PO MANAGEMENT UNITS

The agency must conduct a review once every year for large offices, once every two years for medium offices, and once every three years for small offices, unless an alternate schedule is approved by FNS. The Parish Office Size Management Units are listed below:

- Small Parishes – offices containing caseload sizes less than 5000.
- Medium Parishes – offices containing caseload sizes of 5000-25,000.
- Large Parishes – offices containing caseload sizes more than 25,000.


X-112-PO REVIEW COVERAGE

During each review period, the agency is required to review the national target areas of program operation specified by FNS. FNS notifies the Department of the minimum program areas to be reviewed before the beginning of each Federal Fiscal Year.

The agency is responsible for reviewing each national target area or other program requirement based upon the provisions of the regulations governing the SNAP and the FNS-approved Plan of Operation.

X-113-PO REVIEW ACTIVITIES

During the review period, Economic Stability (ES) Consultants, Parish Offices, and the SNAP Section designees are required to complete Pre-review, Review and/or Post-review activities. Refer to X-113-PR for these activities.

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X-114-PO MANAGEMENT EVALUATION CASE VALIDATIONS

The SNAP Program ES Consultants are required to read a specific number of cases for the Management Evaluation Review. The number is determined by the size of the management unit as identified in Section X-111-PO:

- 20 SNAP cases for those offices identified as small (less than 5000)
- 30 SNAP cases for those offices identified as medium (5000-25,000)
- 40 SNAP cases for those offices identified as large (more than 25,000)

Case Readings will consist of an equal number of approvals, re-certifications, semi-annual reports, negative case actions, and processed changes.

X-115-PO MANAGEMENT EVALUATION INTERVIEWS

The SNAP ES Consultants are required to observe and critique client interviews and conduct grassroots organization surveys during the review. The Critique of Client Interview Form and Grassroots Organization Survey Form are a part of the Management Evaluation Review Form. The client and grassroots organization surveys are used as program access tools.

X-116-PO PUBLICATIONS

During the on-site review, the SNAP ES Consultants are required to observe whether required posters are displayed in the Parish Office, and whether any publication displayed or provided to SNAP clients contain the required non-discrimination statement.


The USDA Nondiscrimination poster, “And Justice for All”, is to be displayed in each Parish Office as required by the Civil Rights Act of 1964 and Food and Nutrition Services.

The Language Line Solutions “Interpretation Services Available” poster must be prominently displayed in each Parish Office. This is a requirement of LDH Bureau of Legal Services – Civil Rights section.

The “SNAP Rights” poster is to be displayed in each Parish Office.

The use of the following posters is optional:

- Computer Security
- Computers Talk
- Fraud Hotline
- LA Purchase Card Benefit Dates
- Parenting Skills Training
- Case Processing Time (CPT) Information

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All posters, flyers, brochures, etc., specific to SNAP are to be reviewed to ensure that they contain the proper non-discrimination statement. All documents that provide information about SNAP must contain the required non-discrimination statement that can be found on the [LDH](http://www.LDH.louisiana.gov) website at www.LDH.louisiana.gov in the Economic Stability/SNAP section. All SNAP information printed by [LDH](http://www.LDH.louisiana.gov) must be approved by the Bureau of Communication and Governmental Affairs.

X-117-PO CIVIL RIGHTS (CR)

Civil Rights compliance will be reviewed at the time of each ME review. The following areas will be reviewed:

- Collection and use of data,
- Effective public notification systems,
- Complaint procedures,
- Compliance review techniques,
- Resolution for noncompliance,
- Requirements for reasonable accommodation of persons with disabilities,
- Requirements for language assistance,
- Conflict resolution,
- Customer Service,
- Civil Rights Assurances,
- Civil Rights Training, and
- Verification of Immigration and Citizenship.


Findings in the area of Civil Rights compliance will be documented on the [OFS MER 1 Attachment](#) and kept in the official ME file. A copy of all Civil Rights compliance reviews will be given to the Civil Rights Section for review prior to performing the exit conference with parish office staff.

X-117-1-PO FNS 101 Report

State office staff will review the FNS 101 reports and compare data to race and ethnicity to the composition of the reviewing area to adequately assess whether the State agency is serving its populations. (See [FNS instructions 113-1](#) on the use of race and ethnicity data collection for trends analysis.)

X-118-PO CALL CENTER REVIEW

A review of the Statewide Call Center will be completed annually to ensure that services are being provided to applicants and program participants in compliance with program access requirements in accordance with the Food and Nutrition Act, regulations, and the FNS-approved State Plan of Operation. The review of the Statewide Call Center will be completed remotely. The objectives of the call center ME review are:

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- Assess the advantages or disadvantages of the current system from a SNAP regulatory and customer service prospective;
- Provide a basis to improve and strengthen call center operations by identifying and correcting deficiencies;
- Assess compliance with program access requirements;
- Assess the call center internal controls;
- Review the training program resources provided to new and experienced staff, including civil rights training.
- Determine if there are an adequate number of lines to handle call volume and assess the potential for calls being dropped from the queries.

See X-117-PO for Civil Rights compliance. Findings will be documented on the [OFS MER 2 Attachment](#).

X-119-PO DOCUMENT PROCESSING CENTER REVIEW

A review of the Document Processing Center (DPC) will be completed annually to assess the center’s compliance with the DPC Operational Plan with the following objectives:


- Assess the compliance of the DPC’s operational work flows and mailroom procedures such as mail receiving, mail sorting, document scanning and handling (including mis-directed mail and other mail requiring special handling), document archival and storage, and procedures for returning original documents. This includes procedures for processing of day forward mail, including documents received via fax or e-mail.
- Review and assess the DPC’s assignment of documents to the missing key words and unidentified recipient queue.
- Assess operational work flows and procedures that allow **LDH** to scan index and retrieve documents.
- Assess the DPC’s compliance in regards to performance quality, timeliness, and service delivery with the DPC’s Quality Assurance Plan.
- Review operational work flows and procedures for back file document processing.
- Review the training program resources provided to new and experienced staff, including civil rights training.

See X-117-PO for Civil Rights compliance. Findings will be documented on the [OFS MER 3 Attachment](#).

II. PROCEDURES

X-110-PR MANAGEMENT EVALUATION REVIEW

Management Evaluation Reviews must be conducted using the Management Evaluation Review form ([OFS MER 1](#)) and the appropriate Civil Rights compliance tool ([OFS MER 1 Attachment](#)).

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X-111-PR MANAGEMENT UNITS


State Office will determine the size designation of each office at the end of the Federal Fiscal Year by determining how many workers in each office are assigned to SNAP cases.

X-112-PR REVIEW COVERAGE

During each review period, the agency must review each national target area or other program requirement based upon the provisions of the regulations governing the SNAP and the FNS-approved Plan of Operation.

X-113-PR REVIEW ACTIVITIES

- Pre-review activities:
 - SNAP ES Consultant:
 - Notify the Regional Administrator, Area Director, and Economic Stability Manager of the review.
 - Establish an office contact.
 - Review the submitted Management Evaluation Review form for accuracy and completeness.
 - Generate a case reading sample.
 - Parish Office:
 - Provide an office contact.
 - Complete Management Evaluation Review form.
 - Send the completed form to the SNAP ES Consultant by the 10th of the month prior to the review month.
- Review activities:
 - SNAP ES Consultant:
 - Conduct an entrance conference with management staff.
 - Complete the case readings.
 - Conduct an on-site review of office processes.
 - Review the case reading findings.
 - Conduct an exit conference with staff.
- Post-review activities:
 - Parish Office:
 - Complete case validation forms and correct cases as needed.


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- Develop corrective action plans for applicable review areas and submit to the SNAP ES Consultant for approval.
 - Perform corrective action activities.
 - Complete corrective action plan follow-up.
- SNAP ES Consultant:
- Request parish office staff review case readings and provide responses to the SNAP ES Consultant within 3 weeks following the review.
 - Forward a copy of the Civil Rights Compliance Review to the **LDH Bureau of Legal Services** – Civil Rights Section for review, and comments prior to performing the exit conference with the parish office staff.
 - Review applicable corrective action plans submitted by the Parish Office to determine if the plan is appropriate. If appropriate, provide approval.
 - Forward the written corrective action plan to the SNAP section, the Regional Administrator, Area Director, the Deputy Assistant Secretary of Family Support, and **LDH Bureau of Legal Services** – Civil Rights section, if applicable within 10 days from the day of the exit interview.
 - Follow-up on corrective action plans following completion.
 - Forward the completed Management Evaluation Review form supporting documentation to the SNAP Section by the 15th of the month following the review. A copy must be sent to the Area Director, the Regional Administrator, and the Deputy Assistant Secretary of Family Support.
- SNAP Section:
- Review the Management Evaluation Review form and supporting documentation for analysis and evaluation.
 - Forward the Civil Rights Review paperwork to the **LDH Bureau of Legal Services** – Civil Rights Section for review and response.
 - Forward the Management Evaluation Review form and supporting documentation to the Food and Nutrition Services Desk Manager for Louisiana by the end of the month following the review month.

The **LDH Bureau of Legal Services** – Civil Rights Section Representative shall accompany SNAP ES Consultants to 2 – 3 local parish offices each year to ensure the civil rights portion is being completed correctly and provide a visible presence in the offices to assist with civil rights issues.

In cases where deficiencies are noted and the Economic Stability Manager submitted a corrective action plan, the SNAP ES Consultant will:

- Revisit the Parish Office no more than two months after the initial review in order to follow up on corrective action plans developed for non-compliance.

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Provide a report to the SNAP Director stating whether the corrective action taken on the deficiency is effective. The report is due the 15th day of the third month following the Management Evaluation due date to the SNAP Section.

X-114-PR MANAGEMENT EVALUATION CASE VALIDATIONS

The SNAP ES Consultants are required to conduct case reviews for each Management Evaluation Review based on the number identified in X-114-PO.

X-115-PR MANAGEMENT EVALUATION INTERVIEWS

The SNAP ES Consultants are required to observe and critique at least two client interviews during the review.

The SNAP ES Consultants are required to interview at least two grassroots organizations during the Management Evaluation Review. This contact may be with any organization that works with **LDH**.

X-116-PR PUBLICATIONS

The SNAP ES Consultants must observe posters displayed in the office lobby as well as Kiosk area and interviewing areas to determine if the posters identified in X-116-PO are visible.

X-117-PR CIVIL RIGHTS

Civil Rights compliance will be reviewed by the SNAP ES Consultant at the time of each ME review. Please refer to X-117-PO Civil Rights for details of the review process.


X-118-PR CALL CENTER REVIEW

Management Evaluation Reviews must be conducted using the Management Evaluation Review – Call Center Operational Procedures form ([OFS MER 2](#)) and the appropriate Civil Rights compliance tool ([OFS MER 2 Attachment](#)).

X-118-1-PR On-going Review Activities – SNAP ES Staff

Perform the following tasks to determine client access via telephone:

- On a monthly basis, conduct a series of anonymous phone calls to the call center, posing as applicants or clients in order to assess the adequacy of services provided and perform the following:
 - Measure overall performance;
 - Measure responsiveness at various times of the day or week;
 - Use the review tools (Call Center Review Log Sheet) as part of the ME.

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- On a weekly basis, listen in on live phone calls at the call center in order to assess the adequacy of service provided. If it is not possible to listen to live phone calls, recorded phone calls are to be provided by the call center for review.


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Perform the following tasks to determine client access via telephone:

- Assess call center metrics to determine accessibility, including:
 - Number of calls received,
 - Percentage of calls answered by staff,
 - Percentage of calls abandoned,
 - Handling time (average, median, modes), both recent and historical, and
 - Answer speeds (average, median, modes), both recent and historical.

Perform the following assessment of call center internal controls:

- Assess the call center management structures by looking at:
 - Organization charts and work assignments,
 - Call center policies and procedures,
 - Metrics used to manage workload, and
 - Methods for receiving and routing calls.
- Assess the call center monitoring process by determining:
 - Whether there is consistent monitoring performed by specialized staff,
 - Whether the worker/supervisor has the ability to listen to his/her calls so that call behaviors are clearly identified,
 - Whether there are guidelines used when monitoring calls, and whether these are regularly assessed for relevance and accuracy, and
 - Whether there is involvement from Operations and Training personnel to keep the call monitoring efforts relevant and in line with the needs of the operation.
- Review and assess monitoring reports:
 - Review available data or reports on the center’s activity for the last twelve months regarding:
 - wait times,
 - hold times,
 - abandonment rate,
 - quality of call agent customer service,
 - number of inquiries resolved by the IVR, and

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- types/reasons for calls.
- Review call center’s performance standards and measures, such as:
 - length of time for caller to get through to a live agent,
 - percentage of calls dropped by the system,
 - percentage of calls abandoned by the caller, and
 - frequency with which the caller gets a busy signal or is told to call back later.
- Review performance standards data to determine if standards are being met in regards to:
 - Quality of call agent customer service,
 - Number of inquiries resolved by the IVR, and
 - Types/reasons for calls.
- Review with the contract monitor how adequate staffing levels are determined, including any contingency plans in place to cover extra high volume days (such as first days of the month, Mondays, day after holiday weekends, day after disasters, etc.),
- Explore with call center staff if there are adequate number of lines to handle call volume and assess the potential for calls being dropped from queues, and
- Review the training program resources provided to new and seasoned staff, including civil rights training.


X-119-PR DOCUMENT PROCESSING CENTER REVIEW

Management Evaluation Reviews must be conducted using the Management Evaluation Review – DPC Operational Procedures form ([OFS MER 3](#)) and the appropriate Civil Rights compliance tool ([OFS MER 3 Attachment](#)).


X-119-1 - PR Annual Management Evaluation Review SNAP Program Staff

Perform the following tasks to determine performance quality, timeliness, and service delivery, and to determine compliance with the DPC Operational Plan:

- Assess the mail room metrics to determine performance quality and efficiency, including:
 - Document Preparation for Day Forward Mail,
 - Document Scanning, and
 - Special Handling.
- Assess Back File Document Processing procedures by looking at:

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- Image Quality Control Process,
 - Preventative Maintenance on Equipment,
 - Document Archiving,
 - Document Retrieval from Archive, and
 - Document Destruction.
- Assess Document Processing procedures by determining:
 - Whether all fax lines are operational, and both fax and e-mail transmissions are handled properly, and
 - Whether documents are classified and indexed properly.
 - Assess the Quality Assurance Metrics:
 - Document Data Accuracy,
 - Document Image Quality (view a sample of documents), and
 - Exception Document Processing/Queue Monitoring for items rejected for image quality.
 - Assess System-Related Corrective Action Activities by determining:
 - Whether the proper IT personnel and **LDH** staff are notified in the event that files received are missing, corrupt, or incomplete once files are imported from the server to the MCI Database,
 - Whether procedures for notifying all parties are followed in the event of a system error,
 - Whether system upgrades are thoroughly tested prior to being moved into production, and
 - Whether **LDH** is properly notified in the event that a system reset occurs during business hours.
 - Review performance data to determine if timeliness standards are being met,
 - Review with the contract monitor how adequate staffing levels are determined, including any contingency plans in place to cover extra high volume days (such as first days of the month, Mondays, day after holiday weekends, day after disasters, etc.),
 - Review with contract monitor if the **LDH** is following procedures as listed in the contract/Operational Plan, and
 - Review the training program resources provided to new and seasoned staff.

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III. FORMS AND INSTRUCTIONS

OFS MER 1 [Form](#) / [Instructions](#) Management Evaluation Review – Parish Office Operational Procedures

OFS MER 1 Attachment [Form](#) / [Instructions](#) Attachment for Parish Office

OFS MER 2 [Form](#) / [Instructions](#) Management Evaluation Review – Call Center Operational Procedures

OFS MER 2 Attachment [Form](#) / [Instructions](#) Call Center

OFS MER 3 [Form](#) / [Instructions](#) Management Evaluation Review – DPC Operational Procedures

OFS MER 3 Attachment [Form](#) / [Instructions](#) Document Processing Center

IV. REFERENCES

[7 CFR 275.5](#)