

A closer look at today's SNAP environment





Serving your SNAP-eligible and SNAP-enrolled population is easier. By giving you “new flexibility to make operations more efficient while improving customer service,” FNS expanded the list of services non-merit staff can perform in SNAP operations.

New flexibility in SNAP policy

Recognizing states have successfully operated under waivers, FNS increased State’s options in regards to using vendor/private staff to support improved program delivery.¹ The U.S. Department of Agriculture (USDA) regulations require states to use merit workers for specific functional areas as opposed to for-profit vendors in the administration of the Supplemental Nutrition Assistance Program when integrating call centers and application business processes.²

Options for states interested in having work performed by non-merit staff in support of their SNAP operations are listed below.

- Functions that only merit workers can perform
- Functions that private/vendor staff can perform with approval
- Functions that private/vendor staff can perform without a waiver/approval

SNAP intake and certification functions¹

Merit system personnel only

The following functions are reserved for State merit system personnel only

- Interviews
- Determining eligibility, screening for eligibility
- Handling client appeals regarding case eligibility/benefits
- Handling client complaints regarding case eligibility/benefits
- Providing application assistance
- Pursuing missing information
- Answer client questions about missing information
- Recording client information or accepting reported changes (that requires client contact)



On a case-by-case basis, FNS may approve a State's request to use vendor/private staff to interact with SNAP applicants or participants in a call or contact center.

Vendor/private staff with approval

The following functions are reserved for merit system personnel but may be performed by vendor/private staff with prior FNS approval. Approval is on case-by-case basis.

- Handling complaints (non-case specific)
 - “Wait time is too long”
 - “I want a new case worker”
- Taking requests to replace forms or letters
- Providing general information such as
 - office location
 - contact details
 - How to receive an application
- Providing general program information
- Providing locations and referrals
- Responding to request for blank applications
- Scheduling and rescheduling of appointments
- Provide the following read-only information from the system:
 - Case status
 - Application status
 - Receipt of documentation
 - Benefit amount and date
 - Case denial reason

Vendor/private staff

The following functions can be performed by non-merit system personnel and do not require FNS approval

- Data entry (that does not require client contact)
- Document scanning
- Data matching (that does not include follow-up with SNAP applicants or participants)
- Ancillary support (i.e. building security, maintenance, technology support)



Waiver versus approval requests

There is a distinction between a “full waiver” versus “approval” for vendor use related to SNAP activities. Some states have been successful in getting FNS approval, but not full waivers to use vendor staff for certain SNAP activities.

Mississippi, for example, was granted approval in a letter from FNS on February 3, 2016 to use a vendor (Xerox which became Conduent in January 2017) as follows:

“The Food and Nutrition Service (FNS) has completed its review of the proposal and is granting approval for XEROX to complete the following functions:

- 1. Handling complaints (non-case specific) such as wait time is too long, I want a new case worker, etc.;*
- 2. Taking requests to replace forms or letters;*
- 3. Providing general information such as office locations, contact details, and how to receive an application;*
- 4. Providing general program information;*
- 5. Providing locations and referrals;*
- 6. Responding to requests for blank applications; and*
- 7. Scheduling and rescheduling of appointments.*

States seem to be having greater success in obtaining FNS approvals for using non-merit staff for certain staff functions in lieu of waivers. Additionally, states struggling with urgent needs such as backlogs, high call wait times, and manual processes while awaiting the implementation of systems seem to have more success when asking for approvals. The manner in which a state asks for an approval is key in receiving authorization.

How to request a waiver/approval

To seek FNS approval, States must submit a formal request in writing to their FNS Regional Office. The State's request should include answers to the following questions (subject to change)¹:

- Identify and describe, in detail, the specific function(s) vendor/private staff will perform.
- Provide the rationale/justification for hiring vendor/private staff instead of merit system.
- How many vendor/private staff will be working on the SNAP?
- Will the use of vendor/private staff result in a reduction in the number of merit staff working on the SNAP?
- Describe, if applicable, the mechanism by which client calls will be transferred from the vendor call center to merit system personnel if case specific questions arise. Describe measures the State will take to ensure customer service (e.g. call consistency) is maintained.
- Through what organizational structure will the vendor/private staff be employed (i.e. State, temporary staffing agency, contractor, etc.)?
- How long does the State expect to use the vendor/private staff?



- What level of expertise and/or training will the vendor/private staff have?
- Describe State oversight and supervision the vendor/private staff will receive. What metrics will the State use to monitor vendor/private staff performance? If performance of the vendor/private staff is less than satisfactory, what action(s) can the State take?
- What risks to customer service or SNAP program performance does the proposed use of vendor/private staffs create?
- How will the vendor/private staff be funded?

As each State's purpose for using vendor/private staff varies, additional information will likely be requested by the Regional Office after the initial formal request is submitted by the State.

How the landscape could change

With a new administration in place and another look at the Affordable Care Act and how it is administered, FNS has already made changes to help streamline program implementation by allowing States greater flexibility in vendor/private staff use.

The administration could possibly continue to be more open to making changes in how SNAP operations can be enhanced. Conduent, as well as other vendors in the community, is working with states on how to approach FNS for a request to change existing policies in the best interest of their recipients.

How Conduent supports state government health and human services programs

As one of the largest business process services company, Conduent supports over 30 states across the nation. We provide front and back end services for state government customers, including application processing, data entry, hearing and appeals, customer service, system and technology design, development and implementation (DDI) and maintenance, as well as advisory services-to name a few-across the full spectrum of health and human services.



Comprehensive eligibility experience

We understand the wide range of government health and human services programs. By taking advantage of our in-depth experience, we can help you offer much-needed services to your citizens.

- More than 46 years of experience integrating, implementing and enhancing systems for Medicaid, CHIP and other public programs.
- 32 years of experience with Healthcare Eligibility and Enrollment services.
- 37 million people served in government health services.
- 23 million Medicaid and CHIP beneficiaries served.
- Handle over 30 million calls annually supporting over 200+ languages.
- More than 22 years of eligibility assessment and determination experience.
- Assessment and processing over 3 million eligibility applications annually.
- Over 13 years of performing outreach services, in addition to premium assessment, billing and collections.
- Over 18 million paper and digital interactions processed annually.

How we work with you to serve your constituents

Services that have recently been modified and may be performed by vendor/private staff with FNS approval:

Services	Conduent currently supports
Handling complaints (Non-case specific)	✓
Taking requests to replace forms or letters	✓
Providing general information (office location, contact details and how to receive an application)	✓
Providing general program information	✓
Provide locations and referrals	✓
Responding to requests for blank applications	✓
Scheduling and rescheduling appointments	✓
Provide the following read-only information from the system	✓
• case and application status	
• receipt of documentation	
• benefit amount and date	
• case denial reason	

Services that have historically been available to be performed by non-merit system personnel without an FNS waiver:

Services	Conduent currently supports
Data entry requiring no client contact	✓
Document scanning	✓*
Data matching (without client follow-up)	✓
Ancillary support such as building security, maintenance, technical support	✓

* Service currently performed for Medicaid eligibility support; all other services performed for SNAP eligibility support as well as other programs.

We work closely with agencies like yours to improve operational efficiency and ensure that your constituents get the services they need. By partnering with Conduent, our client agencies have achieved:

- Reduction in backlogged applications
- Improved SNAP application timeliness and error rates
- Enhanced self service options via web and mobile
- Cost savings and efficiencies

Document References

1. <https://fns-prod.azureedge.net/sites/default/files/snap/Merit-Personnel-Guidance-Call-Centers-r.pdf>
2. <https://fns-prod.azureedge.net/sites/default/files/snap/Food-And-Nutrition-Act-2008.pdf>

