

From: Nancy Hall [mailto:kanoaane@gmail.com]
Sent: Wednesday, March 31, 2010 7:13 PM
To: HUSTestimony
Subject: Testimony for April 1, 2010 Informational Briefing

LATE
Testimony

Aloha,

My name is Nancy Hall and I am an Eligibility Worker III at the Department of Human Services - Kohala Office on the Big Island. I have been employed here for 18 years.

On Monday March 29, 2010 we received a letter from Director Lillian Koller that our positions will be relocated to Hilo no later than October 1, 2010. While I am glad to still have a job on the island which I live, it will take 2 1/2 hours drive each way to report to work. We will need to arise at 4 am, leave at 5 am to be in Hilo by 7:30 am. We will reach home at 7 pm. To get 7 hours sleep we will need to go to bed by 9 pm. This pretty much eliminates any quality family time let alone community activities and commitments. One of my co-workers has taught hula to the youth in this community Tuesday and Thursday evenings for many years, will this have to stop? Why not move to Hilo you may ask? What about our homes that we own, our disabled spouses or family that are employed in our home communities? It is very difficult to find jobs on the Big Island at this time. And many of us can ill afford the costs to move due to the loss of pay due to furloughs and increases in our medical premiums.

Aside from any personal hardships and inconveniences, the appalling fact is this reorganization will severely impact our elderly, disabled and needy clients that we now serve. Many is the time when a client will come to our offices with application in hand saying "I need help to fill this out" or "I don't understand this question, can you help me?" They often need direction to resources that will assist them in other hardships they are facing. We have that knowledge.

We have mentally challenged clients, disabled clients, elderly clients who need assistance negotiating the current process. I cannot imagine them trying to negotiate a new way to apply and reapply for benefits they are entitled to and desperately need. We need the face to face contact. It is easier to understand a client of limited english proficiency when we are speaking to them face to face. Many of their english skills are passable but they need the face to face contact.

How will they receive their EBT cards? These debit-like cards are the only way they can access their benefits. We are mandated to interview and issue benefits to clients who qualify for emergency processing within 7 days. This means that by the 7th day they have to be able to buy food with an EBT card. Currently if a client cannot get to an office to replace a lost EBT card, they have the option of calling the national EBT help line and the card gets mailed to them within 7-10 days! If this were an application situation this is not

meeting participation rules.

Our work is scutinized for timeliness, accuracy and the ability for the clients who are eligible to participate in the food benefit program. These are Federal standards set forth by the US Department of Agriculture. Due to the last round of lay-offs, many of us have caseloads of 400, 500, even approaching 700!! It is impossible for us to be timely or accurate at this point. The Director says our system is antiquated, slow and there is a huge back log. SHE CAUSED THIS, NOT US!! In fact DHS has been in the top 10 states for accuracy, timeliness and participation in the past 20 years or so. Our "antiquated" system has brought millions of dollars in bonus monies to the State of Hawaii due to the hard work and dedication of the employees who do their best to maintain these standards!!

We have been told that Med Quest workers will have to learn food benefit and financial policies and BESSD (food and financial program) workers will have to learn Med Quest policies. I cannot imagine how Director Koller expects us to learn this, along with the heavy caseloads we are carrying. As new employees we all go through extensive training to learn the complicated policies and procedures of these programs. We are trained in Honolulu. The training for food benefits, financial and medical is at least 3 weeks for each program!! How can our brains handle this? We are mentally exhausted already.

Many of us feel that streamlining some of our operations would improve our system. Therefore we would be open to going "paperless" and eliminating the bulky case records and redundant paper work that we do. HOWEVER, THERE MUST BE A DHS OFFICE IN OUR RURAL COMMUNITIES. As I mentioned before it is a 2 and an half hour drive from Kohala to Hilo one way. And I cannot imagine what our Kauai and Maui County clients will do. I oppose the use of state money to pay private agencies to do our jobs.

The Director says that this reorg will save the State 8 million dollars. What is the long term savings? What is the cost in lives? It seems like a human life = zero to her. She seems to want to deny access to benefits to our most vulnerable people. The effect that this misguided plan will have will devastate our communities. You will see an increase in crime, ill health and fraud. This Director has shown that she DOES NOT CARE about her employees or the clients they serve.

Please do whatever you can to STOP this reorg until a Task Force of our peers can be convened and input can be received from the USDA as to how BEST to improve accessibility, participation, timeliness and accuracy for these programs. Our clients and employees deserve no less.

Mahalo,

Nancy C. Hall

From: g chang [mailto:palama2002@hotmail.com]
Sent: Wednesday, March 31, 2010 9:26 PM
To: HUS testimony
Subject: *****SPAM***** EPOD an RIFs

My name is Gay Chang and I have been an Eligibility Worker for almost 15 years. I believe that Director Koller's plan to "streamline" the eligibility process is a disaster waiting to happen. The fact that she chose not to include the line staff, supervisors and others who are involved in actually processing and determining eligibility on a daily basis shows that she does not care about what happens to the clients and is only concerned with cutting costs no matter what the consequences are. She wants to have private contractors do our job, with total disregard of the Federal rules. Her actions show that she is unaware of the rules and regs we must follow to correctly determine eligibility for financial, food stamps and medical benefits.

It is no secret that Arbor has already been awarded the Child Care Program, and they were unable to process applications and authorize benefits for the thousands of working clients. My unit (Nanakuli) had been processing the Child Care benefits and authorizing the benefits in a timely manner for several years. Then Arbor took over, and many clients called our office complaining about the service (or lack thereof) they were receiving. It is my understanding that Child Care is being returned to the Department in the near future. How is it that they have been awarded the Vocational Rehab contract, as well as the UFUE work program when they have proven they aren't able to fulfill the tasks they were given.

One of Koller's "consultants" happens to be married to one of the directors from Arbor. Coincidence? I think not.

Please support SB 2650 and stop the insanity!

Mahalo for the opportunity to voice my concerns on this matter, which affects 1/3 of the population of Hawaii.

LATE
Testimony

From: Daniel Pascal [mailto:danielpascal830@hotmail.com]
Sent: Wednesday, March 31, 2010 11:15 PM
To: HUSstestimony
Subject: SB2650 testimony for 4/1/10 informational briefing

Dear respected Representatives:

Thank you for allowing me to speak to this committee today.

My name is Daniel Pascal. I am an Eligibility worker for the State of Hawaii Department of Human Services.

I am here on vacation today.

I am one of the many affected by this recent round of a reduction in force.

I am representing the many people who can't come today for whatever reason and who share the same message I have.

We believe the proposed EPOD and the recent reduction in force is a mistake.

The EPOD is a system that is being forced upon the workers and upon the public in an administration's last few months in office. If this EPOD system was so important, it should have been done in increments and should have been started years ago. Why is this EPOD is important now? Why *now*? My last day of work is scheduled to be the close of business on June 30, 2010. However, the EPOD is supposedly not to be in effect until October 2010. During this three month period, who is going to do the countless amount of applications and interviews that have to be processed? What about the ongoing cases that have to be maintained? Is this work going to be contracted out? The public and the State already have the skilled and loyal people to handle the job. My unit will be cut down to one person on July 1, 2010. One person is not going to be able to handle the amount of work that will come through our doors on one day. What happens if he is sick? On a related note, what is going to happen to the 31 offices that are proposed to be shut down? Will my one eligibility worker man this whole office and the hundreds of cases that are in it?

There are numerous individuals, community agencies, and eligibility workers who are trying to be heard. We are trying to warn the administration that this EPOD is too rushed and needs to be thought out more, but our message is not being heard. All we are asking for is to please think this plan out. I believe SB 2650 will help the State step back and take a closer look at whether or not Hawaii needs an EPOD system.

The eligibility workers have always come to the rescue in times of need. When a previous child care contractor was overwhelmed and couldn't complete their work, the eligibility workers were there to save the system. We learned program policies along with our already extensive knowledge of food stamp and financial policies, then got the child care program back on track before it was contracted to another contract agency. I sincerely hope this current child care contract agency is handling things well. If they aren't, who will the work fall to then?

My reduction in force letter states that my position is being abolished because there is a lack of funding and a lack of work. If you were to come into my office, you would never see a lack of work. Each and every one of us works hard at our job, and due to the current economic situation (as we are always being reminded), I don't see a decrease in the amount of work. We are busy. We are not professionals because we have to follow policy, but we work really hard at our jobs and pour so much of ourselves into it.

The recent layoffs will close offices on Kauai and on Maui and many on Oahu. Not everybody has a phone or computer or fax machine. One person suggested that they could go to a

First to Work office and possibly do a video conference for a face to face interview. On March 25, 2010, there was a joint section meeting with the supervisors on Oahu and with the supervisors on the outer islands via video conference. Half way through the meeting, the outer island connection was lost and we could not get them back. If this was to happen during the EPOD, the client has now just lost their face to face interview which is required by Federal policy if a client wants one. What about the person in Hawaii Kai who wants a face to face interview but can't get to the proposed EPOD location site?

Our office was visited by the USDA in January 2010 to determine if the Department of Human Services is meeting its requirement of being accessible to the public. Our office was verbally commended for meeting the needs of limited English proficient people. How are non-English speakers going to be able to access and communicate with EPOD workers, especially if they want a face to face interview with an interpreter?

Yes, we are trying to save our jobs, but we are also here to ask for support to continue to help provide our HUMAN services to the public. People don't wake up saying that they want to work for the Department of Human Services for the money. They choose to work for the Department of Human Services because we believe we can make the community a better place. That we can help our fellow resident. That we can make a difference in the lives of the many.

One of the most basic human needs is to be heard. Yes, we are asking to be heard. Which is why I am here today in person asking to be heard. I live here, but if I was on the outer island, I wouldn't want to make a phone call on a pay phone because then I would have to worry about if I have enough money to make my phone call. I wouldn't want to make a cell phone call because I might run out of battery power. I don't have a fax machine. Suppose I was finally able to use a library computer after waiting to use it, which now has all my personal information on it and now I have to worry about whether my identity is safe in order to send you my email or other information. People want to be heard, that somebody is there for them. That the government is willing to help them when their lives take a drastic turn. Where is the 'human' in Department of Human Services if I am unable to let you know I am hurting and need assistance?

The many employees out of a job will affect the economy even more. The numerous people we serve who may not be able to access basic human needs, such as food, will increase. The EPOD may not be successful, then what? You will have a system that is broken with no way to fix it because your current core hard working work force will have been abolished. SB 2650 will not only give us the time to see if EPOD is needed, but may also give us time to think of any other potential possibilities of improving services.

Hawaii is an 'ohana' society. Every one of us within the Department of Human Services is dedicated in doing what we can to help the public. We are loyal, hardworking, heavily trained, flexible, compassionate people with a high degree of integrity for our work, and we sincerely wish to continue helping them in this way in the future.

Respected Representatives, I come to you today to ask for your continued support of the loyal workers for the State of Hawaii, and also for your continued support of SB 2650. This bill is good for the State of Hawaii.

My name is Daniel Pascal, and I am an eligibility worker for the State of Hawaii Department of Human Services.

Thank you.

From: Karen Muraoka [mailto:karenkmuraoka@hotmail.com]
Sent: Thursday, April 01, 2010 1:11 AM
To: HUS testimony
Subject: Informational Briefing, Thursday, April 1, 2010

Thank you for conducting this informational briefing to address concerns of DHS' March 29, 2010 letters to 228 employees that their positions will be abolished at the close of business on June 30, 2010. It is unfortunate that the vulnerable people of Hawaii require legislative intervention to insure the services they need will not fall through the cracks as the Department muddles to "rush" the implementation of the EPOD on Oahu and in Hilo in less than three (3) months.

YES, I AM IN FULL SUPPORT OF SB2650, SD1, HD1.

Millions of dollars in labor, benefits and operating costs will be quickly realized, but the "Plan" to properly transition to the EPOD by July 1, 2010 has yet to be laid out. Too many tasks need to be done in this unrealistic timeline:

1. If there's no monies, then how are we going to purchase the infrastructure (computers/software, telephone systems) coming from?
2. DHS remaining BESSD and Med-Quest staff require training on one (1) another's programs.
3. Remaining Med-Quest staff transfer to the EPOD on July 1, 2010, so when will they train?
4. Remainder of DHS staff require training to effectively assist the vulnerable community who walk into their offices needing help because these individuals have difficulty navigating through the Call Center and may not have access to telephones.
5. Administrative tasks: (a) Insure RIF'd and bumped employees a smooth transfer within the Department and/or Executive Branch, as well as proper discharge for those who have not been placed; (b) proper closure of offices, cancellation of contracts (on leases, janitorial, courier, air conditioning maintenance, security), storage/transfer of excess equipment/supplies.

The Director's idea of "meaningful consultation with affected employees" was via e-mail requesting constructive comments/recommendations; however, the only response received in less than two (2) weeks of the request was letters to inform employees that their positions have been abolished. Even if we are represented by HGEA, we are still employees of the Department.

A couple of the viable solutions presented by employees to the Director:

1. Test EPOD on an Island. After the kinks have been worked out, expand to the rest of the State.
2. Keep one (1) office on Kauai, Maui, Molokai and Lanai to insure the vulnerable community will be properly cared for. Once the other DHS offices and community agencies are properly trained, phase these Islands into the EPOD. This will also insure sufficient staff to care for the administrative tasks to properly close offices.

A viable solution on continuing to fund DHS offices would be a modest increase to the GET. It is a user tax--the more you spend, the more you pay, and visitors pay into it, too!

Raiding special funds to fund things other than its intended purpose is not right (i.e., hurricane fund: If it is not needed, then return it to the homeowners who put into it.). Raising the GET is TEMPORARY, because DHS' downsizing government is only the start; it's the guinea pig. Other departments will soon follow.

Thank you, again, for your consideration. We appreciate all of your support so DHS will do the right thing--to care for the people we serve.

Respectfully submitted,
Karen Muraoka
Kauai & State of Hawaii Resident
Member HGEA BU 03
DHS Employee

From: mary crispi [mailto:mcrispi@hotmail.com]
Sent: Thursday, April 01, 2010 6:57 AM
To: HUSTestimony
Subject: Committee on Human Services Informational Briefing 04/01/10

Thank you to Suzanne ChunOakland and John Mizuno for continuing to pursue the viability of the Director of Human Services' plan to consolidate Human Services' benefit determination and processing into two processing centers.

I am an **eligibility worker** in the South Kona Unit. We are getting phone calls hourly now from clients asking what will happen to them, and how will their needs be met in the near and longterm future? We cannot give them any answers at this time, except to parrot the vague generalities we have heard from the Director of Human Services, Lillian Koller, in her powerpoint presentation. They want specific answers as to how they will deliver their papers to DHS, and how will they get their EBT cards, certificates of eligibility for no-fault insurance, who will answer their questions when they don't understand the notices they receive.

People in remote communities without access to bus service, or perhaps once-daily bus services, want to know where they will be able to access computers and fax machines to communicate with the EPOD. Those who have difficulty reading and completing forms want to know who will help them, and who will teach them how to use (if available) the computers if applications must be completed online.

As workers, we want to know how we will verify identification of clients, how we will review with them the many forms that we currently discuss and have signed in face-to-face interviews, how we will (IF we will) answer clients' questions about the status of their cases if no case is assigned to a worker. We want to know who will be accountable to the client if the case is assigned in the morning and not completed when collected in the afternoon, and how each worker will be able to process 2-3 times as many cases as we currently do.

We are 3 months from layoffs, six months from implementation, with a 3-month gap between layoffs and implementation, yet not one concrete bit of information has trickled down to us to help us prepare the clients or ourselves for this transition.

In 1997, after the Personal Responsibility and Welfare Reform Act was passed, DHS spent months preparing for and implementing the changes dictated by the Act's passage. Staff was involved with client education and was given extensive training on the necessary changes. To date, we have no instructions on the drastic changes that will be necessary to make the EPOD work, and I believe the reason is because the Director has bought an idea, and because she does not know how her BESSD division works, does not know how the idea will become reality, but believes if she says it often enough and loud enough, someone will figure out how to make it work.

Please, if there is any way the Legislature can force her to show her action plan in detail, have her do so. If she does not have a viable plan this close to implementation, stop it from happening. The 38% of the Big Island and whatever percentage of the rest of the state that receives SNAP (food stamps) and other benefits deserves answers.

Thank you for your time and concerns.

Mary Crispi
78-7019 Mana Opelu Ln
Holualoa, HI 96725

Sent: Thursday, April 01, 2010 1:14 AM
To: HUS testimony
Subject: For Briefing on DHS Reorg on April 1st at 10:20 am

**LATE
Testimony**

Aloha Representative Mizuno & HUS Committee Members,

In advance, thank you for providing the avenue to address concerns of those affected by the

Department of Human Services Reorganization plans.

For the record, I ask that my name & privacy not be breached due to fear of retaliation or negative

repercussions by the director or her staff. I have always heard talk that this climate of fear has been

existent for many years under the current leadership of DHS. Please trust me when I say that the

concerns that I will be sharing with you are indicative of many who are too afraid to speak out.

Since I'm not a name on record, I will feel more comfortable & confident in expressing my concerns.

I am in agreement that the current system of eligibility determination can benefit from some change and

that society is moving in the direction of technological advancement, however, if these changes are

implemented at this time in it's current form, it will come at the cost of negatively affecting the most

vulnerable & the less fortunate - especially the aged, disabled, and those who have language barriers

of many different ethnicities. The majority of clients from these segments of the population want to

interact with a department employee due to their special needs and I always review their basic rights

which include the choice to have an office visit or not. As an eligibility worker, I have tried to promote

phone interviews, but only a small percentage choose the option. I'm certain that when you are a

person of need, you want the reassurance & value that only a human being can impart.

I'd like to share a few points of interest of this reorg from an employee's stand-point:

- here's how we found out about the reorg - one day in February we "heard" there was going to be a reorg - the next day, we already had a copy of the reorg. The reorg was done!! It was literally "shocking" as we had prior knowledge that a reorg was being planned. No input was requested from the employees till the week of 03/16/10 - we got an email asking for input - problem, we had to respond in less than 24 hours! If you were busy or absent, your window of opportunity closed!!
- since the day we found about the reorg back in February, employees have been "walking on eggshells" with fears of an uncertain future!
- clients were calling to see if we were going to close - they were panicking about their benefits,
- based upon years of interacting with clients, there will be great numbers who will still request a face-to-face interview ,
- regarding fraud - I always determine eligibility first & foremost, not ineligibility, but, fraud will always exist. During a face-to-face interview, you are able to pick up on individuals who have questionable household compositions & receive SNAP (more often) benefits without reporting the other income earner in the home. For example, one working parent receiving SNAP for 3 children can receive \$1000 SNAP & not report the other earner in the home. With regulations becoming more laxer & with the fraud unit nearly dismantled coupled with a bad economy, we have the conditions that encourage white collar theft,
- another consideration is that when you exclude or provide barriers to needy or hungry individuals who have no access to computers, fax or even telephone, the perfect storm is being created for more crime!
- Upon polling some of my family members, they actually think there will be more than 2 offices in our entire state base upon what they've seen on the news - the public is being misled - they need to know that there will be only one office on Oahu & one office on the Big Island, so if an 80 year old recipient or a 25 year old handicapped person wants to have a face-to-face interview because this is their choice, I guess you could say it's unfortunate that they may have to travel 20+ miles - wrong choice! How do you explain that to USDA?

I know where Representative Mizuno & many of you stand in this matter and I appreciate your support

and efforts. For the adverse effects that the vulnerable, the needy and the employees will endure, I ask

that you strongly support and expedite SB 2650 - please! Thank you kindly.

From: APersons@dhs.hawaii.gov [mailto:APersons@dhs.hawaii.gov]
Sent: Thursday, April 01, 2010 7:44 AM
To: HUS testimony
Subject: Fw: urgent matter re: the hawaiian community at large

LATE
Testimony

HONORABLE REP. JOHN MIZUNO, LEGISLATORS AND SENATORS:

i have submitted documents previously that substantiates the underhanded and deceptive practices the governor, director koller and others in dhs and dhrd have employed in an attempt to circumvent the rights of all state workers and recipients of welfare and medical benefits in the hawaiian community. the hidden agenda which is not transparent by any means has also utilized the news media in creating a false reality of the state of the economy in hawaii and especially in the dhs. why is it that the public at large is not asked to participate in sharing the burden of ms. lingles and ms. koller's inept attempt to justify their misguided agenda with scare tactics and distortion of all the facts with a tax increase and only state workers are targeted as a quick fix to the mess that lingle and koller have created in the hawaiian community.

how is it that the senators and legislators of the state of hawaii are considering permitting the streamlining of state government to pay for the oversights that the lingle and koller administrations have forced on the hawaiian community without objective analysis first. it is time for an investigative committee comprised of the experts in healthcare, business design and government to consolidate their focus in the delivery of a quality healthcare system to the hawaiian community. i feel everything was just fine not perfect but operable. now due to lingle and koller dhs and the economy of hawaii is crippled and facing disaster.

due to the advent of lingles and koller's special interest groups arriving in hawaii to monopolize the delivery of healthcare services to those that need it the most due to financial, physical or psychological hardship the reality and result is a system that is understaffed and overburdened. these newcomers to hawaii do not know the first thing about aloha or for that matter "customer service". they are not public servants like you and i but opportunists bent on taking the money first to line their already deep pockets. and sadly a lot of this money is leaving the state.

i appeal to you all to look at the common sense and simple rules that make for a thriving and vibrant hawaiian economy: a plan that is well thought out first then implemented upon all the affected participants feedback for the people and by the people.

ultimately i will wager that the private contractor elected by the lingle and koller groups is "outreach services". check this for profit company out and you will realize that the relationships are a conflict of interest. in addition ohanacare and evercare paint a nice picture but the reality is profits mandate they do the minimum in delivering quality healthcare services to the hawaiian community and additionally discredit state worker's every opportunity to justify this poorly thought out claim to streamline government. my prior submittals substantiate that the koller and lingle administration have not been interested in efficient and effective government services for the last 11 years i have been a state employee. and now koller and lingle are barking "productivity"? too little too late and haste makes waste to the hawaiian economy because of the incompetence in both the lingle and koller administrations. it would be more cost effective to eliminate all the two administrations and start all over with a leaner, meaner and enlightened administrator and administration. take a look at who really cares for us state workers and the hawaiian community. obviously it is not the newcomers to hawaii that exemplify the greed and selfishness of the lingle and koller administrations. obama is trying to save america from the bush legacy. hopefully lingle and koller do not get away with their hidden agenda.

the adverse impact that lingle and koller has had on the hawaiian economy past, present and future now rests with you. please defer and prevent the hastily and unsubstantiated value of the lingle and koller agenda before anymore damage is done to the lives and well being of the hawaiian community.

the governor and director koller are full of fluff and hot air and have absolutely no credibility, accept no accountability or feel no compassion for the economic state of hawaii due to their ill planned and selfish agenda.

----- Forwarded by Arnet Persons/bessd/DHS on 04/01/2010 06:52 AM -----

Arnet Persons/bessd/DHS

03/31/2010 08:18 AM

To senkim@capitol.hawaii.gov

cc senhanabusa@capitol.hawaii.gov, senchunoakland@capitol.hawaii.gov,
repimizuno@capitol.hawaii.gov, repmoshiro@capitol.hawaii.gov,
repcsay@capitol.hawaii.gov, <http://inouye.senate.gov>,
neil.abercrombie@mail.house.gov, <http://hirono.house.gov>,
oip@hawaii.gov

Subject urgent matter

senator kim:

i take this rare opportunity to appeal to your sense of community and reason.

whereas, the state worker's have felt the brunt of the deficit via forced furloughs, increases in health care premium costs and decreases in health care benefits, and decreases in the pay raises we all have received in the last few years. enough is enough! HELLO.

i feel it unconscionable that you would refuse to consider a GET increase because it would adversely impact small business. so what. the nature of the small business entrepreneur will automatically create a solution to that temporary hurdle. ie. pass the cost onto the consumer. oh, and then everyone in hawaii will take a share in feeling the brunt of the deficit created by lingle and koller with their idealistic and unrealistic approach to reality. which is, spend more than you have in the coffers.

lastly, the special interest groups and all the affiliated business entities that have materialized for profit only supports the theory that lingle and koller have been underhanded at minimum in their quest to streamline government so that all their friends can line their pockets with the money of hawaiian taxpayers.

show some intestinal fortitude and swim upstream like all the rest of the hawaiian community poised to suffer the most if the hidden agenda of lingle and koller is realized. this is not to say you or your colleagues should forget about all us state workers who are paying more than you are obviously since your actions are not even logical or compassionate.

by the way, executive branch departments like dhs exemplifies why they should not be in the executive branch especially when their myopic and underhanded agenda which is not transparent allows them to wreck havoc on the hawaiian economy by spending our taxpayer dollars foolishly. now we have to create the committees to scrutinize this kind of greed and mismanagement.

do you realize that major players in state and federal government have reached out to lingle and koller to offer their expertise and the lingle and koller administration is side stepping the offers for a perspective that is experienced and heartfelt. for example, the usda western region regional administrator allen ng offered to send a delegation of experienced experts to assist in the so called streamlining process cost free to taxpayers in hawaii. why is the governor and director koller not accepting? is it because they think they are without question right and everyone else is wrong?

Rep. John Mizuno

From: haipoalani@yahoo.com
Sent: Tuesday, March 30, 2010 8:32 AM
To: Rep. John Mizuno
Subject: Re: DHS - Requires Legislative Oversight and Intervention

Mahalo, John!

Hanalei

LATE
Testimony

-----Original Message-----

From: John Mizuno
To: Hanalei Aipoalani
Subject: RE: DHS - Requires Legislative Oversight and Intervention
Sent: Mar 30, 2010 8:22 AM

I have an informational briefing this Thursday at 10:20 a.m. room 329 capitol. Please attend and contact media about your concerns.

From: haipoalani@yahoo.com [haipoalani@yahoo.com]
Sent: Tuesday, March 30, 2010 12:05 AM
To: Sen. Colleen Hanabusa; Rep. Calvin Say
Cc: Linda Lingle; All Senators; All Reps
Subject: DHS - Requires Legislative Oversight and Intervention

Dear Honorable Senate President Hanabusa and House Speaker Say:

Aloha no!

Gov. Linda Lingle and Dept. of Human Services Director, Lillian Kohler, ought to be relieved of their respective roles and responsibilities immediately. Moreover, their inhumane decision to further reduce essential DHS functions and disenfranchise beneficiaries must be reversed.

Hawaii's most needy residents, namely those who can not afford the bare minimum cost of living in Hawaii, will be deprived of access to benefits. Access to government is paramount to shoring up public confidence, perception, and trust. Please do not allow partisan politics to undo decades of civil justice.

The Administration's proposed streamlining of application systems and processes is not only impersonable, it is in direct conflict with federal guidelines. If the Hawaii State Legislature does not intercede on behalf of the state, its residents, and beneficiaries, our government (our people) will be subject to:

- Class action suit(s) by beneficiaries;
- Loss of federal funds:
- Increase burden on unemployment
Benefit Insurance; and

- Potential unrest in adversely impacted communities.

On behalf of the beneficiaries of DHS medical, financial, and food stamp programs, I write to express my sincerest concerns and urge your immediate intervention.

Humbly yours,

Hanalei

Mr. Hanalei Y. Aipoalani
Resident
Community Leader of Nanakuli-Maili
Candidate - House District 44

Sent via BlackBerry by AT&T

Sent via BlackBerry by AT&T

Rep. John Mizuno

From: kuulei [kuuleikiliona@hawaii.rr.com]
Sent: Thursday, March 25, 2010 11:35 PM
To: Rep. John Mizuno
Subject: Testimony at DHS briefing 3/25/10

LATE
Testimony

Dear Rep. Mizuno.....I am providing you with some written points I made in my testimony in Hilo at the Informational Briefing on Thursday, March 25, 2010, along with some additional comments.

Keep up the good work!!!! I'm very, very thankful.

~*Ku'ulei A. Kiliona*, private citizen
and recipient of DHS & DOH services.

My background: Currently unable to work due to disabilities. Receiving social security income and Medicare for the years I did work. From DHS I am in the Quest Expanded program that helps me with (1) medical expenses which include transportation to and from medical appointments, and (2) Chore Services, a Home and Community Based Agency under DHS. Both programs are under the Quest Expanded medical plan formerly known as Medicaid.

How DHS's proposed changes would be detrimental to me:

With the extent of my disabilities it is already difficult for me to seek out the medical services that I need in order to simply stay alive. DHS's proposed changes are an extension of drastic changes already implemented by the Quest Expanded Medicaid program. Current and proposed changes place my health and well-being in jeopardy every month, every week, every day. That's no way to live.

An example: The process to request transportation to and from medical appointments has become so onerous that on two recent medical emergencies I chose to stay home at first, rather than deal with mean uncaring people on a toll free telephone number in another state who are contracted with DHS to provide transportation.

To alleviate my emergency situation last month that also required transportation, a state legislator stepped in to assist me by contacting DHS after my efforts and those of my doctor's office failed.

In last week's emergency, a social worker in Hawaii interceded for me with the same contracted transportation company known as Logisticare. Their business name is ironic, because they are anything but logical and they just don't care, because they have no commitment or connection to the communities they serve. With DHS's proposed changes, more of these kind of situations will occur, because the contractors do not have a caring connection with the people of Hawaii. Program changes under the Dept. of Human Services are becoming in-human dis-services of sanctioned abuse to a very vulnerable population.

In general how DHS's proposed changes would be detrimental

The current proposals would take the human element out of the Dept. of Human Services. In actuality, it has already started with the Quest Expanded program that began last year. Contact with another human being for help will be, and already has been, greatly diminished due to the drastic cuts in staffing at the DHS offices and more proposed changes.

In speaking out against DHS's proposed changes and the new Quest Expanded Medicaid program, it does not mean I am against improvement to the system. I am against proposals and changes that are not fiscally and morally sound, because it places Hawaii resident's lives in jeopardy, and it paves the way for lawsuits against the state that the taxpayers will have to fund.

My friend in Florida

In my oral testimony I mentioned a friend who was receiving services from DHS and DOH here in Hawaii before moving to Florida. For about 20 years this person lived and worked in Hawaii, but due to an onset of mental illness that began about 2 years ago, she was unable to work and care for herself. As a result of her illness, she was receiving services from DHS and DOH. Approximately six months ago, it was decided that she should leave Hawaii to be closer to immediate family members.

Still unable to work, but receiving social security income, it was necessary for her to apply for medical services from the state of Florida. Her encounter with Florida's down sized service methods in it's Dept. of Health & Human Services has turned her health status from bad to worse. In her vulnerable condition she is unable to fend for herself in the Florida system even with help from family members. She experiences daily suicidal ideation due to the lack of services needed for her care and the inability to dialog with a social worker about her needs. She now lives in a fetal position on her bed, crying every day, contemplating suicide.

At this point, she is also unable to return to Hawaii, because she is afraid to leave her house.

In closing, please feel free to contact me with any questions. ~*Ku'u lei*



United States Department of Agriculture
Food and Nutrition Service

Western Region

LATE
Testimony

Reply to
Attn of: Administrative Notice 05-26 August 8, 2005 FS-2-GEN

Subject: Clarification on the option to waive the face-to-face interview on a case-by-case basis

To: ALL WESTERN REGION FOOD STAMP PROGRAM COORDINATORS

This attached clarification provides general guidance for state agencies that elect to allow clients to fulfill their interview requirements without a face-to-face interview on a case-by-case basis.

Please contact your designated State Program Team, if you have any questions.

/s/

DAVID H. BAILEY, Section Chief
Program Operations and Investigations
Food Stamp Program
Western Region

Face-to-face Interview Waiver Clarification

General Guidance

In order to increase program efficiency and client access, State agencies may elect to allow clients to fulfill their interview requirement without a face-to-face interview. Face-to-face interview waivers can be offered to clients on a blanket or case-by-case basis, depending upon household circumstances. In any case, clients who request a face-to-face interview must be granted one.

Blanket Face-to-face Interview Waivers

"The State agency may opt to waive the face-to-face interview in favor of a telephone interview for all households which have no earned income and all members of the household are elderly or disabled". 7 CFR 273.2(e)(2)

The State agency can offer a face-to-face interview waiver to any or all households in which all members are elderly or disabled and have no earned income on a blanket basis and are not required to query the household to determine if they have any additional hardship that might make them eligible for a face-to-face interview waiver.

The State can apply this blanket determination in a manner that is most suitable for the State's Food Stamp Program operation. For example, the State may wish to either offer a telephone interview to eligible clients as an option or may choose the opposite, instituting telephone interviews for all clients with a hardship and then allowing the client to opt for a face-to-face interview if they desire it.

States may also choose to offer face-to-face interview waivers to other categories of households by determining eligibility for a face-to-face interview waiver on a case-by-case basis, as below.

Case-by-case

"The State agency must notify the applicant that it will waive the face-to-face interview required in paragraph (e)(1) of this section in favor of a telephone interview on a case-by-case basis because of household hardship situations as determined by the State agency. These hardship conditions include, but are not limited to: illness, transportation difficulties, care of a household member, hardships due to residency in a rural area, prolonged severe weather, or work or training hours which prevent the household from participating in an in-office interview". 7 CFR 273.2(e)(2)

The State agency has the option to define hardship in a manner that agrees with local conditions and can determine eligibility for and apply a case-by-case waiver in a manner that is most suitable for the State's Food Stamp Program operation.

For example, the State may determine that appearing at an office for an interview is a hardship for clients with earned income or for households with children under the age of 5 years. At the time that the State agency learns that a client has earned income, the State may choose to exempt any such household from face-to-face interviews, either at initial certification or at recertification. The State may

choose to either offer a telephone interview to the client as an option or may choose the opposite, instituting telephone interviews for all clients with a hardship and then allowing the client to opt for a face-to-face interview if they desire it. In effect, this case-by-case exemption could be employed as a blanket waiver for greatest efficiency of employment.

Documentation

"The State agency must document the case file to show when a waiver was granted because of a hardship". 7 CFR 273.2(e)(2)

The State can choose to document granting of a face-to-face interview waiver in the manner most appropriate to their program operations. This may include establishing a code in the eligibility determination system, through case narrative, or through some other methodology that documents eligibility for a face-to-face interview waiver in a household's case file.

Although the State agency is allowed to request verification from households of their eligibility for face-to-face interview waivers, we expect that such verification of hardship criteria, such as having a job or having children would be accomplished through normal verification procedures. State agencies may not require households to present verification in person at the food stamp office.
7 CFR 273.2(f)(5)(i)

LATE
Testimony

October 6, 2006

SUBJECT: Face-to-Face Interview Waiver Criteria

TO: All Regional Directors
Food Stamp Program

This is to advise you that we are expanding our criteria for the approval of waivers of the face-to-face interview at both initial and recertification. We also wish to note that since State agencies already may waive the face-to-face interview on an individual case basis based on a finding of hardship, we are now categorizing these waivers as waivers of the requirement that State agencies document hardship prior to utilizing alternatives to the face-to-face interview

Under our previous guidance, issued through a memorandum dated July 25, 2003, we advised the regional offices that in order to receive a waiver of the face-to-face interview at recertification, the State agency must have a payment error rate no greater than national average for the most recent fiscal year. We have reviewed the criteria for approval of such waivers, and will now approve all waiver requests, provided that the State is not in the first year of liability status.

All waivers of the face-to-face interview will be subject to the following conditions:

- The State must agree to an evaluation of the waiver;
- The State must be able to identify waiver cases in connection with the Quality Control review process;
- For initial waivers of the face-to-face interview at initial application, the waiver of the requirement to document hardship status is limited to no more than 50 percent of the caseload, selected at the discretion of the State agency. Waivers of the face-to-face interview requirement at recertification would continue to be approvable on a Statewide basis;
- The State agency must grant a face-to-face interview if the household or its authorized representative asks for one;
- After one year, the State agency must provide an interim report, including payment error rate data on households affected by the waiver, to determine if the waiver has caused any adverse impact; and
- QC payment accuracy data on (1) recertified cases under the waiver, (2) initial applications under the waiver, and (3) initial applications approved with a face to face interview. However, the State must be able to code whether a case reviewed in QC was last interviewed face-to-face or by telephone.

All Regional Directors

Page 2

This change in policy recognizes that with a much lower national average payment error rate, states may have error rates slightly above the national average that are both below historical levels and do not trigger the current liability system. We are particularly interested in getting more data on the relationship between the type of interview and payment accuracy results. If the data show not adverse affects we would anticipate expanding the scope of these waivers.

If you have any questions, please contact Larry Tropp of my staff by email or by telephone at (703) 305-2504.

/s/

Arthur T. Foley
Director
Program Development Division

**LATE
Testimony**

October 6, 2006

SUBJECT: Face-to-Face Interview Waiver Criteria

TO: All Regional Directors
Food Stamp Program

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All Regional Directors

Page 2

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If you have any questions, please contact Larry Tropp of my staff by email or by telephone at (703) 305-2504.

/s/

Arthur T. Foley
Director
Program Development Division



**LATE
Testimony**

United States
Department of
Agriculture

DEC 17 2008

Food and
Nutrition
Service

SUBJECT: SNAP – Waiver Requests to Eliminate the Interview Requirement
Altogether

3101 Park
Center Drive

TO: All Regional Directors
Supplemental Nutrition Assistance Program

Alexandria, VA
22302-1500

We recently received a request from a State agency to completely waive the requirement that the State agency conduct an interview at recertification for all households. Unlike a number of similar waivers that have allowed State agencies to utilize telephone interviews in lieu of the face-to-face interview without the need to document hardship in the household's case record, the recently requested waiver would have dispensed with interview altogether, allowing the State agency to recertify the household absent a face-to-face or a telephone interview. In lieu of an interactive interview, the State agency proposed to recertify the household based entirely on the information provided by the household in the paper application for recertification.

FNS has denied that State agency's request and as a matter of policy will not approve waivers allowing State agencies to dispense with an interactive interview altogether. FNS maintains that an interactive interview is required to ensure customer service and that eliminating the interview could compromise a State agency's ability to appropriately assist the client in completing the certification process.

The interview serves a number of key functions in the certification process. It ensures that the application is complete and that applicants who need help in understanding and completing the application receive that assistance. The interview also provides an opportunity for the eligibility worker to clarify complex income rules and deductions based on an applicant's individual circumstances and to ensure that future household circumstances are reasonably anticipated. Questionable or inconsistent information can be identified and resolved through the interview process. The interview also allows the eligibility worker to properly identify all verification requirements and provide appropriate assistance to enable the household to obtain satisfactory verification. Finally, the interview provides an opportunity to ensure that key rights and responsibilities (such as reporting changes) are understood.

In light of these considerations, FNS concludes that an interactive interview is a necessary element of the certification process, despite the potential flexibility and efficiency that might result from completely eliminating the interview. Current waivers allowing the use of a telephone interview in lieu of the face-to-face interview without the need to document hardship already provide State agencies with greater flexibility while easing the burden of the in-office face-to-face interview on households, especially those with working members.

AN EQUAL OPPORTUNITY EMPLOYER

All Regional Directors

Page 2

States may gain administrative efficiencies by tailoring and targeting interviews for certain applicants. The duration of the interview may be tailored to applicant circumstances, with less intensive interviews targeted at those applicants with more stable and straightforward circumstances. It is not necessary to discuss every response on the application form and interviews are not required to be of any specific duration. State agencies may adapt their interviews for different types of situations. Applicants who present complete applications and verification should take much less time than those who require more assistance or present more error-prone circumstances.

In its request to waive the interview requirement altogether, the State agency suggested that a telephone interview could pose a burden for those households that do not have telephone service. FNS has concluded that this is insufficient justification for waiving the interview. The number of households with no access to phone service is small, and households that do not have telephone service of their own often have access to telephone service through a neighbor or pay phone service. In the rare event in which a household has no access to phone service at all and coming to the office would pose a hardship, the State agency always retains the option of a home visit, or alternatively the household may appoint an authorized representative to act on its behalf.

FNS recently approved a waiver to allow a State agency to test the use of an interactive telephone response system at recertification in lieu of either the face-to-face or the telephone interview. The waiver was limited to households with no earned income, in which all adult members are elderly and/or disabled, and which had not experienced any change in household circumstances. This population typically has very stable circumstances and tends to be fairly non-error prone. Persons reapplying under this waiver must review and actively confirm a significant amount of information and are also given the choice of a scheduled telephone interview with an eligibility worker should they not want to use the system. FNS has approved a waiver to test this approach in a limited number of offices. As a condition of this waiver, the State agency must conduct a targeted review of cases processed using this interactive tool. The results of this analysis will allow FNS to assess the effects on program access and payment accuracy. FNS will not consider similar waiver requests until such data have been submitted and analyzed.

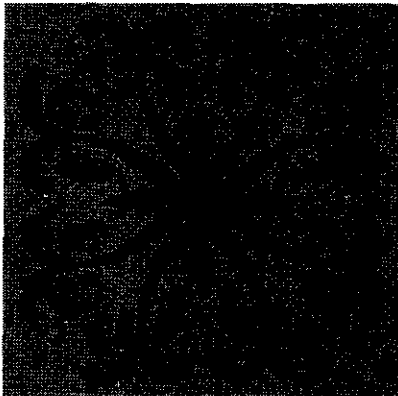
If you have any questions, please contact me at (703)305-2494 or Sandy Clark, Certification Policy Branch Chief, at (703)305-2495.

Arthur T. Foley
Arthur T. Foley
Director
Program Development Division

From: CHaili@dhs.hawaii.gov [mailto:CHaili@dhs.hawaii.gov]
Sent: Wednesday, March 31, 2010 4:16 PM
To: HUS testimony
Subject:

In all fairness everyone (all hawaii residents) will be affected (contribute to the economy crisis) equally and not be or feel "discrimanated" upon by passing SB2650 and putting a stop to the EPOD/reorganization and RIF's.

Respectfully,



Chiona Haili, EW III
Dept. of Human Services
Windward Unit
46-005 Kawa St. Ste. 307
Kaneohe, HI 96744
Phone: 233-3667
Fax: 233-3669

From: waiks99@aol.com [mailto:waiks99@aol.com]
Sent: Wednesday, March 31, 2010 4:17 PM
To: HUSstimony
Subject: Personal Testimony

I know we were only supposed to say a few words, but I have to tell someone how I feel. I'm a voter and a tax payer, and I demand that my voice finally be heard.

The proposed "EPOD" will be a financial failure and a human SERVICE failure for the following reasons:

1. the \$8 million that will supposedly be saved will go to purchasing the necessary technology that will be required for the new system
2. why are we worrying about \$8 million when the governor is willing to supply the DOE with \$92 million?
3. there are very few trainers left that will be able to cross-train all remaining workers because of the first RIF
4. once the EPOD is implemented, call wait times will be long, clients are now able to call or walk in to speak with their worker
5. Ms. Koller's suggestion of "the same worker" being on the phone as before is impossible since most of them will be let off
6. many clients feel a personal connection with their workers because the worker has been there to aid the client through many changes
7. many disabled clients, especially the homeless, do not have telephones or internet capabilities, if these clients are able to find a computer to use, many will not know how to navigate the system
8. many clients who speak English as a second language, will be lost because their previous worker knew to have a translator available during interviews, which the new EPOD workers learn through trial and error which can lead to potential late benefits
9. many clients call or come in to see their worker because they feel that there is no one else out there that cares, and if they lose this relationship many will be devastated, and since the workers deal with my psychiatric patients, suicide is a scary possibility
10. not only will benefits be delayed to clients, but the laid off workers will apply for the very benefits that they were giving to clients, this will add strain to the few workers that are left
11. morale in the new EPOD offices will be low because the new system did not take into account the front line work that occurs
12. workers often act as more than a eligibility worker, we become friends, family, a shoulder to cry on, someone to laugh with, a person who can give advice and information, and a reliable foundation which help clients mentally
13. clients will be unable to access eligibility workers during the lapse time when workers are no longer employed (June 30) and the opening of the new EPOD (Oct. 1)
14. once the system falls apart, the federal government will step in and penalize the work that is done because applications will be VERY untimely, by then, many workers may have quit because of the high stress of a job that was meant for many people to share

On a more personal note, I have only worked for DHS for about two and a half years, but I have come to love my job and many of my clients. I worry that when some of my clients find out that

I am no longer employed, they will be devastated and this would take an impact on their mental and physical health. Also, the stereotype of a state worker is incorrect. I work very hard at my job, if it were possible to work on the weekends, I would do so. I am the sole bread-winner of my household. My husband is unemployed and injured which has put a strain on our relationship. When I lose my position, I will have no income or medical benefits which I desperately need. Should I become unemployed, I will not be able to stay in the state that I love, because the cost is too high.

Jennifer H.S. Carvalho
Eligibility Worker III

Active Reported Payment Error Rates

Report Run Date:
March 18, 2010

STATE-REPORTED SUMMARY DATA

State	FY 2010	
	Cumulative Oct	Rank
FLORIDA	0.00	1
ALASKA	0.17	2
DELAWARE	0.46	3
DIST. OF COL.	0.47	4
WYOMING	0.97	5
TEXAS	1.12	6
SOUTH DAKOTA	1.21	7
NEW MEXICO	1.32	8
WISCONSIN	1.34	9
WASHINGTON	1.47	10
NORTH CAROLINA	1.66	11
PENNSYLVANIA	1.72	12
ARIZONA	1.78	13
VIRGINIA	1.85	14
KENTUCKY	1.86	15
COLORADO	1.87	16
OHIO	1.90	17
ILLINOIS	1.93	18
RHODE ISLAND	1.93	19
MISSISSIPPI	2.13	20
VIRGIN ISLANDS	2.32	21
IDAHO	2.42	22
MONTANA	2.66	23
HAWAII	2.67	24
NEBRASKA	2.89	25
UTAH	2.90	26
NEW JERSEY	3.41	27
INDIANA	3.43	28
OKLAHOMA	3.52	29
NEW YORK	3.60	30
MAINE	4.42	31
GEORGIA	4.44	32
WEST VIRGINIA	4.76	33
NEVADA	4.85	34
NEW HAMPSHIRE	4.85	35
ALABAMA	5.12	36
GUAM	5.44	37
LOUISIANA	5.83	38
TENNESSEE	5.95	39
KANSAS	6.07	40
IOWA	6.28	41
VERMONT	6.46	42
MINNESOTA	6.52	43
ARKANSAS	6.76	44
CONNECTICUT	6.81	45
SOUTH CAROLINA	6.85	46
MASSACHUSETTS	7.02	47
OREGON	7.35	48
CALIFORNIA	7.38	49
MISSOURI	7.63	50
NORTH DAKOTA	7.77	51
MARYLAND	7.82	52
MICHIGAN	7.95	53

Report Run Date:
March 18, 2010

State	FY 2009	FY 2010	Change
	Cumulative Oct - Sep /2	Cumulative Oct	
TEXAS	6.76	1.12	-5.64
ILLINOIS	5.89	1.93	-3.96
VIRGINIA	5.50	1.85	-3.65
INDIANA	7.02	3.43	-3.59
ALASKA	3.71	0.17	-3.54
NEW MEXICO	4.83	1.32	-3.51
ARIZONA	5.16	1.78	-3.38
DIST. OF COL.	3.29	0.47	-2.82
PENNSYLVANIA	4.33	1.72	-2.61
KENTUCKY	4.27	1.86	-2.41
WYOMING	3.23	0.97	-2.26
RHODE ISLAND	3.60	1.93	-1.67
NEW YORK	5.22	3.60	-1.62
MONTANA	3.69	2.66	-1.03
NORTH CAROLINA	2.45	1.66	-0.79
COLORADO	2.65	1.87	-0.78
UTAH	3.57	2.90	-0.67
FLORIDA	0.66	0.00	-0.66
MISSISSIPPI	2.72	2.13	-0.59
WEST VIRGINIA	5.26	4.76	-0.50
DELAWARE	0.89	0.46	-0.43
WASHINGTON	1.88	1.47	-0.41
VIRGIN ISLANDS	2.67	2.32	-0.35
HAWAII	3.02	2.67	-0.35
IDAHO	2.66	2.42	-0.24
OKLAHOMA	3.71	3.52	-0.19
OHIO	2.02	1.90	-0.12
IOWA	6.31	6.28	-0.03
WISCONSIN	1.09	1.34	0.25
SOUTH DAKOTA	0.93	1.21	0.28
NEW JERSEY	3.11	3.41	0.30
MARYLAND	7.25	7.82	0.57
NEVADA	3.91	4.85	0.94
LOUISIANA	4.74	5.83	1.09
GUAM	4.24	5.44	1.20
VERMONT	5.25	6.46	1.21
NEBRASKA	1.47	2.89	1.42
MICHIGAN	6.52	7.95	1.43
ALABAMA	3.51	5.12	1.61
NEW HAMPSHIRE	3.06	4.85	1.79
KANSAS	4.27	6.07	1.80
CONNECTICUT	4.99	6.81	1.82
ARKANSAS	4.65	6.76	2.11
SOUTH CAROLINA	4.37	6.85	2.48
MISSOURI	5.14	7.63	2.49
MAINE	1.86	4.42	2.56
MINNESOTA	3.90	6.52	2.62
GEORGIA	1.70	4.44	2.74
TENNESSEE	2.94	5.95	3.01
MASSACHUSETTS	3.92	7.02	3.10
CALIFORNIA	3.92	7.38	3.46
OREGON	3.77	7.35	3.58
NORTH DAKOTA	3.42	7.77	4.35

Active Reported Payment Error Rates

Report Run Date:
August 13, 2009

STATE-REPORTED SUMMARY DATA

State	FY 2009 Cumulative Oct - Mar	Rank
DELAWARE	0.65	1
FLORIDA	0.84	2
SOUTH DAKOTA	1.31	3
WISCONSIN	1.39	4
NEBRASKA	1.65	5
GEORGIA	1.69	6
MAINE	1.92	7
OHIO	2.01	8
NORTH CAROLINA	2.20	9
WASHINGTON	2.47	10
DIST. OF COL.	2.86	11
COLORADO	2.87	12
NORTH DAKOTA	2.88	13
NEVADA	2.88	14
TENNESSEE	2.98	15
MISSISSIPPI	2.99	16
HAWAII	3.13	17
MONTANA	3.17	18
IDAHO	3.21	19
MASSACHUSETTS	3.23	20
NEW HAMPSHIRE	3.30	21
KENTUCKY	3.97	22
PENNSYLVANIA	4.07	23
CALIFORNIA	4.09	24
NEW JERSEY	4.15	25
WYOMING	4.15	26
VIRGIN ISLANDS	4.24	27
OKLAHOMA	4.28	28
KANSAS	4.33	29
ALABAMA	4.36	30
VERMONT	4.51	31
CONNECTICUT	4.76	32
ARIZONA	4.97	33
ARKANSAS	5.01	34
OREGON	5.06	35
NEW YORK	5.11	36
WEST VIRGINIA	5.11	37
RHODE ISLAND	5.14	38
MINNESOTA	5.18	39
VIRGINIA	5.75	40
MISSOURI	5.75	41
ALASKA	5.78	42
UTAH	5.84	43
GUAM	5.84	44
NEW MEXICO	5.85	45
ILLINOIS	6.02	46
SOUTH CAROLINA	6.03	47
LOUISIANA	6.07	48
MICHIGAN	6.10	49
MARYLAND	7.36	50
IOWA	7.67	51
INDIANA	9.39	52
TEXAS	12.58	53

Report Run Date:
August 13, 2009

State	FY 2008 Cumulative Oct - Sep /2	FY 2009 Cumulative Oct - Mar	Change
MAINE	8.05	1.92	-6.13
WISCONSIN	6.93	1.39	-5.54
DELAWARE	5.47	0.65	-4.82
GUAM	9.36	5.84	-3.52
CONNECTICUT	8.00	4.76	-3.24
DIST. OF COL.	6.04	2.86	-3.18
NORTH DAKOTA	5.62	2.88	-2.74
OHIO	4.18	2.01	-2.17
WEST VIRGINIA	7.16	5.11	-2.05
TENNESSEE	4.58	2.98	-1.60
ALASKA	7.38	5.78	-1.60
OKLAHOMA	5.66	4.28	-1.38
NEVADA	4.22	2.88	-1.34
WASHINGTON	3.81	2.47	-1.34
KENTUCKY	5.24	3.97	-1.27
MASSACHUSETTS	4.40	3.23	-1.17
MINNESOTA	6.21	5.18	-1.03
ARKANSAS	6.03	5.01	-1.02
NEBRASKA	2.65	1.65	-1.00
VERMONT	5.35	4.51	-0.84
NEW HAMPSHIRE	4.02	3.30	-0.72
CALIFORNIA	4.75	4.09	-0.66
NEW JERSEY	4.76	4.15	-0.61
GEORGIA	2.27	1.69	-0.58
LOUISIANA	6.65	6.07	-0.58
COLORADO	3.41	2.87	-0.54
NEW MEXICO	6.28	5.85	-0.43
NORTH CAROLINA	2.60	2.20	-0.40
MONTANA	3.35	3.17	-0.18
OREGON	5.22	5.06	-0.16
SOUTH CAROLINA	6.10	6.03	-0.07
FLORIDA	0.83	0.84	0.01
IOWA	7.63	7.67	0.04
HAWAII	2.99	3.13	0.14
IDAHO	3.07	3.21	0.14
VIRGINIA	5.59	5.75	0.16
ALABAMA	4.12	4.36	0.24
ARIZONA	4.73	4.97	0.24
SOUTH DAKOTA	1.00	1.31	0.31
MICHIGAN	5.72	6.10	0.38
MISSOURI	5.37	5.75	0.38
MISSISSIPPI	2.55	2.99	0.44
KANSAS	3.80	4.33	0.53
NEW YORK	4.37	5.11	0.74
MARYLAND	6.60	7.36	0.76
VIRGIN ISLANDS	3.22	4.24	1.02
PENNSYLVANIA	2.82	4.07	1.25
RHODE ISLAND	3.85	5.14	1.29
WYOMING	2.62	4.15	1.53
ILLINOIS	4.22	6.02	1.80
UTAH	3.89	5.84	1.95
INDIANA	7.24	9.39	2.15
TEXAS	7.03	12.58	5.55

Active Reported Payment Error Rates

Report Run Date:
August 13, 2009

STATE-REPORTED SUMMARY DATA

State	FY 2009	
	Cumulative Oct - Mar	Rank
DELAWARE	0.65	1
FLORIDA	0.84	2
SOUTH DAKOTA	1.31	3
WISCONSIN	1.39	4
NEBRASKA	1.65	5
GEORGIA	1.69	6
MAINE	1.92	7
OHIO	2.01	8
NORTH CAROLINA	2.20	9
WASHINGTON	2.47	10
DIST. OF COL.	2.86	11
COLORADO	2.87	12
NORTH DAKOTA	2.88	13
NEVADA	2.88	14
TENNESSEE	2.98	15
MISSISSIPPI	2.99	16
HAWAII	3.13	17
MONTANA	3.17	18
IDAHO	3.21	19
MASSACHUSETTS	3.23	20
NEW HAMPSHIRE	3.30	21
KENTUCKY	3.97	22
PENNSYLVANIA	4.07	23
CALIFORNIA	4.09	24
NEW JERSEY	4.15	25
WYOMING	4.15	26
VIRGIN ISLANDS	4.24	27
OKLAHOMA	4.28	28
KANSAS	4.33	29
ALABAMA	4.36	30
VERMONT	4.51	31
CONNECTICUT	4.76	32
ARIZONA	4.97	33
ARKANSAS	5.01	34
OREGON	5.06	35
NEW YORK	5.11	36
WEST VIRGINIA	5.11	37
RHODE ISLAND	5.14	38
MINNESOTA	5.18	39
VIRGINIA	5.75	40
MISSOURI	5.75	41
ALASKA	5.78	42
UTAH	5.84	43
GUAM	5.84	44
NEW MEXICO	5.85	45
ILLINOIS	6.02	46
SOUTH CAROLINA	6.03	47
LOUISIANA	6.07	48
MICHIGAN	6.10	49
MARYLAND	7.36	50
IOWA	7.67	51
INDIANA	9.39	52
TEXAS	12.58	53

Report Run Date:
August 13, 2009

State	FY 2008		FY 2009		Change
	Cumulative Oct - Sep /2	Cumulative Oct - Mar	Cumulative Oct - Mar		
< MAINE	8.05	1.92	1.92	-6.13	
WISCONSIN	6.93	1.39	1.39	-5.54	
DELAWARE	5.47	0.65	0.65	-4.82	
GUAM	9.36	5.84	5.84	-3.52	
CONNECTICUT	8.00	4.76	4.76	-3.24	
DIST. OF COL.	6.04	2.86	2.86	-3.18	
NORTH DAKOTA	5.62	2.88	2.88	-2.74	
OHIO	4.18	2.01	2.01	-2.17	
WEST VIRGINIA	7.16	5.11	5.11	-2.05	
TENNESSEE	4.58	2.98	2.98	-1.60	
ALASKA	7.38	5.78	5.78	-1.60	
OKLAHOMA	5.66	4.28	4.28	-1.38	
NEVADA	4.22	2.88	2.88	-1.34	
WASHINGTON	3.81	2.47	2.47	-1.34	
KENTUCKY	5.24	3.97	3.97	-1.27	
MASSACHUSETTS	4.40	3.23	3.23	-1.17	
MINNESOTA	6.21	5.18	5.18	-1.03	
ARKANSAS	6.03	5.01	5.01	-1.02	
NEBRASKA	2.65	1.65	1.65	-1.00	
VERMONT	5.35	4.51	4.51	-0.84	
NEW HAMPSHIRE	4.02	3.30	3.30	-0.72	
CALIFORNIA	4.75	4.09	4.09	-0.66	
NEW JERSEY	4.76	4.15	4.15	-0.61	
GEORGIA	2.27	1.69	1.69	-0.58	
LOUISIANA	6.65	6.07	6.07	-0.58	
COLORADO	3.41	2.87	2.87	-0.54	
NEW MEXICO	6.28	5.85	5.85	-0.43	
NORTH CAROLINA	2.60	2.20	2.20	-0.40	
MONTANA	3.35	3.17	3.17	-0.18	
OREGON	5.22	5.06	5.06	-0.16	
SOUTH CAROLINA	6.10	6.03	6.03	-0.07	
FLORIDA	0.83	0.84	0.84	0.01	
IOWA	7.63	7.67	7.67	0.04	
HAWAII	2.99	3.13	3.13	0.14	
IDAHO	3.07	3.21	3.21	0.14	
VIRGINIA	5.59	5.75	5.75	0.16	
ALABAMA	4.12	4.36	4.36	0.24	
ARIZONA	4.73	4.97	4.97	0.24	
SOUTH DAKOTA	1.00	1.31	1.31	0.31	
MICHIGAN	5.72	6.10	6.10	0.38	
MISSOURI	5.37	5.75	5.75	0.38	
MISSISSIPPI	2.55	2.99	2.99	0.44	
KANSAS	3.80	4.33	4.33	0.53	
NEW YORK	4.37	5.11	5.11	0.74	
MARYLAND	6.60	7.36	7.36	0.76	
VIRGIN ISLANDS	3.22	4.24	4.24	1.02	
PENNSYLVANIA	2.82	4.07	4.07	1.25	
RHODE ISLAND	3.85	5.14	5.14	1.29	
WYOMING	2.62	4.15	4.15	1.53	
ILLINOIS	4.22	6.02	6.02	1.80	
UTAH	3.89	5.84	5.84	1.95	
INDIANA	7.24	9.39	9.39	2.15	
TEXAS	7.03	12.58	12.58	5.55	

Active Reported Payment Error Rates

Report Run Date:
February 4, 2009

STATE-REPORTED SUMMARY DATA

State	FY 2008 Cumulative Oct-Sept*	Rank
FLORIDA	0.83	1
SOUTH DAKOTA	1.00	2
GEORGIA	2.27	3
MISSISSIPPI	2.55	4
NORTH CAROLINA	2.60	5
WYOMING	2.62	6
NEBRASKA	2.65	7
PENNSYLVANIA	2.82	8
HAWAII	2.99	9
IDAHO	3.07	10
VIRGIN ISLANDS	3.22	11
MONTANA	3.35	12
COLORADO	3.41	13
KANSAS	3.80	14
WASHINGTON	3.81	15
RHODE ISLAND	3.85	16
UTAH	3.89	17
NEW HAMPSHIRE	4.02	18
ALABAMA	4.12	19
OHIO	4.18	20
ILLINOIS	4.22	21
NEVADA	4.22	22
NEW YORK	4.37	23
MASSACHUSETTS	4.40	24
TENNESSEE	4.58	25
ARIZONA	4.73	26
CALIFORNIA	4.75	27
NEW JERSEY	4.76	28
OREGON	5.22	29
KENTUCKY	5.24	30
VERMONT	5.35	31
MISSOURI	5.37	32
DELAWARE	5.47	33
VIRGINIA	5.59	34
NORTH DAKOTA	5.62	35
OKLAHOMA	5.66	36
MICHIGAN	5.72	37
ARKANSAS	6.03	38
DIST. OF COL.	6.04	39
SOUTH CAROLINA	6.10	40
MINNESOTA	6.21	41
NEW MEXICO	6.28	42
MARYLAND	6.60	43
LOUISIANA	6.65	44
WISCONSIN	6.93	45
TEXAS	7.03	46
WEST VIRGINIA	7.16	47
INDIANA	7.24	48
ALASKA	7.38	49
IOWA	7.63	50
CONNECTICUT	8.00	51
MAINE	8.05	52
GUAM	9.36	53

Report Run Date:
February 4, 2009

State	FY 2007 Cumulative Oct - Sep /2	FY 2008 Cumulative Oct-Sept*	Change
< GEORGIA	7.99	2.27	-5.72
OHIO	8.33	4.18	-4.15
< WYOMING	6.42	2.62	-3.80
DELAWARE	9.26	5.47	-3.79
COLORADO	6.83	3.41	-3.42
MONTANA	6.44	3.35	-3.09
MICHIGAN	8.31	5.72	-2.59
FLORIDA	3.35	0.83	-2.52
DIST. OF COL.	8.43	6.04	-2.39
MAINE	10.17	8.05	-2.12
NEW HAMPSHIRE	5.99	4.02	-1.97
WEST VIRGINIA	9.11	7.16	-1.95
IDAHO	4.45	3.07	-1.38
RHODE ISLAND	5.17	3.85	-1.32
NEW MEXICO	7.35	6.28	-1.07
NEW YORK	5.31	4.37	-0.94
ILLINOIS	5.13	4.22	-0.91
ARKANSAS	6.94	6.03	-0.91
VIRGINIA	6.34	5.59	-0.75
VERMONT	6.01	5.35	-0.66
ALABAMA	4.72	4.12	-0.60
MARYLAND	7.01	6.60	-0.41
OKLAHOMA	6.05	5.66	-0.39
SOUTH DAKOTA	1.26	1.00	-0.26
LOUISIANA	6.90	6.65	-0.25
TENNESSEE	4.82	4.58	-0.24
MINNESOTA	6.32	6.21	-0.11
MISSISSIPPI	2.57	2.55	-0.02
ARIZONA	4.66	4.73	0.07
MASSACHUSETTS	4.22	4.40	0.18
VIRGIN ISLANDS	3.03	3.22	0.19
OREGON	5.01	5.22	0.21
KANSAS	3.54	3.80	0.26
UTAH	3.62	3.89	0.27
CALIFORNIA	4.46	4.75	0.29
INDIANA	6.84	7.24	0.40
HAWAII	2.58	2.99	0.41
NORTH CAROLINA	2.18	2.60	0.42
PENNSYLVANIA	2.31	2.82	0.51
NEVADA	3.68	4.22	0.54
KENTUCKY	4.67	5.24	0.57
TEXAS	6.30	7.03	0.73
NEW JERSEY	4.00	4.76	0.76
SOUTH CAROLINA	5.23	6.10	0.87
WASHINGTON	2.89	3.81	0.92
WISCONSIN	5.95	6.93	0.98
NEBRASKA	1.64	2.65	1.01
IOWA	6.53	7.63	1.10
CONNECTICUT	6.32	8.00	1.68
NORTH DAKOTA	3.24	5.62	2.38
GUAM	6.93	9.36	2.43
MISSOURI	1.98	5.37	3.39
ALASKA	3.94	7.38	3.44

Active Reported Payment Error Rates

Report Run Date:
February 1, 2008

STATE-REPORTED SUMMARY DATA

State	FY 2007 Cumulative Oct-Sept.*	Rank
SOUTH DAKOTA	1.26	1
NEBRASKA	1.64	2
MISSOURI	1.98	3
NORTH CAROLINA	2.18	4
PENNSYLVANIA	2.31	5
MISSISSIPPI	2.57	6
HAWAII	2.58	7
WASHINGTON	2.89	8
VIRGIN ISLANDS	3.03	9
NORTH DAKOTA	3.24	10
FLORIDA	3.35	11
KANSAS	3.54	12
UTAH	3.62	13
NEVADA	3.68	14
ALASKA	3.94	15
NEW JERSEY	4.00	16
MASSACHUSETTS	4.22	17
IDAHO	4.45	18
CALIFORNIA	4.46	19
ARIZONA	4.66	20
KENTUCKY	4.67	21
ALABAMA	4.72	22
TENNESSEE	4.82	23
OREGON	5.01	24
ILLINOIS	5.13	25
RHODE ISLAND	5.17	26
SOUTH CAROLINA	5.23	27
NEW YORK	5.31	28
WISCONSIN	5.95	29
NEW HAMPSHIRE	5.99	30
VERMONT	6.01	31
OKLAHOMA	6.05	32
TEXAS	6.30	33
CONNECTICUT	6.32	34
MINNESOTA	6.32	35
VIRGINIA	6.34	36
WYOMING	6.42	37
MONTANA	6.44	38
IOWA	6.53	39
COLORADO	6.83	40
INDIANA	6.84	41
LOUISIANA	6.90	42
GUAM	6.93	43
ARKANSAS	6.94	44
MARYLAND	7.01	45
NEW MEXICO	7.35	46
GEORGIA	7.99	47
MICHIGAN	8.31	48
OHIO	8.33	49
DIST. OF COL.	8.43	50
WEST VIRGINIA	9.11	51
DELAWARE	9.26	52
MAINE	10.17	53

Report Run Date:
February 1, 2008

State	FY 2006 Cumulative Oct - Sep /2	FY 2007 Cumulative Oct-Sept.*	Change
FLORIDA	8.33	3.35	-4.98
ARIZONA	8.15	4.66	-3.49
KANSAS	6.30	3.54	-2.76
ALASKA	5.74	3.94	-1.80
CALIFORNIA	6.05	4.46	-1.59
NEBRASKA	3.15	1.64	-1.51
OKLAHOMA	7.10	6.05	-1.05
MINNESOTA	7.37	6.32	-1.05
PENNSYLVANIA	3.32	2.31	-1.01
KENTUCKY	5.66	4.67	-0.99
SOUTH CAROLINA	6.11	5.23	-0.88
ILLINOIS	5.84	5.13	-0.71
HAWAII	3.29	2.58	-0.71
NORTH CAROLINA	2.75	2.18	-0.57
SOUTH DAKOTA	1.79	1.26	-0.53
TENNESSEE	5.30	4.82	-0.48
UTAH	4.07	3.62	-0.45
NORTH DAKOTA	3.60	3.24	-0.36
DIST. OF COL.	8.75	8.43	-0.32
VIRGINIA	6.63	6.34	-0.29
GUAM	7.19	6.93	-0.26
IDAHO	4.65	4.45	-0.20
MISSOURI	2.15	1.98	-0.17
ARKANSAS	7.09	6.94	-0.15
WISCONSIN	6.05	5.95	-0.10
OREGON	5.10	5.01	-0.09
TEXAS	6.36	6.30	-0.06
NEW HAMPSHIRE	6.04	5.99	-0.05
NEVADA	3.63	3.68	0.05
MISSISSIPPI	2.51	2.57	0.06
MONTANA	6.34	6.44	0.10
IOWA	6.38	6.53	0.15
COLORADO	6.60	6.83	0.23
INDIANA	6.49	6.84	0.35
WASHINGTON	2.54	2.89	0.35
NEW JERSEY	3.28	4.00	0.72
NEW MEXICO	6.62	7.35	0.73
MASSACHUSETTS	3.40	4.22	0.82
MAINE	9.28	10.17	0.89
VERMONT	5.05	6.01	0.96
GEORGIA	7.01	7.99	0.98
NEW YORK	4.31	5.31	1.00
MICHIGAN	7.28	8.31	1.03
WYOMING	5.39	6.42	1.03
CONNECTICUT	5.29	6.32	1.03
VIRGIN ISLANDS	1.80	3.03	1.23
ALABAMA	3.39	4.72	1.33
DELAWARE	7.92	9.26	1.34
RHODE ISLAND	3.71	5.17	1.46
OHIO	6.85	8.33	1.48
MARYLAND	5.49	7.01	1.52
WEST VIRGINIA	7.07	9.11	2.04
LOUISIANA		Katrina	n/a

Active Reported Payment Error Rates

Report Run Date:
February 1, 2008

STATE-REPORTED SUMMARY DATA

State	FY 2007	
	Cumulative Oct-Sept.*	Rank
SOUTH DAKOTA	1.26	1
NEBRASKA	1.64	2
MISSOURI	1.98	3
NORTH CAROLINA	2.18	4
PENNSYLVANIA	2.31	5
MISSISSIPPI	2.57	6
HAWAII	2.58	7
WASHINGTON	2.89	8
VIRGIN ISLANDS	3.03	9
NORTH DAKOTA	3.24	10
FLORIDA	3.35	11
KANSAS	3.54	12
UTAH	3.62	13
NEVADA	3.68	14
ALASKA	3.94	15
NEW JERSEY	4.00	16
MASSACHUSETTS	4.22	17
IDAHO	4.45	18
CALIFORNIA	4.46	19
ARIZONA	4.66	20
KENTUCKY	4.67	21
ALABAMA	4.72	22
TENNESSEE	4.82	23
OREGON	5.01	24
ILLINOIS	5.13	25
RHODE ISLAND	5.17	26
SOUTH CAROLINA	5.23	27
NEW YORK	5.31	28
WISCONSIN	5.95	29
NEW HAMPSHIRE	5.99	30
VERMONT	6.01	31
OKLAHOMA	6.05	32
TEXAS	6.30	33
CONNECTICUT	6.32	34
MINNESOTA	6.32	35
VIRGINIA	6.34	36
WYOMING	6.42	37
MONTANA	6.44	38
IOWA	6.53	39
COLORADO	6.83	40
INDIANA	6.84	41
LOUISIANA	6.90	42
GUAM	6.93	43
ARKANSAS	6.94	44
MARYLAND	7.01	45
NEW MEXICO	7.35	46
GEORGIA	7.99	47
MICHIGAN	8.31	48
OHIO	8.33	49
DIST. OF COL.	8.43	50
WEST VIRGINIA	9.11	51
DELAWARE	9.26	52
MAINE	10.17	53

Report Run Date:
February 1, 2008

State	FY 2006	FY 2007	Change
	Cumulative Oct - Sep /2	Cumulative Oct-Sept.*	
FLORIDA	8.33	3.35	-4.98
ARIZONA	8.15	4.66	-3.49
KANSAS	6.30	3.54	-2.76
ALASKA	5.74	3.94	-1.80
CALIFORNIA	6.05	4.46	-1.59
NEBRASKA	3.15	1.64	-1.51
OKLAHOMA	7.10	6.05	-1.05
MINNESOTA	7.37	6.32	-1.05
PENNSYLVANIA	3.32	2.31	-1.01
KENTUCKY	5.66	4.67	-0.99
SOUTH CAROLINA	6.11	5.23	-0.88
ILLINOIS	5.84	5.13	-0.71
HAWAII	3.29	2.58	-0.71
NORTH CAROLINA	2.75	2.18	-0.57
SOUTH DAKOTA	1.79	1.26	-0.53
TENNESSEE	5.30	4.82	-0.48
UTAH	4.07	3.62	-0.45
NORTH DAKOTA	3.60	3.24	-0.36
DIST. OF COL.	8.75	8.43	-0.32
VIRGINIA	6.63	6.34	-0.29
GUAM	7.19	6.93	-0.26
IDAHO	4.65	4.45	-0.20
MISSOURI	2.15	1.98	-0.17
ARKANSAS	7.09	6.94	-0.15
WISCONSIN	6.05	5.95	-0.10
OREGON	5.10	5.01	-0.09
TEXAS	6.36	6.30	-0.06
NEW HAMPSHIRE	6.04	5.99	-0.05
NEVADA	3.63	3.68	0.05
MISSISSIPPI	2.51	2.57	0.06
MONTANA	6.34	6.44	0.10
IOWA	6.38	6.53	0.15
COLORADO	6.60	6.83	0.23
INDIANA	6.49	6.84	0.35
WASHINGTON	2.54	2.89	0.35
NEW JERSEY	3.28	4.00	0.72
NEW MEXICO	6.62	7.35	0.73
MASSACHUSETTS	3.40	4.22	0.82
MAINE	9.28	10.17	0.89
VERMONT	5.05	6.01	0.96
GEORGIA	7.01	7.99	0.98
NEW YORK	4.31	5.31	1.00
MICHIGAN	7.28	8.31	1.03
WYOMING	5.39	6.42	1.03
CONNECTICUT	5.29	6.32	1.03
VIRGIN ISLANDS	1.80	3.03	1.23
ALABAMA	3.39	4.72	1.33
DELAWARE	7.92	9.26	1.34
RHODE ISLAND	3.71	5.17	1.46
OHIO	6.85	8.33	1.48
MARYLAND	5.49	7.01	1.52
WEST VIRGINIA	7.07	9.11	2.04
LOUISIANA		Katrina	n/a

Active Reported Payment Error Rates

Report Run Date:
August 22, 2007

STATE-REPORTED SUMMARY DATA

State	FY 2007 Cumulative Oct-Apr.*	Rank
MISSOURI	0.95	1
SOUTH DAKOTA	1.48	2
NEBRASKA	1.57	3
NORTH CAROLINA	2.03	4
PENNSYLVANIA	2.09	5
HAWAII	2.51	6
VIRGIN ISLANDS	2.631	7
NORTH DAKOTA	2.632	8
UTAH	2.84	9
MISSISSIPPI	3.05	10
WASHINGTON	3.29	11
NEVADA	3.31	12
KENTUCKY	3.37	13
ALASKA	3.43	14
NEW JERSEY	3.45	15
MASSACHUSETTS	3.59	16
IOWA	4.18	17
IDAHO	4.33	18
CALIFORNIA	4.37	19
NEW YORK	4.72	20
TENNESSEE	4.74	21
KANSAS	4.82	22
OREGON	5.11	23
ALABAMA	5.31	24
FLORIDA	5.40	25
VERMONT	5.42	26
OKLAHOMA	5.43	27
SOUTH CAROLINA	5.45	28
NEW HAMPSHIRE	5.47	29
ARIZONA	5.51	30
ILLINOIS	5.53	31
RHODE ISLAND	5.75	32
TEXAS	5.84	33
WISCONSIN	6.00	34
MARYLAND	6.28	35
CONNECTICUT	6.32	36
VIRGINIA	6.32	37
LOUISIANA	6.86	38
COLORADO	6.89	39
GEORGIA	6.97	40
INDIANA	7.14	41
MONTANA	7.47	42
NEW MEXICO	7.61	43
GUAM	7.62	44
MINNESOTA	7.64	45
OHIO	7.92	46
ARKANSAS	7.96	47
DIST. OF COL.	8.02	48
WYOMING	8.60	49
DELAWARE	8.65	50
MICHIGAN	8.76	51
WEST VIRGINIA	8.77	52
MAINE	10.67	53

Report Run Date:
August 22, 2007

State	FY 2006 Cumulative Oct - Sep /2	FY 2007 Cumulative Oct-Apr.*	Change
FLORIDA	8.33	5.40	-2.93
ARIZONA	8.15	5.51	-2.64
ALASKA	5.74	3.43	-2.31
KENTUCKY	5.66	3.37	-2.29
IOWA	6.38	4.18	-2.20
CALIFORNIA	6.05	4.37	-1.68
OKLAHOMA	7.10	5.43	-1.67
NEBRASKA	3.15	1.57	-1.58
KANSAS	6.30	4.82	-1.48
UTAH	4.07	2.84	-1.23
PENNSYLVANIA	3.32	2.09	-1.23
MISSOURI	2.15	0.95	-1.20
NORTH DAKOTA	3.60	2.63	-0.97
HAWAII	3.29	2.51	-0.78
DIST. OF COL.	8.75	8.02	-0.73
NORTH CAROLINA	2.75	2.03	-0.72
SOUTH CAROLINA	6.11	5.45	-0.66
NEW HAMPSHIRE	6.04	5.47	-0.57
TENNESSEE	5.30	4.74	-0.56
TEXAS	6.36	5.84	-0.52
IDAHO	4.65	4.33	-0.32
NEVADA	3.63	3.31	-0.32
SOUTH DAKOTA	1.79	1.48	-0.31
VIRGINIA	6.63	6.32	-0.31
ILLINOIS	5.84	5.53	-0.31
WISCONSIN	6.05	6.00	-0.05
GEORGIA	7.01	6.97	-0.04
OREGON	5.10	5.11	0.01
NEW JERSEY	3.28	3.45	0.17
MASSACHUSETTS	3.40	3.59	0.19
MINNESOTA	7.37	7.64	0.27
COLORADO	6.60	6.89	0.29
VERMONT	5.05	5.42	0.37
NEW YORK	4.31	4.72	0.41
GUAM	7.19	7.62	0.43
MISSISSIPPI	2.51	3.05	0.54
INDIANA	6.49	7.14	0.65
DELAWARE	7.92	8.65	0.73
WASHINGTON	2.54	3.29	0.75
MARYLAND	5.49	6.28	0.79
VIRGIN ISLANDS	1.80	2.63	0.83
ARKANSAS	7.09	7.96	0.87
NEW MEXICO	6.62	7.61	0.99
CONNECTICUT	5.29	6.32	1.03
OHIO	6.85	7.92	1.07
MONTANA	6.34	7.47	1.13
MAINE	9.28	10.67	1.39
MICHIGAN	7.28	8.76	1.48
WEST VIRGINIA	7.07	8.77	1.70
ALABAMA	3.39	5.31	1.92
RHODE ISLAND	3.71	5.75	2.04
WYOMING	5.39	8.60	3.21
LOUISIANA		Katrina	n/a

Florida implemented Florida Hoces in July 2006
 Planning started

Active Reported Payment Error Rates

Report Run Date: STATE-REPORTED SUMMARY DATA
 February 1, 2007

State	FY 2006 Cumulative Oct.-Sept.*	Rank
SOUTH DAKOTA	1.79	1
VIRGIN ISLANDS	1.80	2
MISSOURI	2.15	3
MISSISSIPPI	2.51	4
WASHINGTON	2.54	5
NORTH CAROLINA	2.75	6
NEBRASKA	3.15	7
NEW JERSEY	3.28	8
HAWAII	3.29	9
PENNSYLVANIA	3.32	10
ALABAMA	3.39	11
MASSACHUSETTS	3.40	12
NORTH DAKOTA	3.60	13
NEVADA	3.63	14
RHODE ISLAND	3.71	15
UTAH	4.07	16
NEW YORK	4.31	17
IDAHO	4.65	18
VERMONT	5.05	19
OREGON	5.10	20
CONNECTICUT	5.29	21
TENNESSEE	5.30	22
WYOMING	5.39	23
MARYLAND	5.49	24
KENTUCKY	5.66	25
ALASKA	5.74	26
ILLINOIS	5.84	27
NEW HAMPSHIRE	6.04	28
WISCONSIN	6.05	29
CALIFORNIA	6.05	30
SOUTH CAROLINA	6.11	31
KANSAS	6.30	32
MONTANA	6.34	33
TEXAS	6.36	34
IOWA	6.38	35
INDIANA	6.49	36
COLORADO	6.60	37
NEW MEXICO	6.62	38
VIRGINIA	6.63	39
OHIO	6.85	40
GEORGIA	7.01	41
WEST VIRGINIA	7.07	42
ARKANSAS	7.09	43
OKLAHOMA	7.10	44
GUAM	7.19	45
MICHIGAN	7.28	46
MINNESOTA	7.37	47
DELAWARE	7.92	48
ARIZONA	8.15	49
FLORIDA	8.33	50
DIST. OF COL.	8.75	51
MAINE	9.28	52

Report Run Date:
 February 1, 2007

State	FY 2005 Cumulative Oct - Sep /2	FY 2006 Cumulative Oct.-Sept.*	Change
RHODE ISLAND	9.21	3.71	-5.50
IDAHO	8.23	4.65	-3.58
MISSOURI	4.73	2.15	-2.58
HAWAII	5.47	3.29	-2.18
OHIO	8.51	6.85	-1.66
NEW YORK	5.96	4.31	-1.65
WYOMING	6.84	5.39	-1.45
CONNECTICUT	6.47	5.29	-1.18
PENNSYLVANIA	4.31	3.32	-0.99
NEBRASKA	4.03	3.15	-0.88
OREGON	5.94	5.10	-0.84
NEW JERSEY	3.93	3.28	-0.65
WASHINGTON	3.05	2.54	-0.51
TENNESSEE	5.75	5.30	-0.45
ALABAMA	3.83	3.39	-0.44
ALASKA	6.18	5.74	-0.44
VERMONT	5.38	5.05	-0.33
VIRGIN ISLANDS	2.11	1.80	-0.31
MASSACHUSETTS	3.69	3.40	-0.29
OKLAHOMA	7.39	7.10	-0.29
UTAH	4.27	4.07	-0.20
COLORADO	6.77	6.60	-0.17
NORTH CAROLINA	2.89	2.75	-0.14
MINNESOTA	7.36	7.37	0.01
INDIANA	6.44	6.49	0.05
NORTH DAKOTA	3.55	3.60	0.05
MARYLAND	5.42	5.49	0.07
CALIFORNIA	5.86	6.05	0.19
NEW HAMPSHIRE	5.85	6.04	0.19
MICHIGAN	7.05	7.28	0.23
ILLINOIS	5.41	5.84	0.43
ARIZONA	7.68	8.15	0.47
SOUTH DAKOTA	1.17	1.79	0.62
WISCONSIN	5.38	6.05	0.67
NEW MEXICO	5.89	6.62	0.73
SOUTH CAROLINA	5.33	6.11	0.78
GUAM	6.22	7.19	0.97
KANSAS	5.31	6.30	0.99
VIRGINIA	5.59	6.63	1.04
IOWA	5.29	6.38	1.09
FLORIDA	7.14	8.33	1.19
NEVADA	2.43	3.63	1.20
WEST VIRGINIA	5.69	7.07	1.38
DIST. OF COL.	7.32	8.75	1.43
KENTUCKY	4.20	5.66	1.46
TEXAS	4.81	6.36	1.55
DELAWARE	6.32	7.92	1.60
ARKANSAS	5.38	7.09	1.71
MAINE	7.27	9.28	2.01
GEORGIA	4.52	7.01	2.49
MONTANA	3.68	6.34	2.66

LOUISIANA Katrina_1 n/a
 1/ no Oct-Dec data

LOUISIANA Katrina n/a
 MISSISSIPPI Katrina n/a

Florida implemented Florida HREES in July 2006
 Planning started

Active Reported Payment Error Rates

Report Run Date: STATE-REPORTED SUMMARY DATA

February 1, 2007

State	FY 2006		Rank
	Oct.-Sept.*	Cumulative	
SOUTH DAKOTA	1.79	1	
VIRGIN ISLANDS	1.80	2	
MISSOURI	2.15	3	
MISSISSIPPI	2.51	4	
WASHINGTON	2.54	5	
NORTH CAROLINA	2.75	6	
NEBRASKA	3.15	7	
NEW JERSEY	3.28	8	
HAWAII	3.29	9	
PENNSYLVANIA	3.32	10	
ALABAMA	3.39	11	
MASSACHUSETTS	3.40	12	
NORTH DAKOTA	3.60	13	
NEVADA	3.63	14	
RHODE ISLAND	3.71	15	
UTAH	4.07	16	
NEW YORK	4.31	17	
IDAHO	4.65	18	
VERMONT	5.05	19	
OREGON	5.10	20	
CONNECTICUT	5.29	21	
TENNESSEE	5.30	22	
WYOMING	5.39	23	
MARYLAND	5.49	24	
KENTUCKY	5.66	25	
ALASKA	5.74	26	
ILLINOIS	5.84	27	
NEW HAMPSHIRE	6.04	28	
WISCONSIN	6.05	29	
CALIFORNIA	6.05	30	
SOUTH CAROLINA	6.11	31	
KANSAS	6.30	32	
MONTANA	6.34	33	
TEXAS	6.36	34	
IOWA	6.38	35	
INDIANA	6.49	36	
COLORADO	6.60	37	
NEW MEXICO	6.62	38	
VIRGINIA	6.63	39	
OHIO	6.85	40	
GEORGIA	7.01	41	
WEST VIRGINIA	7.07	42	
ARKANSAS	7.09	43	
OKLAHOMA	7.10	44	
GUAM	7.19	45	
MICHIGAN	7.28	46	
MINNESOTA	7.37	47	
DELAWARE	7.92	48	
ARIZONA	8.15	49	
FLORIDA	8.23	50	
DIST. OF COL.	8.75	51	
MAINE	9.28	52	

LOUISIANA Katrina_1 n/a
 1/ no Oct-Dec data

Report Run Date:

February 1, 2007

State	FY 2005	FY 2006	Change
	Cumulative Oct - Sep /2	Cumulative Oct.-Sept.*	
RHODE ISLAND	9.21	3.71	-5.50
IDAHO	8.23	4.65	-3.58
MISSOURI	4.73	2.15	-2.58
HAWAII	5.47	3.29	-2.18
OHIO	8.51	6.85	-1.66
NEW YORK	5.96	4.31	-1.65
WYOMING	6.84	5.39	-1.45
CONNECTICUT	6.47	5.29	-1.18
PENNSYLVANIA	4.31	3.32	-0.99
NEBRASKA	4.03	3.15	-0.88
OREGON	5.94	5.10	-0.84
NEW JERSEY	3.93	3.28	-0.65
WASHINGTON	3.05	2.54	-0.51
TENNESSEE	5.75	5.30	-0.45
ALABAMA	3.83	3.39	-0.44
ALASKA	6.18	5.74	-0.44
VERMONT	5.38	5.05	-0.33
VIRGIN ISLANDS	2.11	1.80	-0.31
MASSACHUSETTS	3.69	3.40	-0.29
OKLAHOMA	7.39	7.10	-0.29
UTAH	4.27	4.07	-0.20
COLORADO	6.77	6.60	-0.17
NORTH CAROLINA	2.89	2.75	-0.14
MINNESOTA	7.36	7.37	0.01
INDIANA	6.44	6.49	0.05
NORTH DAKOTA	3.55	3.60	0.05
MARYLAND	5.42	5.49	0.07
CALIFORNIA	5.86	6.05	0.19
NEW HAMPSHIRE	5.85	6.04	0.19
MICHIGAN	7.05	7.28	0.23
ILLINOIS	5.41	5.84	0.43
ARIZONA	7.68	8.15	0.47
SOUTH DAKOTA	1.17	1.79	0.62
WISCONSIN	5.38	6.05	0.67
NEW MEXICO	5.89	6.62	0.73
SOUTH CAROLINA	5.33	6.11	0.78
GUAM	6.22	7.19	0.97
KANSAS	5.31	6.30	0.99
VIRGINIA	5.59	6.63	1.04
IOWA	5.29	6.38	1.09
FLORIDA	7.14	8.33	1.19
NEVADA	2.43	3.63	1.20
WEST VIRGINIA	5.69	7.07	1.38
DIST. OF COL.	7.32	8.75	1.43
KENTUCKY	4.20	5.66	1.46
TEXAS	4.81	6.36	1.55
DELAWARE	6.32	7.92	1.60
ARKANSAS	5.38	7.09	1.71
MAINE	7.27	9.28	2.01
GEORGIA	4.52	7.01	2.49
MONTANA	3.68	6.34	2.66

LOUISIANA Katrina n/a
 MISSISSIPPI Katrina n/a

SFY 2007 SUMMARY.xls
(STATEWIDE SUMMARY)

NUMBER OF PERSONS									
MONTH	TANF	TAONF	NA	GA	SSI	ABD	NPA	TOTAL	Timeliness
Jul	12,068	5,409	2,044	2,717	12,045	986	50,691	85,960	81.50%
Aug	12,297	5,333	2,200	2,818	12,153	955	52,547	88,303	81.70%
Sep	12,420	5,382	2,309	2,871	12,172	945	53,269	89,368	81.50%
Oct	12,356	5,442	2,408	2,830	12,207	954	53,441	89,638	80.50%
Nov	11,980	5,451	2,589	2,807	12,245	926	53,484	89,482	79.50%
Dec	11,675	5,299	2,583	2,899	12,257	922	54,109	89,744	79.00%
Jan	11,553	5,250	2,533	2,935	12,372	799	53,955	89,397	80.50%
Feb	11,242	5,113	2,525	2,949	12,384	771	53,599	88,583	81.50%
Mar	11,025	4,966	2,581	3,007	12,474	727	53,983	88,763	80.80%
Apr	10,670	5,087	2,523	2,985	12,484	687	53,735	88,171	80.70%
May	10,529	5,146	2,602	2,965	12,546	669	54,662	89,119	80.50%
Jun	10,225	4,990	2,684	2,978	12,600	647	55,522	89,646	80.20%
MON AVE	11,503	5,239	2,465	2,897	12,328	832	53,583	88,848	
NUMBER OF HOUSEHOLDS									
MONTH	TANF	TAONF	NA	GA	SSI	ABD	NPA	TOTAL	
Jul	4,148	1,592	580	2,685	11,059	912	22,971	43,947	
Aug	4,221	1,572	623	2,784	11,166	878	23,494	44,738	
Sep	4,254	1,595	643	2,838	11,183	873	23,799	45,185	
Oct	4,228	1,609	656	2,798	11,228	882	23,848	45,249	
Nov	4,096	1,616	715	2,777	11,253	860	23,823	45,140	
Dec	3,995	1,590	703	2,870	11,267	858	24,032	45,315	
Jan	3,936	1,574	688	2,905	11,382	733	23,993	45,211	
Feb	3,806	1,547	679	2,916	11,403	702	23,833	44,886	
Mar	3,753	1,527	685	2,973	11,494	657	24,090	45,179	
Apr	3,631	1,554	658	2,954	11,494	618	23,912	44,821	
May	3,591	1,582	696	2,930	11,548	600	24,272	45,219	
Jun	3,470	1,555	706	2,943	11,598	584	24,581	45,437	
MON AVE	3,927	1,576	669	2,864	11,340	763	23,887	45,027	
COUPON ISSUANCE									
MONTH	TANF	TAONF	NA	GA	SSI	ABD	NPA	TOTAL	
Jul	1,744,663	761,439	262,845	496,643	1,533,904	179,808	7,056,236	12,035,538	
Aug	1,793,517	755,476	283,927	516,110	1,549,494	172,150	7,237,919	12,308,593	
Sep	1,805,463	763,464	293,824	529,015	1,554,318	169,707	7,304,676	12,420,467	
Oct	1,920,571	819,376	330,373	555,857	1,704,195	182,793	7,830,819	13,343,984	
Nov	1,859,235	821,854	353,660	550,088	1,709,265	177,288	7,800,640	13,272,030	
Dec	1,802,542	802,044	357,412	569,215	1,716,005	177,288	7,886,419	13,310,925	
Jan	1,774,339	788,257	340,117	573,729	1,657,045	152,741	7,780,810	13,067,038	
Feb	1,726,416	769,434	337,833	575,597	1,658,475	146,751	7,711,955	12,926,461	
Mar	1,692,205	754,034	341,661	588,308	1,673,716	140,387	7,813,651	13,003,962	
Apr	1,627,827	770,821	331,615	584,149	1,679,359	131,420	7,766,434	12,891,625	
May	1,610,335	783,293	344,259	580,023	1,687,771	128,656	7,915,037	13,049,374	
Jun	1,554,743	761,691	354,384	579,485	1,700,325	125,347	8,015,229	13,091,204	
MON AVE	1,742,655	779,265	327,659	558,185	1,651,989	157,028	7,676,652	12,893,433	

SFY 2008 SUMMARY.xls
(STATE TOTALS)

MONTH	NUMBER OF PERSONS								Timeliness
	TANF	TAONF	NA	GA	SSI	ABD	NPA	TOTAL	
Jul	10,264	5,098	2,886	2,986	12,548	696	55,714	90,192	99.10%
Aug	10,477	5,082	3,043	3,052	12,519	730	56,226	91,129	99.30%
Sep	10,430	4,927	3,106	3,110	12,537	765	56,807	91,682	97.20%
Oct	10,654	4,396	3,235	3,187	12,477	798	57,739	92,486	96.50%
Nov	10,660	4,478	3,366	3,226	12,481	835	58,144	93,190	99.70%
Dec	10,863	4,523	3,202	3,304	12,491	850	58,683	93,916	98.20%
Jan	10,990	4,504	3,324	3,357	12,522	841	58,800	94,338	96.40%
Feb	10,908	4,419	3,283	3,335	12,561	866	59,403	94,775	97.60%
Mar	10,563	4,217	3,539	3,355	12,551	877	59,915	95,017	98.00%
Apr	10,317	4,253	3,831	3,355	12,589	894	60,799	96,038	92.80%
May	10,290	4,289	3,955	3,412	12,581	924	61,411	96,862	92.40%
Jun	10,274	4,188	3,827	3,459	12,603	942	62,552	97,845	96.20%
MON AVE	10,558	4,531	3,383	3,262	12,538	835	58,849	93,956	

MONTH	NUMBER OF HOUSEHOLDS							
	TANF	TAONF	NA	GA	SSI	ABD	NPA	TOTAL
Jul	3,468	1,589	777	2,955	11,556	631	24,706	45,682
Aug	3,552	1,562	851	3,019	11,529	662	24,895	46,070
Sep	3,538	1,523	868	3,079	11,544	697	25,104	46,353
Oct	3,608	1,207	912	3,153	11,490	727	25,657	46,754
Nov	3,606	1,206	960	3,192	11,485	763	25,818	47,030
Dec	3,666	1,191	910	3,271	11,511	779	26,016	47,344
Jan	3,704	1,173	938	3,323	11,542	776	26,219	47,675
Feb	3,677	1,137	937	3,303	11,584	799	26,448	47,885
Mar	3,576	1,085	1,018	3,322	11,580	815	26,783	48,179
Apr	3,502	1,098	1,120	3,320	11,618	828	27,291	48,777
May	3,504	1,099	1,163	3,374	11,623	860	27,574	49,197
Jun	3,477	1,085	1,119	3,425	11,642	879	27,972	49,599
MON AVE	3,573	1,246	964	3,228	11,559	768	26,207	47,545

MONTH	COUPON ISSUANCE							
	TANF	TAONF	NA	GA	SSI	ABD	NPA	TOTAL
Jul	1,486,014	743,146	386,627	539,409	1,690,658	124,707	8,033,969	13,004,530
Aug	1,521,190	740,573	409,098	549,704	1,683,744	130,534	8,115,955	13,150,798
Sep	1,502,340	715,585	413,830	563,946	1,688,428	136,900	8,192,376	13,213,405
Oct	1,708,092	698,124	484,959	634,441	1,893,858	158,027	9,224,766	14,802,267
Nov	1,703,771	706,586	499,640	642,469	1,895,948	164,069	9,277,318	14,889,801
Dec	1,737,614	706,084	470,775	657,391	1,899,692	167,823	9,329,875	14,969,254
Jan	1,748,509	706,189	496,053	669,477	1,847,867	165,603	9,289,090	14,922,788
Feb	1,733,696	695,330	499,704	659,022	1,852,312	170,173	9,409,681	15,019,918
Mar	1,675,154	657,199	552,469	668,250	1,853,752	173,608	9,517,454	15,097,886
Apr	1,641,293	666,376	625,863	667,456	1,859,669	175,701	9,728,118	15,364,476
May	1,642,858	667,346	656,253	677,924	1,859,966	181,272	9,842,925	15,528,544
Jun	1,635,819	655,101	636,918	688,341	1,866,221	185,676	10,076,728	15,744,804
MON AVE	1,644,696	696,470	511,016	634,819	1,824,343	161,174	9,169,855	14,642,373

SFY 2008 SUMMARY.xls
(STATE TOTALS)

MONTH	TANF	TAONE	NUMBER OF PERSONS					TOTAL	Timeliness
			NA	GA	SSI	ABD	NPA		
Jul	10,264	5,098	2,886	2,986	12,548	696	55,714	90,192	99.40%
Aug	10,477	5,082	3,043	3,052	12,519	730	56,226	91,129	99.30%
Sep	10,430	4,927	3,106	3,110	12,537	765	56,807	91,682	99.20%
Oct	10,654	4,396	3,235	3,187	12,477	798	57,739	92,486	99.60%
Nov	10,660	4,478	3,366	3,226	12,481	835	58,144	93,190	99.70%
Dec	10,863	4,523	3,202	3,304	12,491	850	58,683	93,916	99.25%
Jan	10,990	4,504	3,324	3,357	12,522	841	58,800	94,338	99.40%
Feb	10,908	4,419	3,283	3,335	12,561	866	59,403	94,775	97.60%
Mar	10,563	4,217	3,539	3,355	12,551	877	59,915	95,017	99.60%
Apr	10,317	4,253	3,831	3,355	12,589	894	60,799	96,038	99.80%
May	10,290	4,289	3,955	3,412	12,581	924	61,411	96,862	99.70%
Jun	10,274	4,188	3,827	3,459	12,603	942	62,552	97,845	99.20%
MON AVE	10,558	4,531	3,383	3,262	12,538	835	58,849	93,956	

MONTH	TANF	TAONE	NUMBER OF HOUSEHOLDS					TOTAL
			NA	GA	SSI	ABD	NPA	
Jul	3,468	1,589	777	2,955	11,556	631	24,706	45,682
Aug	3,552	1,562	851	3,019	11,529	662	24,895	46,070
Sep	3,538	1,523	868	3,079	11,544	697	25,104	46,353
Oct	3,608	1,207	912	3,153	11,490	727	25,657	46,754
Nov	3,606	1,206	960	3,192	11,485	763	25,818	47,030
Dec	3,666	1,191	910	3,271	11,511	779	26,016	47,344
Jan	3,704	1,173	938	3,323	11,542	776	26,219	47,675
Feb	3,677	1,137	937	3,303	11,584	799	26,448	47,885
Mar	3,576	1,085	1,018	3,322	11,580	815	26,783	48,179
Apr	3,502	1,098	1,120	3,320	11,618	828	27,291	48,777
May	3,504	1,099	1,163	3,374	11,623	860	27,574	49,197
Jun	3,477	1,085	1,119	3,425	11,642	879	27,972	49,599
MON AVE	3,573	1,246	964	3,228	11,559	768	26,207	47,545

MONTH	TANF	TAONE	COUPON ISSUANCE					TOTAL
			NA	GA	SSI	ABD	NPA	
Jul	1,486,014	743,146	386,627	539,409	1,690,658	124,707	8,033,969	13,004,530
Aug	1,521,190	740,573	409,098	549,704	1,683,744	130,534	8,115,955	13,150,798
Sep	1,502,340	715,585	413,830	563,946	1,688,428	136,900	8,192,376	13,213,405
Oct	1,708,092	698,124	484,959	634,441	1,893,858	158,027	9,224,766	14,802,267
Nov	1,703,771	706,586	499,640	642,469	1,895,948	164,069	9,277,318	14,889,801
Dec	1,737,614	706,084	470,775	657,391	1,899,692	167,823	9,329,875	14,969,254
Jan	1,748,509	706,189	496,053	669,477	1,847,867	165,603	9,289,090	14,922,788
Feb	1,733,696	695,330	499,704	659,022	1,852,312	170,173	9,409,681	15,019,918
Mar	1,675,154	657,199	552,469	668,250	1,853,752	173,608	9,517,454	15,097,886
Apr	1,641,293	666,376	625,863	667,456	1,859,669	175,701	9,728,118	15,364,476
May	1,642,858	667,346	656,253	677,924	1,859,966	181,272	9,842,925	15,528,544
Jun	1,635,819	655,101	636,918	688,341	1,866,221	185,676	10,076,728	15,744,804
MON AVE	1,644,696	696,470	511,016	634,819	1,824,343	161,174	9,169,855	14,642,373

SFY 2007 SUMMARY.xls
(STATEWIDE SUMMARY)

NUMBER OF PERSONS									
MONTH	TANF	TAONF	NA	GA	SSI	ABD	NPA	TOTAL	Timeliness
Jul	12,068	5,409	2,044	2,717	12,045	986	50,691	85,960	81.50%
Aug	12,297	5,333	2,200	2,818	12,153	955	52,547	88,303	82.70%
Sep	12,420	5,382	2,309	2,871	12,172	945	53,269	89,368	78.50%
Oct	12,356	5,442	2,408	2,830	12,207	954	53,441	89,638	78.50%
Nov	11,980	5,451	2,589	2,807	12,245	926	53,484	89,482	79.30%
Dec	11,675	5,299	2,583	2,899	12,257	922	54,109	89,744	71.00%
Jan	11,553	5,250	2,533	2,935	12,372	799	53,955	89,397	80.30%
Feb	11,242	5,113	2,525	2,949	12,384	771	53,599	88,583	83.70%
Mar	11,025	4,966	2,581	3,007	12,474	727	53,983	88,763	88.80%
Apr	10,670	5,087	2,523	2,985	12,484	687	53,735	88,171	85.70%
May	10,529	5,146	2,602	2,965	12,546	669	54,662	89,119	89.00%
Jun	10,225	4,990	2,684	2,978	12,600	647	55,522	89,646	88.20%
MON AVE	11,503	5,239	2,465	2,897	12,328	832	53,583	88,848	
NUMBER OF HOUSEHOLDS									
MONTH	TANF	TAONF	NA	GA	SSI	ABD	NPA	TOTAL	
Jul	4,148	1,592	580	2,685	11,059	912	22,971	43,947	
Aug	4,221	1,572	623	2,784	11,166	878	23,494	44,738	
Sep	4,254	1,595	643	2,838	11,183	873	23,799	45,185	
Oct	4,228	1,609	656	2,798	11,228	882	23,848	45,249	
Nov	4,096	1,616	715	2,777	11,253	860	23,823	45,140	
Dec	3,995	1,590	703	2,870	11,267	858	24,032	45,315	
Jan	3,936	1,574	688	2,905	11,382	733	23,993	45,211	
Feb	3,806	1,547	679	2,916	11,403	702	23,833	44,886	
Mar	3,753	1,527	685	2,973	11,494	657	24,090	45,179	
Apr	3,631	1,554	658	2,954	11,494	618	23,912	44,821	
May	3,591	1,582	696	2,930	11,548	600	24,272	45,219	
Jun	3,470	1,555	706	2,943	11,598	584	24,581	45,437	
MON AVE	3,927	1,576	669	2,864	11,340	763	23,887	45,027	
COUPON ISSUANCE									
MONTH	TANF	TAONF	NA	GA	SSI	ABD	NPA	TOTAL	
Jul	1,744,663	761,439	262,845	496,643	1,533,904	179,808	7,056,236	12,035,538	
Aug	1,793,517	755,476	283,927	516,110	1,549,494	172,150	7,237,919	12,308,593	
Sep	1,805,463	763,464	293,824	529,015	1,554,318	169,707	7,304,676	12,420,467	
Oct	1,920,571	819,376	330,373	555,857	1,704,195	182,793	7,830,819	13,343,984	
Nov	1,859,235	821,854	353,660	550,088	1,709,265	177,288	7,800,640	13,272,030	
Dec	1,802,542	802,044	357,412	569,215	1,716,005	177,288	7,886,419	13,310,925	
Jan	1,774,339	788,257	340,117	573,729	1,657,045	152,741	7,780,810	13,067,038	
Feb	1,726,416	769,434	337,833	575,597	1,658,475	146,751	7,711,955	12,926,461	
Mar	1,692,205	754,034	341,661	588,308	1,673,716	140,387	7,813,651	13,003,962	
Apr	1,627,827	770,821	331,615	584,149	1,679,359	131,420	7,766,434	12,891,625	
May	1,610,335	783,293	344,259	580,023	1,687,771	128,656	7,915,037	13,049,374	
Jun	1,554,743	761,691	354,384	579,485	1,700,325	125,347	8,015,229	13,091,204	
MON AVE	1,742,655	779,265	327,659	558,185	1,651,989	157,028	7,676,652	12,893,433	

SFY 2009 SUMMARY.xls
(STATE TOTALS)

MONTH	TANF	TAONF	NUMBER OF PERSONS			ABD	NPA	TOTAL	Timeliness
			NA	GA	SSI				
Jul	10,212	4,293	3,930	3,524	12,690	952	64,034	99,635	87.70%
Aug	10,379	4,406	4,048	3,532	12,753	946	65,591	101,655	88.30%
Sep	10,501	4,675	4,032	3,567	12,772	957	66,351	102,855	87.00%
Oct	11,491	5,243	1,936	3,649	12,817	987	68,977	105,100	87.00%
Nov	11,367	5,221	1,910	3,721	12,832	990	70,962	107,003	87.40%
Dec	11,523	5,163	1,865	3,805	12,864	1,006	72,746	108,972	85.80%
Jan	11,449	5,102	1,876	3,898	12,923	974	73,486	109,708	84.50%
Feb	11,323	5,145	1,893	3,902	12,934	965	74,753	110,915	84.80%
Mar	11,255	5,169	1,837	3,900	12,935	974	76,451	112,521	86.00%
Apr	11,175	5,206	1,861	3,800	13,006	979	78,978	115,005	83.70%
May	11,166	5,385	1,865	3,810	13,025	973	81,424	117,648	80.00%
Jun	11,293	5,277	1,809	3,734	13,091	982	84,007	120,193	83.00%
MON AVE	11,095	5,024	2,405	3,737	12,887	974	73,147	109,268	

MONTH	TANF	TAONF	NUMBER OF HOUSEHOLDS			ABD	NPA	TOTAL
			NA	GA	SSI			
Jul	3,464	1,101	1,172	3,492	11,705	885	28,595	50,414
Aug	3,526	1,127	1,178	3,500	11,754	878	29,302	51,265
Sep	3,565	1,200	1,166	3,538	11,783	891	29,631	51,774
Oct	3,928	1,358	469	3,616	11,826	913	30,779	52,889
Nov	3,879	1,348	456	3,681	11,854	916	31,522	53,656
Dec	3,934	1,332	451	3,754	11,899	929	32,370	54,669
Jan	3,921	1,305	452	3,846	11,942	898	32,623	54,987
Feb	3,879	1,302	456	3,852	11,971	890	33,232	55,582
Mar	3,865	1,298	446	3,857	11,977	903	34,084	56,430
Apr	3,841	1,322	446	3,761	12,044	909	35,508	57,831
May	3,863	1,365	446	3,765	12,068	907	36,754	59,168
Jun	3,885	1,351	433	3,692	12,128	916	38,035	60,440
MON AVE	3,796	1,284	631	3,696	11,913	903	32,703	54,925

MONTH	TANF	TAONF	COUPON ISSUANCE			ABD	NPA	TOTAL
			NA	GA	SSI			
Jul	1,637,295	672,246	662,252	701,308	1,880,982	187,665	10,340,661	16,082,409
Aug	1,665,863	693,413	683,174	704,246	1,893,963	187,364	10,596,126	16,424,149
Sep	1,683,001	737,875	677,788	712,428	1,899,699	189,618	10,726,010	16,626,419
Oct	2,086,735	929,518	291,079	810,692	2,231,009	219,727	12,384,434	18,953,194
Nov	2,053,202	926,637	285,526	827,128	2,236,592	220,788	12,742,379	19,292,252
Dec	2,091,742	924,256	275,634	846,033	2,244,760	223,246	13,092,594	19,698,265
Jan	2,068,994	902,954	276,496	861,207	2,098,312	215,888	13,048,813	19,472,664
Feb	2,043,891	913,717	284,561	866,133	2,109,289	215,142	13,367,891	19,800,624
Mar	2,027,226	912,221	272,938	873,131	2,117,580	217,695	13,795,589	20,216,380
Apr	2,380,629	1,092,593	332,919	1,162,057	2,620,481	254,480	16,868,807	24,711,966
May	2,392,671	1,125,098	335,259	1,163,195	2,621,387	252,577	17,499,221	25,389,408
Jun	2,418,422	1,108,717	326,660	1,140,465	2,637,562	256,315	18,087,804	25,975,945
MON AVE	2,045,806	911,604	392,024	889,002	2,215,968	220,042	13,545,861	20,220,306

SFY 2010 SUMMARY.xls
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MONTH	NUMBER OF PERSONS								Timeliness
	TANF	TAONF	NA	GA	SSI	ABD	NPA	TOTAL	
Jul	11,374	5,474	1,808	3,743	13,251	907	86,147	122,704	87.00%
Aug	11,335	5,434	1,773	3,662	13,334	851	88,668	125,057	85.70%
Sep	11,306	5,575	1,775	3,749	13,464	804	90,877	127,550	83.00%
Oct	11,490	5,696	1,775	3,842	13,525	754	92,454	129,536	83.70%
Nov	11,326	5,560	1,782	3,750	13,641	718	94,584	131,361	80.00%
Dec	15,574	1,252	1,762	3,778	13,707	695	97,253	134,021	86.50%
Jan	11,375	5,288	1,737	3,793	13,725	671	98,096	134,685	86.30%
Feb	12,134	4,400	1,745	3,735	13,781	651	99,065	135,511	78.50%
Mar	0	0	0	0	0	0	0	0	
Apr	0	0	0	0	0	0	0	0	
May	0	0	0	0	0	0	0	0	
Jun	0	0	0	0	0	0	0	0	
MON AVE	11,989	4,835	1,770	3,757	13,554	756	93,393	130,053	

MONTH	NUMBER OF HOUSEHOLDS							
	TANF	TAONF	NA	GA	SSI	ABD	NPA	TOTAL
Jul	3,914	1,404	434	3,696	12,263	837	39,075	61,623
Aug	3,902	1,414	424	3,620	12,356	784	40,352	62,852
Sep	3,890	1,462	422	3,702	12,476	736	41,467	64,155
Oct	3,946	1,502	420	3,793	12,552	686	42,215	65,114
Nov	3,905	1,456	423	3,694	12,641	650	43,248	66,017
Dec	4,886	464	421	3,726	12,696	629	44,456	67,278
Jan	3,905	1,385	417	3,741	12,741	609	44,852	67,650
Feb	4,101	1,152	413	3,679	12,781	585	45,382	68,093
Mar	0	0	0	0	0	0	0	0
Apr	0	0	0	0	0	0	0	0
May	0	0	0	0	0	0	0	0
Jun	0	0	0	0	0	0	0	0
MON AVE	4,056	1,280	422	3,706	12,563	690	42,631	65,348

MONTH	COUPON ISSUANCE							
	TANF	TAONF	NA	GA	SSI	ABD	NPA	TOTAL
Jul	2,471,287	1,161,336	327,602	986,592	2,679,956	239,361	18,521,011	26,387,145
Aug	2,462,745	1,154,329	322,937	963,622	2,698,091	224,498	19,041,833	26,868,055
Sep	2,460,737	1,191,338	325,421	988,788	2,729,721	213,638	19,614,510	27,524,153
Oct	2,504,495	1,216,204	325,053	1,009,835	2,726,292	197,815	19,903,020	27,882,714
Nov	2,467,478	1,190,394	328,479	1,102,811	2,745,789	188,963	20,411,400	28,435,314
Dec	3,357,606	283,456	321,627	1,113,477	2,766,882	182,623	21,004,654	29,030,325
Jan	2,454,117	1,088,336	318,539	1,117,717	2,771,409	177,104	21,004,662	28,931,884
Feb	2,613,040	905,793	320,696	1,103,655	2,784,446	172,256	21,408,304	29,308,190
Mar	0	0	0	0	0	0	0	0
Apr	0	0	0	0	0	0	0	0
May	0	0	0	0	0	0	0	0
Jun	0	0	0	0	0	0	0	0
MON AVE	2,598,938	1,023,898	323,794	1,048,312	2,737,823	199,532	20,113,674	28,045,973

SFY 2010 SUMMARY.xls
(STATE TOTALS)

MONTH	NUMBER OF PERSONS								Timeliness
	TANF	TAONF	NA	GA	SSI	ABD	NPA	TOTAL	
Jul	11,374	5,474	1,808	3,743	13,251	907	86,147	122,704	87.00%
Aug	11,335	5,434	1,773	3,662	13,334	851	88,668	125,057	85.70%
Sep	11,306	5,575	1,775	3,749	13,464	804	90,877	127,550	85.00%
Oct	11,490	5,696	1,775	3,842	13,525	754	92,454	129,536	83.50%
Nov	11,326	5,560	1,782	3,750	13,641	718	94,584	131,361	86.00%
Dec	15,574	1,252	1,762	3,778	13,707	695	97,253	134,021	86.50%
Jan	11,375	5,288	1,737	3,793	13,725	671	98,096	134,685	86.50%
Feb	12,134	4,400	1,745	3,735	13,781	651	99,065	135,511	79.50%
Mar	0	0	0	0	0	0	0	0	
Apr	0	0	0	0	0	0	0	0	
May	0	0	0	0	0	0	0	0	
Jun	0	0	0	0	0	0	0	0	
MON AVE	11,989	4,835	1,770	3,757	13,554	756	93,393	130,053	

MONTH	NUMBER OF HOUSEHOLDS							
	TANF	TAONF	NA	GA	SSI	ABD	NPA	TOTAL
Jul	3,914	1,404	434	3,696	12,263	837	39,075	61,623
Aug	3,902	1,414	424	3,620	12,356	784	40,352	62,852
Sep	3,890	1,462	422	3,702	12,476	736	41,467	64,155
Oct	3,946	1,502	420	3,793	12,552	686	42,215	65,114
Nov	3,905	1,456	423	3,694	12,641	650	43,248	66,017
Dec	4,886	464	421	3,726	12,696	629	44,456	67,278
Jan	3,905	1,385	417	3,741	12,741	609	44,852	67,650
Feb	4,101	1,152	413	3,679	12,781	585	45,382	68,093
Mar	0	0	0	0	0	0	0	0
Apr	0	0	0	0	0	0	0	0
May	0	0	0	0	0	0	0	0
Jun	0	0	0	0	0	0	0	0
MON AVE	4,056	1,280	422	3,706	12,563	690	42,631	65,348

MONTH	COUPON ISSUANCE							
	TANF	TAONF	NA	GA	SSI	ABD	NPA	TOTAL
Jul	2,471,287	1,161,336	327,602	986,592	2,679,956	239,361	18,521,011	26,387,145
Aug	2,462,745	1,154,329	322,937	963,622	2,698,091	224,498	19,041,833	26,868,055
Sep	2,460,737	1,191,338	325,421	988,788	2,729,721	213,638	19,614,510	27,524,153
Oct	2,504,495	1,216,204	325,053	1,009,835	2,726,292	197,815	19,903,020	27,882,714
Nov	2,467,478	1,190,394	328,479	1,102,811	2,745,789	188,963	20,411,400	28,435,314
Dec	3,357,606	283,456	321,627	1,113,477	2,766,882	182,623	21,004,654	29,030,325
Jan	2,454,117	1,088,336	318,539	1,117,717	2,771,409	177,104	21,004,662	28,931,884
Feb	2,613,040	905,793	320,696	1,103,655	2,784,446	172,256	21,408,304	29,308,190
Mar	0	0	0	0	0	0	0	0
Apr	0	0	0	0	0	0	0	0
May	0	0	0	0	0	0	0	0
Jun	0	0	0	0	0	0	0	0
MON AVE	2,598,938	1,023,898	323,794	1,048,312	2,737,823	199,532	20,113,674	28,045,973

SFY 2009 SUMMARY.xls
(STATE TOTALS)

MONTH	TANF	TAONF	NUMBER OF PERSONS					TOTAL	Timeliness
			NA	GA	SSI	ABD	NPA		
Jul	10,212	4,293	3,930	3,524	12,690	952	64,034	99,635	81.70%
Aug	10,379	4,406	4,048	3,532	12,753	946	65,591	101,655	80.86%
Sep	10,501	4,675	4,032	3,567	12,772	957	66,351	102,855	87.80%
Oct	11,491	5,243	1,936	3,649	12,817	987	68,977	105,100	80.83%
Nov	11,367	5,221	1,910	3,721	12,832	990	70,962	107,003	81.41%
Dec	11,523	5,163	1,865	3,805	12,864	1,006	72,746	108,972	86.80%
Jan	11,449	5,102	1,876	3,898	12,923	974	73,486	109,708	84.60%
Feb	11,323	5,145	1,893	3,902	12,934	965	74,753	110,915	80.80%
Mar	11,255	5,169	1,837	3,900	12,935	974	76,451	112,521	86.40%
Apr	11,175	5,206	1,861	3,800	13,006	979	78,978	115,005	81.70%
May	11,166	5,385	1,865	3,810	13,025	973	81,424	117,648	86.30%
Jun	11,293	5,277	1,809	3,734	13,091	982	84,007	120,193	85.06%
MON AVE	11,095	5,024	2,405	3,737	12,887	974	73,147	109,268	

MONTH	TANF	TAONF	NUMBER OF HOUSEHOLDS					TOTAL
			NA	GA	SSI	ABD	NPA	
Jul	3,464	1,101	1,172	3,492	11,705	885	28,595	50,414
Aug	3,526	1,127	1,178	3,500	11,754	878	29,302	51,265
Sep	3,565	1,200	1,166	3,538	11,783	891	29,631	51,774
Oct	3,928	1,358	469	3,616	11,826	913	30,779	52,889
Nov	3,879	1,348	456	3,681	11,854	916	31,522	53,656
Dec	3,934	1,332	451	3,754	11,899	929	32,370	54,669
Jan	3,921	1,305	452	3,846	11,942	898	32,623	54,987
Feb	3,879	1,302	456	3,852	11,971	890	33,232	55,582
Mar	3,865	1,298	446	3,857	11,977	903	34,084	56,430
Apr	3,841	1,322	446	3,761	12,044	909	35,508	57,831
May	3,863	1,365	446	3,765	12,068	907	36,754	59,168
Jun	3,885	1,351	433	3,692	12,128	916	38,035	60,440
MON AVE	3,796	1,284	631	3,696	11,913	903	32,703	54,925

MONTH	TANF	TAONF	COUPON ISSUANCE					TOTAL
			NA	GA	SSI	ABD	NPA	
Jul	1,637,295	672,246	662,252	701,308	1,880,982	187,665	10,340,661	16,082,409
Aug	1,665,863	693,413	683,174	704,246	1,893,963	187,364	10,596,126	16,424,149
Sep	1,683,001	737,875	677,788	712,428	1,899,699	189,618	10,726,010	16,626,419
Oct	2,086,735	929,518	291,079	810,692	2,231,009	219,727	12,384,434	18,953,194
Nov	2,053,202	926,637	285,526	827,128	2,236,592	220,788	12,742,379	19,292,252
Dec	2,091,742	924,256	275,634	846,033	2,244,760	223,246	13,092,594	19,698,265
Jan	2,068,994	902,954	276,496	861,207	2,098,312	215,888	13,048,813	19,472,664
Feb	2,043,891	913,717	284,561	866,133	2,109,289	215,142	13,367,891	19,800,624
Mar	2,027,226	912,221	272,938	873,131	2,117,580	217,695	13,795,589	20,216,380
Apr	2,380,629	1,092,593	332,919	1,162,057	2,620,481	254,480	16,868,807	24,711,966
May	2,392,671	1,125,098	335,259	1,163,195	2,621,387	252,577	17,499,221	25,389,408
Jun	2,418,422	1,108,717	326,660	1,140,465	2,637,562	256,315	18,087,804	25,975,945
MON AVE	2,045,806	911,604	392,024	889,002	2,215,968	220,042	13,545,861	20,220,306



FROM: CHAIR MZUNO

United States
Department of
Agriculture

Food and
Nutrition
Service

3101 Park
Center Drive

Alexandria, VA
22302-1500

January 22, 2010

SUBJECT: Federal Support for Enrollment and Application Processing Costs
Supplemental Nutrition Assistance Program (SNAP)

TO: All Regional Directors
Supplemental Nutrition Assistance Program (SNAP)

Under Secretary Kevin Concannon sent a letter to all State SNAP Commissioners on November 20, 2009 setting forth the Department's concern that outsourcing functions of the SNAP intake and application process has resulted in more complex and cumbersome enrollment procedures that have not furthered the mission of the program. The following guidance is intended to identify those areas of program administration that require review and approval from FNS as a condition of Federal financial participation (FFP).

Privatization is the use of non-merit system staff in the SNAP application process. As required by section 11(e)(6) of the Food and Nutrition Act of 2008 (Act) and 7 CFR 272.4(a)(2), the certification interview and final decision on eligibility determination has been exclusively a merit pay staff function and use of any other private staff in these activities requires a demonstration project waiver under section 17 of the Act. Several States have such waivers to test the impact of using community-based organization (CBO) staff to interview households. These are relatively small scale projects in limited geographic areas that supplement rather than supplant the State agency role in certification. Applicants have had the choice of going through the CBO or going directly to a merit systems State employee.

Over the past few years several States have used vendor staff to help households complete the application, gather verifying information about household circumstances, answer case specific questions from call centers and/or enter information into the State's automated data processing system. State merit staff would then conduct an interview with the household and make a determination regarding the household's eligibility and benefit level. While these projects did not require a waiver from FNS, the two largest projects have reported to FNS on key measures of access and customer service. In both cases State leadership has either abandoned or significantly altered these projects based upon poor performance in serving SNAP households. After a careful review of the impact of these projects on program administration, FNS has determined that it is not in the best interest of the households entitled to SNAP to support such projects with Federal Financial Participation (FFP).

Accordingly, FNS is requiring States to report to receive prior FNS approval if they plan to use non-merit pay staff to perform discretionary tasks in the intake and enrollment process. FNS will work with States to determine if FFP is warranted. States do not need prior approval for (1) application assistance by CBO's that is approved as part of the SNAP outreach plan that facilitates rather than replaces the role of the State worker,

(2) non-discretionary tasks such as data entry, typing, data matching, and document scanning, and (3) ancillary support services such as building security, maintenance, and technology support.

FNS continues to strongly support innovations in program delivery that enhance customer service and program efficacy. Through policy, technical assistance, and funding, FNS has and will support improved technology, enhanced process design, and partnerships with community agencies. FNS also recognizes the critical role that vendors play in automation and benefit issuance through electronic benefits transfer. We believe that this guidance will enable FNS to work with States more effectively as a Federal partner by better identifying roles and responsibilities early in designing new delivery strategies.

Questions and Answers

- **Why is FNS taking this position?** Based upon the experience of the States that have introduced private workers into the certification process, FNS believes that such an operation has inherent flaws that result in an inefficient and ultimately ineffective operation of the SNAP. In these models, applicants have been required to go through vendor staff in order to secure an interview with State workers. This has added complexity and opportunities for slippage to the enrollment process.
- **What evidence did FNS have to make this determination?** In the States where private staff has been used in the application process FNS has conducted numerous on-site reviews, and scrutinized both routine and special reports on a wide range of program metrics. In the site reviews, FNS has seen overlap and duplication in case processing. For example, a private worker verifies household information, but to do so requires the worker to ask the household several of the same questions that are asked by the State worker during the interview. This is inefficient and, in a time of growing caseloads and diminished State resources, impedes States ability to process cases timely. FNS has also seen disruption of the process as records are passed between offices without the proper controls and are delayed or lost. Private staff has sometimes lacked sufficient SNAP policy training to provide satisfactory customer service. Furthermore, FNS has reviewed data on application processing, improper denials, and payment accuracy to reach this conclusion. In particular, severe problems with the timeliness of application approvals were identified.
- **What authority does FNS have to take this position?** Under section 16 of the Act, the Secretary is authorized to pay up to 50 percent of allowable State costs for certification of SNAP households and other administrative expenses. Pursuant to Program regulations at 7 CFR Part 277, App. A; 7 CFR Part 30116 and applicable OMB Circulars, in order to be allowable costs must be necessary and reasonable for the efficient administration of the Program. If the costs associated with the use of vendor staff in the SNAP application process are not cost effective or hinder the purpose of improved program access, they could be determined unallowable.

The purpose of prior approval is to prevent States from incurring costs that are not allowable and therefore not eligible for FFP. Section 276.4 of the SNAP regulations requires FNS to determine if States' administration of the SNAP is efficient and effective. When they are not, FNS may suspend or disallow administrative funding after warning the State. FNS has determined that use of private staff in the certification process raises urgent questions regarding efficient and effective program access and integrity. We also note that section 4116 of the Food, Conservation, and Energy Act of 2008 amended section 11 of the Act to require the Secretary of Agriculture to identify and review major changes in operations by State agencies including substantial increases in the reliance on automated systems for the performance of responsibilities previously performed by State merit pay employees.

- **If a State were to contract for services with a private firm to perform certification activities as described above without FNS approval, what action would FNS take?** FNS would have a number of options. If it determines that costs associated with the contract are not necessary and reasonable for efficient administration of the program as required by 7 CFR Part 277, App. A; 7 CFR Part 3016; and applicable OMB Circulars, FNS could disallow FFP for those costs pursuant to 7 CFR 277.16(b). For example, if a State contracted for \$5 million with a firm to verify SNAP household information, FNS would normally reimburse the State \$2.5 million, but because this cost is for the use of private staff in the application process, if FNS determined that the costs were not allowable, FFP would not be provided. Other alternatives include, but are not limited to, requesting the Attorney General to seek injunctive relief against the State in the Federal courts pursuant to section 11(g) of the Act.
- **Can States use data broker services without FNS approval?** States do not need to report contracts with firms for making data available and matching that data. However, the function of making a determination as to whether the data is sufficient for verification or should result in further client contact is a key element in the certification process that would require FNS review and approval if handled by non-merit system staff.
- **Are all functions included in the application process included in the FNS position on this matter?** Any activity that involves direct contact with applicants and participants would be included. Interviewing and determining eligibility are clearly included. Taking applications or change reports over the phone at a processing (aka call) center and providing case status would also be included. Screening cases prior to interview and obtaining verification involves contact with the household so would also be a merit pay staff function. Functions that do not involve household contact (e.g., data entry may not involve contact with SNAP households) would not be included.

In addition staff providing general information on a State's hot line would not be included (the distinction between general information on a hotline and case status information from a processing center is the ability to accept or provide case specific information to the participant).

- **Is FNS opposed to States redesigning their certification process to improve efficiency through business process reengineering (BPR)?** FNS has and will continue to support States' efforts to modernize the certification process. Several States have made great strides in streamlining their operations in ways that save time and cost while improving access and customer service.
- **Would FNS share in the cost of non-merit staff in cases where the State needs to hire temporary help to deal with a backlog or as an interim step as merit staff were being hired or trained?** FNS understands that States must have the ability to deal with short term staffing shortages and need the flexibility to hire non-merit pay staff. Subject to prior approval, so long as such temporary staff did not perform those tasks reserved strictly for merit pay staff, FNS would share in the State's costs if it determined that the costs were necessary and reasonable for effective Program administration.
- **Could a State seek a waiver to allow for the use of non-merit pay staff in the certification process?** States may request a section 17 demonstration waiver to private staff in those functions reserved for merit pay staff, but the case for such a demonstration would be difficult to make. Given the experience to date it would be difficult to argue that use of non-merit pay staff has a reasonable chance of enhancing program operations. FNS will continue to consider waivers to enable CBO staff to conduct interviews. Any such projects would need to supplement existing certification activities and commit to an appropriate evaluation design and reporting.

/s/

Arthur T. Foley
Director
Program Development Division

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