

EXHIBIT 11 (part 3)

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- Manual Section 8.100.130.11A(1) Expedited food stamps: If applicant is eligible for expedited food stamp processing, issue benefits no later than the sixth day following the date of application to be available to the applicant on the seventh day or the preceding work day if the sixth day falls on a weekend or a holiday.
- The following applicants were not afforded the opportunity to participate, due to untimely approval of their expedited applications.

<i>Case Name</i>	<i>Case number</i>	<i>Application date</i>	<i>Approval date</i>	<i>Pending days</i>	<i>County response:</i>
██████████	██████████	06/03/09	06/16/09	14	We concur with the ME finding.
██████████	██████████	06/11/09	06/18/09	8	We concur with the ME finding.
██████████	██████████	06/01/09	06/18/09	18	We concur with the ME finding.
██████████	██████████	05/29/09	06/16/09	19	Our procedure for process management purposes is to issue an appointment letter on the same day application is received (when we are unable to reach a client by phone) requesting the applicant to come in for an interview within 10 days.
██████████	██████████	05/19/09	06/04/09	17	We concur with the ME finding.
██████████	██████████	05/05/09	06/02/09	29	The interviewer indicates on the check stub that further verification was necessary because client stated that the check stubs were not indicative of on-going pay. In this case, it'd be necessary to take the client statement until further proof is provided.
██████████	██████████	05/08/09	06/03/09	27	We concur with the ME finding.
██████████	██████████	02/24/09	06/08/09	105	The E & T lock-out 12/09/08 was entered in error as the 1 and 3 screens verify client was in compliance. The interviewer who screened and denied the application on 02/24/09 did not notice this as we don't customarily review those screens at time of expedite screening. When

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					client submitted another application in June, the interviewer realized the E & T disqualification had been entered in error and re-registered the case back to the original 02/24/09 application date which resulted in an untimely expedite but correct dollar issuance.
██████████	██████████	06/04/09	06/15/09	12	We concur with the ME finding.
██████████	██████████	05/15/09	06/25/09	42	The office concurs with this finding.

Community Contacts:

The ME team contacted two local community organizations. The community questionnaires are included in the addendum to this report. The following is a synopsis of each interview.

Agency Name	Contact Person	Comments/Concerns
██████████	██████████	<ul style="list-style-type: none"> ◆ Indicated a positive working relationship with the county office; office has been "awesome!" ◆ States that they have "a good little system going . . . the inmates appreciate it; they are hooked up before they hit the street." <p>Indicated that the contact with the county office is mainly through emails and he gets great feedback monthly.</p>
██████████	██████████	<ul style="list-style-type: none"> ◆ Indicated an average working relationship with the county office. ◆ Indicated that he would like to meet with the County Director to see if a point of contact could be established for his 6 mos. Program. ◆ Indicated his clients wait an average of two hours to be seen when they are dropped off at the County office. ◆ Indicated that some clients are given the barrier of being asked for an Employer Verification even though they are established in his program and present a letter stating

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Agency Name	Contact Person	Comments/Concerns
		such at the time of application.

Based on interviews with community organizations, corrective action is not required. The county office should however work with the Salvation Army to better serve their mutual clients.

Civil Rights Complaints

- **Complaints:**

- ❖ During Federal Fiscal Years (FFY) 2008-2009 four allegations of Civil Rights violations were received. The Quality Assessment Bureau closed all four cases. There are no pending civil rights violations or rude treatment allegations

- **Training/Awareness:**

- ❖ CR training was conducted in May and June 2009; two staff members, Bernadette Garcia and Karen Krauser have not attended training.
- ❖ Based on staff interviews staff indicated they were aware of the correct procedures for filing a Civil Rights / Rude Treatment discrimination complaint and usage of the ISD-416 form.
- ❖ Based on staff interviews staff indicated some confusion as to who the contacts were for the Language Line. One staff member was unclear how to use the Language Line. Through observation it was found that multiple users were utilizing one contact's code.

- **Procedures:**

- ❖ Through observation and review of case records it was found that Spanish forms are not being utilized with the Spanish speaking only clients.

Corrective Action

- The office is not in compliance with Civil Rights Standards and corrective action is required. The two staff members must attend CR training on July 27, 2009 and a copy of the sign-in sheet forwarded to QIS.
- Language Line procedures need to be addressed in a staff meeting and new contacts need to be registered.
- Spanish forms must be utilized when appropriate.

County Response: All staff filled out a language line form and they have been submitted to Gloria Madrid for processing. Staff have been instructed to use language line if they cannot find assistance in the office within five minutes so the client doesn't have to wait for assistance. All staff, including clerks, were instructed to the forms on the shared drive as all Spanish versions of the forms are available. One of the staff, Karen Krauser, needing civil rights training resigned her position effective 8/7/09. The other staff did not attend and we will send her to the Santa Fe Customer Service Training on September 8, 2009.

Constituent Concerns and Inquiries

Seventy-seven constituent concerns, inquiries, or complaints have been received and recorded in the HSD Constituency Contact And Response (CCAR) tracking log for the

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months of July 2007 through March 2009 for SE Bernalillo County. All were resolved at the county level. There are no pending concerns.

- Contacts included thirteen applicants/recipients with general program access questions.
- Twenty-two callers had Medicaid questions.
- Thirty-five callers raised questions regarding timeliness for applications, recertification, or semi-annual reports; most claiming they had provided the required information prior to the benefits expiration date.
- Six inquiries were received regarding clarification of policy or procedure in the county office.
- One call had LIHEAP questions.
- Three callers indicated they were angry or had been treated rudely.
- Five contacts inquired about the GA Program.
- Ten concerns were logged as not being able to get through to the County office or the worker failing to return their calls.
- Three complained of too long of a wait in the lobby.
- Four callers reported the county office had lost their paperwork.

Corrective Action

The county office must continue to monitor and track constituent complaints to ensure the complaints are resolved and any potential trends identified and addressed.

County Response: The county office will continue to monitor and track constituent complaints to ensure the complaints are resolved and any potential trends identified and addressed.

PAYMENT ACCURACY

Corrective Action Assessment: The final payment accuracy rate for FFY 2008 was 93.84% based on dollar reviewed of \$18,395. The county office did not meet the State target for payment accuracy for FFY 2008.

QC Analysis: As of 06/29/09 the payment accuracy rate for FFY 2009 was 92.95% based on a dollar-reviewed amount of \$4,580. Below is an analysis of QC errors for FFY 2008 and 2009.

The county submitted a Performance Goal Plan in FFY 2009.

QC Payment Accuracy

FFY	Number QC Reviews	Number Eligible/ Correct	Number Agency Errors	Number Client Errors	Total Dollar Errors	Agency Dollar Errors	Client Dollar Errors	Accuracy Rate
2008	82	74	8	4	\$1,134	\$720	\$414	93.84%
2009	20	16	2	2	\$323	\$131	\$192	92.95%

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QC Negative Error Rate

FFY	Number QC Reviews on Negative Actions	Number Valid	Number Invalid	% Valid
2008	44	40	4	91%
2009	22	21	1	95.5%

ME Targeted Case Review Sample

The payment accuracy case findings with copies of the Case Review forms (ISD 007) are on file in the addendum of this report. The case reviewed were from the ME payment accuracy lists, supervisor/case reader reviews and initial approvals. The following is a summary of the ME case review sample.

ME Case Review Sample

Total Reviews	Ethnic Breakdown	Cases with Potential Payment Errors Identified	Case Accuracy Rate
50	<ul style="list-style-type: none"> • Caucasian: 8 • Hispanic: 31 • African American: 2 • American Indian: 8 • Asian: 1 	4	92%

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Element	Total Number of Errors	Total % Error	Comment
Income	3	60.0%	Applicant paid semi-mo. 2x, PF6 shows EI anticipated using biweekly 2.15 conversion; OASDI amount on ISD2 from 2008; SE for HH needs clarification, entered on one screen, possible annualized EI; incorrect amount of TANF entered on UEI1 screen.
Deductions/Disregards	1	20.0%	Shelter expenses allowed when client does not claim any on recent application.
Household Composition	1	20.0%	SSN still not verified for HHM after 2 contacts.

Payment Accuracy Corrective Action

Based on the review elements in this area, the ME team has identified the above findings and/or trends. Income needs to be a targeted training area, particularly with follow-up on requested items on WYSNs when cases are expedited. It is necessary that case files be present at the time of any and all actions taken on a case. The importance needs to be reinforced with the entire staff.

County Response: This was discussed during a staff meeting on 7/15/09.

Supervisor Analysis

Based on the county error rate and requirement in ISD-GI 09-17, the management team is required to complete case reviews at Level I, which is 35 full case reviews, of which at least 20 must be reviewed prior to disposition. Below is an analysis of the case reviews completed for the months of April, May, and June 2009.

	Number of Supervisors	Number of Case Reviews Completed	Number of Case Reviews Prior to Disposition	Cases Identified with Potential payment Errors	Case Accuracy Rate
April	7	895	495	160	82%
May	7	664	439	131	80%
June	7	437	156	68	85%

Supervisory Review

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Based on the Supervisory Analysis Reports, the average number of cases reviewed per supervisor is 91 of which 51 cases are reviewed prior to disposition. Supervisors should be commended as this greatly exceeds the standard required.

Payment Accuracy Supervisor Sample

A sample of 60 cases was requested for review and all cases were provided and 50 cases were reviewed. SE Bernalillo County did have a Case Reader report during the review period therefore, the 50 cases reviewed were a combination of Supervisory reviews and Case Reader reviews.

- The Supervisor review sample identified 45 out of 50 cases. 95% of the supervisory reviews had no potential errors.
- In total reviewed cases, 7 cases contained deficiencies and 4 cases contained potential payment errors.

Payment Accuracy Supervisor and Case Reader Review Corrective Action

Corrective action is required for the purpose of correcting noted deficiencies; however, a corrective action **response** is **not** required on the deficiencies. A corrective action response is required on the potential payment errors.

- Case reviews of the supervisors indicate a payment accuracy rate of 82% as compared to the ME accuracy rate of 90% for this office which indicates they are effective in identifying potential errors in payment accuracy.

ME Negative Action Case Review Sample:

During the ME review, the ME team reviewed a random sample of 20 denials and closures of SNAP applications and cases. The negative case findings with copies of the Case Review forms are on file in the addendum to this report. The negative case accuracy rate is 95%. The error analysis for SE Bernalillo County negative case disposition reviews is as follows:

Total Reviews	Ethnic Breakdown	Negative Procedural Cases with Errors	Accuracy Rate
20	<ul style="list-style-type: none"> ◆ Hispanic: 11 ◆ Caucasian: 5 ◆ Asian: 2 ◆ Native Hawaiian: 1 ◆ Checkerboard Navajo: 1 	1	95%

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Case Name	Case Number	Findings	County Response	Review ME Response P & PDB
[REDACTED]	[REDACTED]	Application date 5/4/09, denial date 6/3/09, code 564. You have not provided the information necessary to determine your eligibility. Requested information provided on 5/12/09.	The county office does not agree with the ME finding. The client provided the requested ISD 408 Employment Verification form on 05/12/09. However, it was not correctly completed by the employer, it did not indicate how often the client was paid and the average number of hours worked per week (10 hours) was inconsistent with what the client had stated during the interview and the hours listed on 05/01/09 check stub (84 hours). Based on that information the county office could not make an accurate eligibility determination with incomplete and contradictory verification.	Finding Stands. Case should have processed with best available income provided from the consecutive past 30 days to application.

Negative Action Corrective Action

Based on the review elements in this area, the ME team has identified the above findings and/or trends.

Income Eligibility Verification System (IEVS) Security

This office does routinely receive the IEVS report for the SE Bernalillo County ISD office. A review of the procedures with the County Director indicates required compliance. No

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corrective action is required. The County Director should be commended for her compliance.

CLAIMS/RESTORATION PROCESS

Claims/Restoration Process Review

- The ME team reviewed sixteen QC error cases to evaluate the county office claims and restoration process. QC Review Finding forms with copies of the QC 071 (QC Findings) forms are on file in the addendum to this report. Action was taken appropriately on all the claims and/or restorations cases reviewed. The county office is to be commended on their Claims/Restoration processing.

Other Findings:

Record Location Review

QIS requested 119 case records for the management evaluation review. The county was able to locate 119 case records. The county office should be commended on their record management.

Program Access Initiatives

Each of the ISD field offices plays a primary role in achieving HSD goals for providing quality customer service, promoting accountability, and increasing program access. Noted program access initiatives in the SE Bernalillo ISD office include:

- The SE Bernalillo County ISD Office has several outreach projects. They have Medicaid staff at UNM, Pres., and AIDC that discusses SNAP benefits to all clients that they process Medicaid for.
- They work with MDC to get released inmates on SNAP as soon as they are released.
- They work with CYFD for juveniles being paroled to independent living situations to get SNAP.
- They work with Catholic Charities to serve all refugees in Bernalillo County.
- They work with Salvation Army and HCH to identify clients that qualify for SNAP.
- They go to some low income apartment complexes that have primarily elderly people living there and discuss SNAP and other benefits.
- The SE Bernalillo county office has streamlined their SR process. They now are bypassing the Pending Unit, with SRs going straight to the Processing Unit. With one worker reviewing and processing all SRs. If incomplete, the Incomplete SR form is mailed then the case routed to the Pending Unit awaiting the verification needed. This requires much less handling time of each case file, and fewer last minute SRs to be processed.

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CONCLUSION

With the exception of the deficiencies as noted in this report, the SE Bernalillo County ISD office is in compliance with the Department goals and ME requirements.

The county office management team must work together with the ROM to develop and implement a Corrective Action Response to correct the findings listed in this report. The Corrective Action Response must describe in detail each corrective action initiative, how each initiative will be implemented, who will monitor each initiative, and the monitoring schedule.

The County Director must provide a written response to this evaluation and provide corrective action initiatives for the ME findings.

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Addendum

Client Interview Forms

Community Organization Questionnaires

Staff Interview Form

Office Process Evaluation

Supervisor Analysis Forms

CD Interview Form

IRS Safeguard Inspection Evaluation

SE BERNALILLO COUNTY ISD

Case Review Summary

Please refer to the actual review form for a detailed description of each error

Case Name	Case #	Findings
1. [REDACTED]	[REDACTED]	Application/narrative documents client paid 2x a month/semi-monthly, 15 th EOM. PF6 in CR shows EI was anticipated using 2.15 conversion factor.
County Response:	The county office agrees with the ME finding. The client is paid semi-monthly and the income was updated using the correct conversion factor of 2. The case was corrected for the months of 05/09 – 08/09 and a \$37 supplement was issued for each month.	
ME Response P & PDB		
Finding changes from a Potential to a Deficiency due to the \$50 tolerance. Still a potential error in that if not corrected come October 1, 2009, this had potential findings.		
2. [REDACTED]	[REDACTED]	HHM's SSN not verified after more than 2 contacts. Personal wage records submitted with SR are for Nora. ISD2 shows EI/SE for Alberto and none for Nora. Possible SE for both; both would get EI deduction. Possible EI should be annualized.
County Response:	Sup 200 called the client on 07/22/09 and verified that the SS number on file for Yohana was incorrect; the correct SSN was updated and entered on ISD2. Also, the client verified that Nora is the only HHIM employed at this time; SE income was changed from Adaberto's EI screen to Nora's EI screen. No dollar error.	
ME Response P & PDB Finding stands. At time of review income was attributed to wrong HHIM and		

Case Name	Case #	Findings
enumeration was incorrect.		
3.	[REDACTED]	Wrong amount of TANF entered on ISD2. Due to receipt of TANF the most that can be counted for direct child support is \$50.00.
County Response:	[REDACTED]	The county office does not agree with the ME finding. Per the letter provided by the absent parent the \$300 he provides the client is a contribution and not child support. The county office reviewed the HGHI CSED screens and determined that the client does not currently have an active case with CSED and is not receiving the \$50 IVD pass through. Therefore, the county was correct in counting the \$300 monthly contribution towards the SNAP case until the client establishes a case with CSED. No dollar error.
ME Response P & PDB Finding stands. HH is receiving TANF; the contribution from AP is still considered CS. Due to the fact that HH is in receipt of TANF only \$50 can be considered as IVD disregard.		
4.	[REDACTED]	OASDI on ISD2 was taken from IHP99—2008 amount. No current HTPQ request/verification.
County Response:	[REDACTED]	The county office does not agree with the ME finding. Per the SDX and HTPQ scans completed on 05/28/09 the client receives \$810 in OASDI per month which is the same amount listed on the UEI screen. No dollar error.
ME Response P & PDB Finding stands. No recent HTPQ was found in CR at time of review.		
5.	[REDACTED]	Shelter expenses allowed when client does not claim any on recent application.
County Response:	[REDACTED]	The county office does not agree with the ME finding. Sup 200 called the client and verified by phone that he is responsible for \$150 rent and separate utilities. Although

Case Name	Case #	Findings
		<p>the client did not list his shelter and utility expenses on the application, the client informed the FAA during the interview that he was responsible for them. Per policy the county office accepted the client's statement. No dollar error.</p>
<p>ME Response P & PDB Finding stands. Application shows 0 for shelter costs, no documentation in CR to indicate client statement for Shelter costs at time of review.</p>		