

Appendix J. Document Review Guide

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Assessing SNAP Participants' Fitness for Work

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Document Review Guide

The document review involves a broad scan of publicly available and internal documents from the 50 States, the District of Columbia, the United States Virgin Islands, and Guam. Although FNS provides guidelines to States on how to make these determinations, they are interested in understanding how States implement those guidelines. The purpose of this document review is to review the documented policies, guidelines, and procedures States have for making fitness for work determinations.

This document presents guidance for reviewers on how to collect and record information from the documents reviewed and includes tips for searching for information efficiently. We anticipate that this guide will be a living document that will be revised as reviewers gain more experience.

The same reviewer should review all documents for each State. For each State, it is recommended that the following documents are reviewed in order:

- **SNAP program and policy manuals**
- **SNAP E&T State Plans**
- **Training materials and desk guides** for eligibility workers
- We will also review **State websites** for documents about State policies and procedures, such as memos and news releases. For example, many States have posted guidance on changes made to the program as a result of the coronavirus pandemic.
- **Other relevant documents** used to communicate policy changes or notices to SNAP staff and participants, such as state letters, notices, and forms. We will also review notices that States are currently required to provide to their clients about the work requirements they might be subject to.

We will also review the **FNS website for information on waivers** granted to States to temporarily waive the ABAWD time limit in the entire State or areas of the State with high unemployment rates or an insufficient number of jobs. As the notices on the FNS website contain information on waiver status by fiscal quarter, for all States that have the waiver, only one reviewer will be needed to review the information on ABAWD waivers. The study team will select a reviewer for this task after all data collectors are trained.

Information collected from the plans will be collected in an Excel database that will reside on a shared drive that all reviewers have access to. The information will be checked for quality and accuracy through the following ways:

- Two senior members of the study team will pilot the document review with publicly available documents from two of the selected case study states. They will review the documents, outline the relevant information that can be found in each document, and note areas where the document review process can be improved.
- The study team will conduct random spot checks of the information collected in the database when we have completed the document review and survey. The topics of some of the survey questions overlap with the topics in the document review. We will compare information collected from the document review with responses to the survey and will review the relevant documents again if there are discrepancies.

A. Overview of Document Review Process

This section lays out the document review process. These steps should be repeated for each State assigned to the reviewer.

The process for reviewing the documents will occur in two stages as some of the documents will not be publicly available. In the first stage, reviewers should identify publicly available documents from each State. In the second stage, we will conduct a review of the non-publicly available documents that States submit

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with their survey responses. Information collected from the plans will be collected in an Excel database that will reside on a shared drive that all reviewers have access to.

The Excel database contains the following spreadsheets:

- **Directory.** Each row should contain information for one State. In the columns, reviewers should add links to the documents identified for review.
- **Documents to Request.** Each row should contain information for one State. Reviewers should record which documents you are unable to find in the columns.
- **General Template.** Reviewers should use this template to record information for each State. Reviewers should add *new columns* for each document reviewed, while the rows should contain the data from the document review. Section B contains row-by-row guidance for filling in the template.
- **Questions Tracker:** Reviewers should use this spreadsheet for recording any questions you have about the documents you reviewed. Each row should be a separate question and the columns should include details about your questions.

The “General Template” should be used to record information from all the types of documents reviewed for a State, such that data will reside in one worksheet for each State.

Reviewing Publicly Available Documents

Step 1: Identify Links to SNAP Program or Policy Manuals

- Navigate to the spreadsheet in the Excel database titled ‘*Directory*’ (Directory). Each row represents a State, and you should fill in links to each type of document in the columns.
 - Add columns to the Directory if you find other types of relevant documents. Include the document title, a short description of the document, and specify if a particular section of the document contains relevant information.
- The Center for Budget and Policy Priorities’ (CBPP) review of each state’s SNAP web pages¹ is a good resource to consult. When you have identified the most updated SNAP Manual, save the link in Column D of the Directory, and enter the date the link was recorded in the column to the right.
 - Some links from the CBPP review may be broken or outdated. If the link does not redirect you to a working manual, search for the manual online. Some important notes to consider:
 - Not all States call their food assistance program “Supplemental Nutrition Assistance Program”. See Exhibit 1 for each State’s program name.
 - Reviewers can start by searching “[State name] [Program name] Policy Manual”.
 - However, States are not consistent in their use of terms such as “policy manual”. If no appropriate search results come up, try switching out “Policy Manual” for other common document titles.
 - Some States may have information about SNAP policies and procedures in a “Combined Policy Manual” or “Certification Manual” that also includes information on other State programs. If you find a manual like this, list which other programs are also included in the manual in Column G of the Directory.
 - Ensure that the policy manual you access goes through a live link with the State website as its root URL².
- If you are unable to find a manual online,
 - Enter ‘Not available online’ in Column D of the Directory.

¹ <https://www.cbpp.org/research/food-assistance/snap-online-a-review-of-state-government-snap-websites>

² Sometimes, Google’s search results may show direct links to PDFs of a State’s SNAP Manual. These often link to outdated PDFs, so check the data that the PDF was updated. If you cannot find information about when the PDF was published, do not review that document, and try a different search result instead.

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- o Enter 'SNAP Policy Manual' in the row corresponding to the appropriate State in the 'Documents to Request' sheet (see Exhibit 2).
- Indicate in Column F if the manual is searchable³. Enter 'Y' into the cell if the manual is searchable. If the manual is not searchable, enter 'N'. If you have any tips for how to navigate a manual, enter them in the same cell.

Exhibit 1. State Program Names

Program Name	States
Supplemental Nutrition Assistance Program (SNAP)	AK, AR, CO, CT, DC, GU, HI, ID, IL, IN, KY, LA, MA, MS, MN, MT, ND, NE, NJ, NM, NY, NV, OK, OR, PA, RI, SC, SD, TN, TX, UT, VI, VA, WV, WY
Food Supplement Program	DE, MD, ME
Food Stamp Program (FSP)	GA, MO
Food Assistance Program	AL, FL, IA, KS, MI, NH, OH
Nutrition Assistance	AZ
CalFresh	CA
Food and Nutrition Services	NC
3SquaresVT	VT
Basic Food	WA
FoodShare	WI

Sources: <https://www.fns.usda.gov/snap/state-directory>, <https://www.cbpp.org/research/food-assistance/snap-online-a-review-of-state-government-snap-websites>

Step 2: Identify Other Publicly Available Documents

- Reviewers should search for the other types of documents online and save links to the documents in the appropriate column in the Directory. Below are some suggestions for how to search for each document⁴.
 - o *SNAP E&T State Plans*: FNS will provide the State E&T Plans prior to the document review.
 - o *Training materials and desk guides for eligibility workers*: Search for “[State name]”, “[Program name]”, “training”, “materials”, “eligibility”, “workers”.
 - o *State websites*: Navigate to the State SNAP website from the FNS State Directory⁵.
 - The CBPP review may link to other publicly available State resources regarding SNAP, including State websites. If the State webpage looks like it contains relevant information about SNAP policies and procedures, copy the link to Column G. At this stage, reviewers should conduct an initial scan of the website to identify

³ This means that the SNAP manual is in the form of a searchable database with a list of contents and an easy-to-use search engine that provides detailed search results.

⁴ These suggestions are not exhaustive, and reviewers can try variations of suggested search terms. It is fine to move on if you are unable to find a document after multiple tries. Not all documents will be publicly available online. See the instructions for what to record if you are unable to find a document.

⁵ <https://www.fns.usda.gov/snap/state-directory>

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where States may post resources and updates about SNAP policies and procedures, such as memos and news releases.

- If you are able to identify a more appropriate webpage where States post the above-mentioned information, copy the link to Column G of the Directory. Otherwise, copy the link to the general State SNAP website.
- *Other relevant documents* could include state letters, notices, and forms relating to SNAP work requirements. Prioritize searching for documents used to communicate policy changes or notices to SNAP staff and/or clients⁶.
 - Include a search for “[State name]”, “[Program name]”, “participant”, “client”, “work”, “requirement”, “notice”.
- If you come across a document with relevant information but you are unsure what type of document it is, save the link to the document in Column H of the Directory. Include the document title and a short description of the document.
- If you are unable to find a document online, enter ‘Not available online’ in the appropriate column.
 - In the ‘*Documents to Request*’ sheet, record the document title (see Exhibit 2).

Exhibit 2. Documents to Request

	Document 1 Type	Document 2 Type
AL	<i>E.g., Training materials for eligibility workers</i>	
AK		
AZ		

Step 3: Review Document

It is recommended that the reviewer goes through the documents in the order below. If any of the documents are not available during Stage 1 of the document review, move on to the next document on the list.

- SNAP program and policy manuals
- SNAP E&T State Plans
- Training materials and desk guides for eligibility workers
- State websites
- Other relevant documents

The reviewer should download a copy of the “General Template” and work offline. The “General Template” should be used to record information from all the types of documents reviewed for a State, such that data will reside in one worksheet for each State. Section B contains detailed guidance for filling in the template. Refer to Section C for more tips on navigating each document.

When you have completed the review of all publicly-available documents, upload the spreadsheet to the shared Excel database, following the naming convention “[State name]_[Reviewer’s initials]”.

Step 4: Record Any Outstanding Issues

- If you have a question about the information you have recorded, highlight the cell red.
- Record your question in a new row on the ‘Questions Tracker’ sheet. Include your name, the State you were assigned to, the type of document you encountered an issue with, and your question.

⁶ If, on your first search, you are unable to find any relevant documents easily, try searching again after completing the review of the State’s SNAP policy manual and SNAP E&T Plan. Narrow your search by looking for information that you have not already found.

We expect that these documents may be on an internal website or server and not accessible to the public. We expect to request any relevant internal documents from State agencies when we field the survey

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Reviewing Non-public Documents

This section will be updated to include additional guidance as reviewers gain experience conducting the reviews of non-public documents.

Reviewers should enter information into the same spreadsheet used for reviewing a State's publicly available documents. If reviewers find that many States structure a particular type of document similarly, we will consider updating the template used for conducting the review or creating additional templates.

B. Using the General Template

Below are some general guidelines for reviewers:

- If you are conducting this document review for the first time, it may be helpful to first look through Section C, Tips for Navigating Documents.
- If you are unable to find information, enter "N.A." in the column you are unable to fill. Check that all the columns are filled in when you complete the review of a document.
- State policy manuals and plans often refer to information in other documents. If there is relevant information which is described in another document, add the document to Column H of the Directory.
 - Sometimes, documents refer to specific statutes or regulations without including the text in the body of the document. If there is a particular section of a State's regulation or other code that should be reviewed, add the code number to Column H of the Directory.
- When reviewing SNAP policy manuals, using the row headings as search terms may be a good way to search the manual more efficiently. We expect that policy manuals will contain most of the buckets of information that we are interested in.
- When reviewing other documents, using the search terms listed below might be a good way to narrow your search. However, it is likely that not all documents will contain all the information that we are interested in.
 - Screening", "eligibility", "fit for work", "unfit for work", "work requirement", "mental", "physical", "limitation", "exempt*", "determin*", "assess*", "appeal", "hearing", "good cause", "fitness", "work regist*", "ABAWD", "employment and training", "timeframe"

The rest of this section provides row-by-row guidance for entering information into the **General Template**. The bulleted list below corresponds to the order of the rows in the spreadsheet. If you select the "Other" option from a dropdown list, please include a description in the same cell. For each document you review, record information in a new column in the same spreadsheet.

Document Information

- *State*. Select the State that you are reviewing documents for.
- *Document Title*. Record the title of the document in full.
- *Type of document*. Select the type of document from the drop-down list: SNAP policy manuals, SNAP E&T State plans, Training materials and desk guides for eligibility workers, State website, or Other.
- *Other languages*. If document is available in other languages, list the other languages. Otherwise, enter "N.A."
 - We expect that this will apply primarily to notices and forms for SNAP participants with limited English proficiency.
- *Last updated*. Record the month and year the document was last updated (if available).

General exemption criteria

- *Description*. Summary of the exemption criteria for general work registrants

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- o If available, it is fine to copy and paste the relevant exemption criteria from the document
- *Page*. Record which page number(s) of the document the information can be found on.
- *Regional variation*. Select from a dropdown list: None (Statewide)/ County / Other: [specify level of jurisdiction].
- *Source of policy*. Select all that apply from a dropdown list: Statute/ Regulation/ Other: [specify]
- *Code section number*. If relevant, cite the section of the State regulation code or other relevant code that the policy was derived from (e.g., Washington Administrative Code 388-444-0005)
- *Date implemented*. If available, record the date that the policy or procedure was implemented using the format MM/DD/YYYY.
- *Most recent change*. If available, record the date that the policy or procedure was most recently modified using the format MM/DD/YYYY.

Exemption criteria for ABAWDs

- *Description*. Summary of the exemption criteria for ABAWDs
 - o If available, it is fine to copy and paste the relevant exemption criteria from the document
- *Page*. Record which page number(s) of the document the information can be found on.
- *Regional variation*. Select from a dropdown list: None (Statewide)/ County / Other: [specify level of jurisdiction].
- *Source of policy*. Select all that apply from a dropdown list: Statute/ Regulation/ Other: [specify]
- *Code section number*. If relevant, cite the section of the State regulation code or other relevant code that the policy was derived from (e.g., Washington Administrative Code 388-444-0005)
- *Date implemented*. If available, record the date that the policy or procedure was implemented using the format MM/DD/YYYY
- *Most recent change*. If available, record the date that the policy or procedure was most recently modified using the format MM/DD/YYYY

Expected Exemptions from Work Requirements

This information is typically found in States' SNAP E&T Plans.

- *Description*. List State's planned exemption categories for the fiscal year that the E&T plan was submitted for
- *Number exempt*. List each planned exemption category and the anticipated number of household members that will be exempt, using the format [Category]: [Number of household members anticipated to be exempt]. Separate each category with commas.
- *Page*. Record which page number(s) of the document the information can be found on.

Process for making fitness for work (FFW) determinations

- *Who makes FFW determinations?* Select all that apply from a dropdown list: Case managers/ Eligibility workers/ Other: [specify]
 - o These terms may not be used consistently across all agencies. Eligibility workers are sometimes referred to as financial workers. Case managers may also be referred to as employment specialists, career advisors, etc. Consider the role of the staff member referenced in the document and select the term from the list that is most consistent with their role.
- *Timing of determination*. Include information such as:
 - o At what point in the certification process is the FFW determination made?
- *Page*. Record which page number(s) of the document the information can be found on.
- *Source of policy*. Select all that apply from a dropdown list: Statute/ Regulation/ Other: [specify]
- *Code section number*. If relevant, cite the section of the State regulation code or other relevant code that the policy was derived from (e.g., Washington Administrative Code 388-444-0005)
- *Does guidance address different process for in-person or remote applications?* Select Yes/No

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- *Is process different for in-person v. remote applications?* Indicate Yes/No
- *In-person application process.* Copy and paste the text that describes the in-person application process (with regards to fitness for work determination)
- *Remote application process.* Copy and paste the text that describes the remote application process (with regards to fitness for work determination)
- *Does the written guidance address standard operating procedures for staff making fitness for work determinations?* Indicate Yes/No
- *Standard Operating Procedures (SOP).* Summary of staff SOP for making fitness for work determination
 - If you have identified a standalone document that lays out the SOP for staff, add a note referencing that document. If so, there is no need to summarize information related to SOP from another document, such as the SNAP manual.
- *Does the written guidance address if staff can deviate from the SOP?* Indicate Yes/No
- *Allowable deviations from the SOP.* Summary of situations when staff can deviate from SOP
- *Are initial FFW determinations reviewed?* Indicate Yes/No
- *Who reviews initial FFW determinations?* Select from a dropdown list: Eligibility supervisors/ Quality Insurance staff/ Other: [specify]
- *Timing of review.* At what point are individuals' fitness for work determinations reassessed? Select all that apply from a dropdown list: When individuals recertify their benefits/ When a good cause determination is made/ Based on initial medical assessment/ When determined to be exempt from mandatory E&T/ When an ill-suited determination is made by E&T staff/ When requested by an individual/ Other: [specify]

Verification required for making FFW determinations

- *What types of mental or physical limitations do SNAP staff need to verify?* Select all that apply from the dropdown list: Mental illness/ Physical illness/ Physical disability/ Homelessness/ Cognitive or developmental disabilities/ Other: [specify]
- *What information is required for verification?* Describe what information is required to verify each physical and mental limitation selected in the row above
- *Page.* Record which page number(s) of the document the information can be found on.
- *Code section number.* If relevant, cite the section of the State regulation code or other relevant code that the policy was derived from (e.g., Washington Administrative Code 388-444-0005)

Appeals process

- *Does the written guidance for staff address the appeal process for FFW determinations?* Indicate Yes/No
- *Are appeals of fitness-for-work determinations allowed?* Indicate Yes/No
- *Is the appeals process the same for all SNAP participants?* Indicate Yes/No
- *Page.* Record which page number(s) of the document the information can be found on.
- *Who makes the final determination on an appeal?* Select from dropdown list: Case managers / eligibility workers/ Supervisor/ Appeals specialist/ Other: [specify]

Criteria for good cause determinations

- *Criteria.* List the allowable reasons for good cause.
- *Are there reasons for good cause that could lead to a re-assessment of a participant's work requirements?* Indicate Yes/No
- *Which reasons for good cause could lead to a redetermination of a participant's fitness-for-work?* List all reasons which could lead to a redetermination.
- *Page.* Record which page number(s) of the document the information can be found on.
- *Code section number.* If relevant, cite the section of the State regulation code or other relevant code that the policy was derived from (e.g., Washington Administrative Code 388-444-0005)

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Process for making determinations around good cause for failure to comply with work requirements

- *Who makes good cause determinations?* Select from dropdown list: Case managers/ eligibility workers/ Other: [specify]
- *SOPs.* Does the written guidance include SOPs for staff making determinations that someone has good cause for not meeting work requirements? Indicate Yes/No
- *Description of SOPs.* Description of SOPs for staff making good cause determinations
 - If we have a separate document that is the SOP, add a note referencing that document. If so, there is no need to summarize information related to SOP from another document, such as the SNAP manual.
- *Does the written guidance describe if staff are allowed to deviate from the SOP?* Indicate Yes/No
- *Allowable deviations from the SOP.* Describe situations where staff are allowed to deviate from SOPs
- *Are good cause determinations reviewed?* Indicate Yes/No
- *Who reviews good cause determinations?* Select from a dropdown list: Eligibility supervisors/ Quality Insurance staff/ Other: [specify]
- *Timing of review.* When are good cause determinations reviewed?

Administrative Structure of SNAP E&T Program

This information is typically found in States' SNAP E&T Plans

- *Is the SNAP E&T program state-administered, or county-administered?* Select from a dropdown list: State/ County
- *Summary.* Copy and paste the text from the State E&T plan which provides a summary of the E&T program.
- *Mandatory or Voluntary.* Does the State operate a mandatory or voluntary SNAP E&T program? Select from dropdown list: Mandatory/ Voluntary
 - See Appendix for list of States that run mandatory SNAP E&T programs.
- *Page.* Record which page number(s) of the document the information can be found on.

Screening Process for SNAP E&T Program

This information is typically found in States' SNAP E&T Plans.

- *Description.* Summary of the screening process States use for making referrals to their SNAP E&T program
- *(Only for mandatory E&T States) Which SNAP participants are required to participate in mandatory E&T?* If included in the written guidance, list which groups of SNAP participants are required to participate in mandatory E&T.
- *Regional variation.* Select from a dropdown list: None (Statewide)/ County / Other: [specify level of jurisdiction].
- *Page.* Record which page number(s) of the document the information can be found on.

Changes due to COVID-19

- *Changes due to pandemic.* Does the document contain written guidance about policy or procedural changes that were made because of COVID-19? Indicate Yes/No.
- *Summary of changes.* Summarize changes that were made due to COVID-19
- *Page.* Record which page number(s) of the document the information can be found on.

C. Tips for Navigating Documents

This section includes tips for navigating each type of document and the information that we anticipate reviewers will be able to find. Reviewers should update the guidance in track changes as you learn what works best from conducting the reviews.

SNAP Program and Policy Manuals

Reviewers should refer closely to the template. As the policy manuals are likely to contain a lot of information about the State's SNAP policies, using the row headings as search terms may be a good way to search the manual more efficiently.

We expect that States' policy manuals will contain some written guidance on most of the topics included in the "General Template" but may not describe processes and standard operating procedures for SNAP staff in detail.

When filling out the fields for "Date implemented", note that States sometimes include when each section was last updated (e.g., Minnesota, in the top right-hand corner of each section) and/or when the entire manual was last updated. When filling out the fields for "Most recent change", check if there is information at the beginning or end of the manual. Some States maintain a record of all changes to the text in the manual.

Training Materials and Desk Guides

Reviewers should try the suggested search term, but we do not expect that these documents will be publicly available for many States.

Reviewers should update this guidance in tracked changes as we review more documents of this type.

SNAP E&T State plans

States are required to submit to FNS a SNAP E&T plan annually to receive reimbursement for E&T activities. FNS requires States to include certain information in the SNAP E&T plans and provides an optional template for States to use⁷.

If States appear to be using the template in their plans, the relevant information should be found in the following sections:

- Section C, I is a summary of the SNAP E&T program. This should include information about the administrative structure of the program; how it varies across the state; and whether the State operates a mandatory or voluntary program, or a mandatory program just in part of the state.
- Section C, VII should include a description of the screening process States use to identify whether work registrants should be referred to SNAP E&T programs.
- Section F should include information on the planned State option exemption categories, and the anticipated number of SNAP household members exempt from work registration during the federal fiscal year.
 - As noted by OET, States often do not break down the reason for work registration exemptions in the E&T plans, but it does not hurt to look.

Otherwise, reviewers can try the following search terms: "administ*", "mandatory", "voluntary", "screening", "exempt*", "work registrant", "registration", "appeal".

⁷ The template is linked here <https://www.fns.usda.gov/sites/default/files/snap/SNAP-ET-Plan-Template.docx>.

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State websites

If the documents available on State websites contains information that is already clear to you from the policy manual and State E&T plans (e.g. exemption criteria), reviewing them is a lower priority. Many are targeted at SNAP applicants and recipients and may be repetitive.

States often post memos and releases when they implement program changes. For example, guidance on program changes because of the coronavirus pandemic may be posted on the State websites. Gathering such information is a high priority.

FNS websites on ABAWD waivers

The FNS website maintains information about the waivers granted to States to temporarily waive the ABAWD time limit in the entire State or areas of the State with high unemployment rates or an insufficient number of jobs⁸. The website lists information on States' waiver status by fiscal quarter.

A reviewer should record each State's waiver status, in Column C of the Directory, during the fiscal quarter when the survey is fielded. Select from the dropdown list, which will have the options "Statewide" (select for State and Territories approved for Statewide ABAWD time limit waivers), "Partial" (select for States approved for partial ABAWD time limit waivers), and "None" (select for States and Territories without ABAWD time limit waivers).

Other documents

Reviewers should try searching for other documents used to communicate policy changes or notices to SNAP staff and participants, such as state letters, notices, and forms. However, we expect that many of these documents may be on an internal website or server and not accessible to the public.

⁸ The webpage can be found here <https://www.fns.usda.gov/snap/ABAWD/waivers>.

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Appendix

Based on information received from FNS on 3/1/2021 and updated on 4/1/2021, the following States have partially mandatory SNAP E&T programs:

1. NJ
2. ND
3. OH
4. NY
5. FL
6. MS
7. ID
8. TX

Utah is the only State that operates a solely mandatory program.