Navigating SNAP transformation in a postpandemic world

Supplemental Nutrition Assistance Program (SNAP) Administrators are tasked with the daunting but rewarding responsibility of delivering accurate and efficient food and nutrition assistance. The recent surge in demand for SNAP benefits, coupled with downward trends in application processing timeliness and payment accuracy, intensifies the pressure faced by SNAP Administrators nationwide.

The postpandemic world of SNAP reinforces the need for thoughtful and innovative strategies to chart a course for sustained success. States and federal partners have a unique opportunity to embrace change, reevaluate their delivery strategy, and work toward timely and accurate SNAP delivery.

A new world: postpandemic SNAP

In this postpandemic era, SNAP households contend with historically high food costs, rapidly evolving cost-of-living standards, and uncharted labor markets rife with non-traditional employment opportunities.[1] Half-century old policies and program performance metrics that prioritize payment accuracy over program access are hampering SNAP Administrators as they attempt to keep up with these ever-evolving factors.

The increasing disparity between program demand and program delivery is intensified as states confront the reality of an increasingly remote workforce and widespread staff reductions. While striving to move past the pandemic, food insecurity remains on the rise, placing SNAP at the forefront of the public health discussion.[2] It is crucial that states, localities, federal partners, and the vendor community collaborate to pave a way for sustained success.

Battling headwinds: postpandemic SNAP performance

As the reality of the postpandemic world sets in, states are finding it challenging to meet key SNAP performance benchmarks. During the pandemic, the US Department of Agriculture (USDA) Food and Nutrition Service (FNS) provided relief to states through temporary waivers that relaxed application and case processing policies and through the suspension of quality control and payment error rate (PER) reporting through 2021.[3] As these waivers expire and SNAP performance reporting resumes, the latest reporting data reveals that the postpandemic SNAP landscape is markedly different than before.

On February 8, 2024, USDA Secretary Tom Vilsack sent letters to 46 governors, including those of Guam and the Virgin Islands, and the mayor of Washington, D.C., expressing concerns about the downward trend in three key SNAP benchmarks since prepandemic reporting. In fact, these negative trends are evident nationally across all three benchmarks.[4]

Downward trends in SNAP program delivery (FY19-FY22)[5]

Payment Error Rates (PER)

- Rose for 15 US states, resulting in inaccurate benefits being issued.
- PER is a measure of how accurately a state agency determined SNAP eligibility and benefit amounts for those who participate in SNAP.
- PER is an aggregate of the overpayment rate and underpayment rate.

Application Processing Timeliness (APT)

- Dropped for 36 US states, two US territories, and the District of Columbia by an average of 10 percent, resulting in longer waits for applicants over the 7-and 30-day benchmarks.
- APT is a measure of the timeliness of a state's processing of initial applications.
- This metric is calculated by the number of applications approved on time out of the total number of applications received.

Case and Procedural Error Rates (CAPER)

- Rose nationally from 34.1 percent in FY19 to 44.12 percent in FY22, resulting in inaccurate closures and terminations.
- CAPER assesses the accuracy of state agency actions in cases in which applicants were denied, terminated, or suspended and did not receive benefits.
- A case and procedural error occurs when a state takes one or more incorrect actions when terminating a household's SNAP benefits.

Charting a new course for SNAP program delivery

States have the opportunity to course correct and improve performance benchmarks by exploring transformational strategies with respect to the people and process, technology, and data strategy and reporting elements of their current-state SNAP delivery models.

The following table presents potential high-impact transformational strategies across the dimensions of people and process, technology, and data and reporting. Each strategy aims to address SNAP performance benchmarks head-on. By localizing many of the strategies to state-specific programmatic needs and goals, states can realize tangible benefits based on experiences from other states and localities.

People and process	Technology	Data and reporting
Reimagining the SNAP application	**Enhancing case management**	**Leveraging data-driven insights**
Meeting applicants where they are with on-demand interviews (rather than scheduled interview appointments) to improve SNAP application timeliness and reduce churn. **Applying human-centered design** principles to the application intake screen flow to reflect the natural flow of the interview and reduce payment errors that result from erroneous manual and duplicative data entry. **Reducing hand-offs** throughout the application process between the front office and back office to eliminate inefficiencies and improve timeliness.	**Exploring emerging technologies** (automation, AI) to reduce the time spent on error-prone and time-consuming tasks such as capturing income information and household relationships in case management and eligibility systems which tend to drive payment errors. **Increasing self-service options** through the use of a client-facing portal, digital kiosk stations, and electronic document submission options to improve overall client and worker experience, resulting in faster and more accurate benefits management and a more efficient workforce. **Integrating with more national wage and salary data sources** to reduce redundancies in income verification and to improve payment accuracy.	**Identifying actionable insights** from application and case-level reporting, including denials, error-prone case compositions, and application churn to drive targeted compliance strategies. **Assessing and validating federal reporting requirements** on timeliness, payment errors, application churn, etc. against the data captured in one's case management and eligibility system. **Collaborating cross-functionally** with appeals, claims, and other programs for insights to drive greater program coverage, stronger program integrity, and more seamless federal reporting.

Table I: Examples of change across the three dimensions of people and process, technology, and data and reporting.

Making headway: state efforts to date

Some state and local governments have already begun to move the needle in enhancing overall client experience and agency efficiency. In our experience, for one locality, the transition from agency-scheduled interviews to client-driven 'on-demand' interviews has reduced recertification denials by as much as 10 percent, reducing churn and improving program coverage. In other jurisdictions, clients are increasingly able to upload verification documentation via mobile or self-service kiosks, enabling front-office staff to focus on triaging client questions.

Further spotlighting innovative thinking, in our experience, states that have implemented 'no-touch' application registration have seen up to 95 percent of self-service portal submissions bypass the manual intake to route directly to caseworkers. Additionally, with an eye to increasing participation, states are pursuing increased partnerships and engagement with community organizations to help bridge the educational gap between local SNAP agencies and communities. However, the onus does not lie solely with states; FNS must play an active role in effectuating a course-correction on a national stage.

Changing track: what FNS can do to support states

Collaboration between FNS and states is vital to the success of postpandemic SNAP delivery. States will look to FNS to take the lead on revisiting SNAP policies, procedures, and compliance metrics in the following areas:

- Further streamlining waiver and application processes for the use of emerging technologies, such as AI and robotic processing automation, and promoting successful use cases.[6]
- Reimagining antiquated SNAP policies that have not kept pace with emerging technologies and core program objectives over time.
- Driving timely waiver review and approval.
- Increasing partnerships with states through expanded use of Process and Technology Improvement Grants.

Let's navigate SNAP change, together

At KPMG, we aim to think big while understanding that progress is often made in increments. Whether it is leveraging data to drive actionable insights or exploring emerging technologies, we are ready to help you achieve your future goals. As you adjust your course due to new program realities, KPMG is here to help you think creatively, plan intentionally, and successfully deliver on your objectives.

We are proud to support states in their journey by providing Transformation Advisory Services (TAS). We maintain a suite of TAS services, specifically tailored for SNAP transformations, which intends to support states across the enterprise transformation journey continuum, from planning and strategy to cost benefit analysis and federal funding, technology modernization, and compliance and reporting. Our approach helps guide the prioritization and implementation of program delivery changes to meet the nutritional needs of those in need. Let's chart a course for SNAP changes, in this postpandemic world, together.

Sources

1. The Wall Street Journal. (2021, June 1). It's been 30 years since food ate up this much of your income. https://www.wsj.com/economy/consumers/its-been-30-years-since-food-ate-up-this-much-of-your-income-2e3dd3ed
2. Center on Budget and Policy Priorities. (2021, June 9). Food Insecurity at a Two-Decade Low for Households with Kids, Signaling Successful Relief. https://www.cbpp.org/blog/food-insecurity-at-a-two-decade-low-for-households-with-kids-signaling-successful-relief
3. Center on Budget and Policy Priorities. (2020, July 30). Most States Are Using New Flexibility in SNAP to Respond to COVID-19. https://www.cbpp.org/research/food-assistance/most-states-are-using-new-flexibility-in-snap-to-respond-to-covid-19
4. US Department of Agriculture, Food and Nutrition Service. (2024, February 8). Governor Letter on Performance and Operations. https://www.fns.usda.gov/snap/governor-letter-performance-operations
5. USDA Food and Nutrition Service. (n.d.). Efficiency and Effectiveness Measures. (2021, August 12) https://www.fns.usda.gov/snap/efficiency-effectiveness-measures
6. US Department of Agriculture, Food and Nutrition Service. (n.d.). Advanced Automation. https://www.fns.usda.gov/snap/advanced-automation

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