

**A METHOD OF USING QUALITY ASSURANCE REVIEWS
FOR PROGRAM IMPROVEMENT**

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INTRODUCTION

The Special Nutrition Programs (SNP) section of the Texas Department of Human Services (TDHS) administers the United States Department of Agriculture (USDA) Child and Adult Nutrition Programs in Texas. Example of these programs are the National School Lunch Program (NSLP), the School Breakfast Program (SBP), the Special Milk Program (SMP), and the Child and Adult Care Food Program (CACFP).

The SNP contracts with representatives of facilities which provide educational, social, and/or health services such as private schools, residential child care institutions, child care centers, child care day homes, and adult day care centers, to provide healthy nutritious meals to their participants. The SNP ensures that the meals provided are in accordance with menu planning patterns established by USDA. In return, the contractors are reimbursed for the meals in rates commensurate with the family income of the children and/or adults they feed.

SNP FIELD OFFICES

To effectively and efficiently implement the federal and state policies and regulations governing the Child and Adult Nutrition Programs throughout Texas, the SNP central office has eight field offices in different regions of Texas. The field offices are located in Austin, San Antonio, Fort Worth, Pharr, Lubbock, El Paso, and Lufkin. These offices maintain closer contacts with the local communities and are able to manage the SNP contracts through face to face and on site visits to the contracting facilities in their regions. The field offices' responsibilities include processing contract applications, conducting periodical reviews to make sure that the policies and regulations governing each of the SNP programs are implemented as intended, and preventing overclaim and fraud.

QUALITY ASSURANCE REVIEWS OF THE FIELD OFFICES

In 1997, the SNP central office outlined a formalized process of conducting quality assurance (QA) reviews of the field offices. The main purpose of the QA reviews was to have a process that would ensure the integrity of the SNP programs and be a source of program improvement. Five goals were recognized for the quality assurance review process, they are to: (a) ensure program compliance, (b) achieve program consistency and standardization, (c) detect policy and/or procedure development requirements, (d) identify training and technical assistance needs, and (f) relate necessary individual office corrective actions.

METHOD OF CONDUCTING THE QA REVIEWS

Three Program Analysts conduct the QA reviews of the SNP field offices, at least once a year, in accordance with the outlined QA review process developed by the SNP. The following method was used to conduct QA reviews for The NSLP/SBP, the SMP, and the CACFP - Adult Day Care Centers application processing by the eight field offices.

Area for QA Reviews

The areas outlined for the QA reviews were the core areas of the field offices activities, namely, application processing, contract approval, contract monitoring, contract maintenance, and office management systems. For example, application processing involves dissemination of applications to new and renewing contractors within specified time limits. Applicants are required to complete forms that identify their food services management plans and submit documents that prove their tax exempt status and satisfy licensing requirements. Contract monitoring involves periodic reviews of contractors and their facilities to ensure that the contractors manage the SNP in accordance with policies and procedures specified in program handbooks, policy notices, and procedure bulletins. Monitoring also is a chance to provide contractors with needed technical assistance and help them develop and follow corrective action plans.

Criteria for the QA Reviews

Criteria were established for each of the identified area of activity. Some of the criteria to ensure the quality of application processing were if the application logs are accurate, if the applications are processed within the time limits established by program policies, if all documents that are required to approve an application are in file, if these documents and application forms are complete and accurate, if the proper entity of the applicant is well established by documents such as the Internal Revenue Services tax exemption documents and articles of incorporations, if the information on the application forms are reported accurately to the financial section of the SNP to ensure error free claim processing, and if applicants are offered adequate technical assistance from the field office to facilitate their application.

Documents Reviewed

Documents that are necessary for the QA review were specified in order that the field offices keep these documents at hand during the QA reviews. Example of these documents are contract files, office work plan, and application and appeals logs. Stratified samples of the NSLP/SBP, SMP, and CACFP - Adult Day Care Centers contract files were selected at random to include new and renewed contracts with different types of facilities. Selection of the samples was conducted during the QA review visit.

Scope of the QA Reviews

For effective and in depth QA reviews it was recommended that only one or two areas of the field offices' activities were examined in each of the eight field offices. As mentioned above, the QA review was conducted on application processing and the technical assistance provided to the potential contractors to facilitate their applications.

Entrance and Exit conferences

Entrance conferences were conducted before, and Exit Conferences after, the QA reviews. During the Entrance conference, the purpose and extent of the review were discussed with the office staff and a contact person was specified to facilitate the use of office documents and facilities. During the Exit conference the findings of the QA reviews were discussed and clarifications were provided. Additional information and/or documentation were exchanged between the reviewer and the office staff.

QA Review Reports

A report containing the results of the QA review was developed for each field office within 30 days of the QA review. Each report included suggestions for improving program integrity, issues in policies and regulations, and commendations on the office's areas of strength. Unique and innovative practices were noted and encouraged. The reports were submitted to the SNP Director and subsequently to the Operations Manager who forwarded the report of each field office to the APM of the office. The APM was required to submit a corrective action plan to the SNP Director, in consultation with the Operations Manager, within 30 days of receiving the report.

Summary of Findings - Good Practices

After conducting QA reviews of the eight field offices a summary of the good practices and innovations observed in the offices was developed. The summary was shared with the SNP Director, the Operations Manager, and the field offices. This was intended to encourage the field offices to continue to improve their practices and to benefit from each others experiences and creativity. Examples of the good practices noted in some field offices are:

- C Setting a section in each file for forms related to facilities separate from the section for forms related to the contractor. This is effective in cases where the contractor manages several facilities for it would facilitate tracking the documentation specific to each facility.
- C Providing face to face and on site technical assistance to new applicants to ensure that they fully understood program requirements.
- C Implementation of an open door policy that enables any applicant to visit the office without a prior appointment, to be helped with application completion and to expedite application processing.
- C Pro-active involvement in the community and coordination with related organizations such as the Day Activity and Health Services program for adults and the Independent School Districts to help applicants find sources for adequate meals and cycle menus, and help them obtain the required application documents.
- C Developing a brochure on SNP services and distributing it in meetings with officials responsible for other social service benefits to promote participation in the SNP.
- C Developing training materials with flow chart illustrations to train staff on procedures for application processing.

Summary of Findings - Issues

The issues raised during the QA review visits or as the result of the reviews were listed and discussed with the Operations Manager and the policy and financial sections of the SNP. The underlying assumption is that irregular or inconsistent application of policy stems from vague policies, imprecise procedures, and/or a need for training and technical assistance. These issues were used as a forum to clarify policies and procedures, to improve program integrity, to identify training needs, and to streamline the implementation of policy and procedures in the field offices. Examples of some of the issues that were raised and how these issues were resolved are:

Issue: It is not clear if the mandated certificate of training for the CACFP-ADC is granted to organizations or to individuals, and if future certificates will list the name of the organization rather than the name of the individual who attended the training. If the individual who attends the training is no longer associated with the organization will the certificate of training remain valid?

Resolution: From now on, certificates of training are granted to organizations. If the individual who attends the training is no longer associated with the organization the certificate of training remains valid.

Issue: It seems reasonable to have a new and complete CACFP-ADC application packet for new applicants and a brief application packet for renewing contractors, similar to the other components of the CACFP.

Resolution: It was decided that the ADC Policy Specialist will develop the necessary forms for a renewal packet and the Program Analyst will develop the two separate packets.

Issue: It is not clear in which cases the Historically Underutilized Businesses forms need to be completed.

Resolution: The Program Analyst responsible for the general forms provided this information. Brief instructions on who completes the forms were incorporated in the application packet.

Issue: In the NSLP/SBP commodity contracts the entity of the contractor is not checked by the field offices to make sure that it is the same entity that is contracting for the school lunch. Thus it is possible for a school or a Residential Child Care Institution to receive commodities without participating in the NSLP, which is against policy requirement. There were instances where the contractor's name on the commodity contract was different from the name of the contractor for the school lunch program.

Resolution: The Field offices need to check the entity on the commodity contract and alert Food Distribution if the entity on the commodity contract is different from the entity of the NSLP/SBP contractor.

Issue: Some APMs feel that the Application Checklist for Review and Incomplete Letter (ACRAIL) is only a tool for processing applications and it should not become a document in itself to be checked for accuracy and completion.

Resolution: An erroneous check on the ACRAIL could and did lead to an erroneous application processing. ACRAIL will remain a part of applicants files and its accuracy remains a standard for QA reviews.

- Issue:** Some APMs are under the impression that the full name of the authorized representative is not needed for the input document since the software used for entering the data taken from the input document does not include an entry for the first name.
- Resolution:** This is true. The software data field used to enter the name of the authorized representative from the input document accepts the entire last name of each authorized representative. Only the first 4 letters of the complete last name, however, are acknowledged on the edit to validate an acceptable signature.
- Issue:** Some field offices feel that the attendance factor data items on the input document are not necessary since the Financial Section asks the field offices to fax the sheets and enter the data directly from the sheets.
- Resolution:** This is true. Financial prefers faxing the sheets to updating the input document with the data and faxing the input document.
- Issue:** Applications are processed all year-long. Currently the APMs are required to change their work plans each time they accept new applications to reflect a similar increase in the number of reviews they conduct. This way the APMs are not able to develop a yearly work plan and the contract managers work loads doubly increase whenever they are successful in their outreach efforts; once by processing more applications and another time by conducting more reviews. Is it possible to develop a yearly work plan at the beginning of each year based on the number of contracts that are managed by each office at that time?
- Resolution:** The APMs can base their review plans on projected rather than actual number of contracts for the year. Then depending on how many more contracts they actually get they can substitute the contracts scheduled for review from "Good to Review" to "Necessary to Review" since they always review more contracts than necessary.

LESSONS LEARNED

Making Sure the Findings are Valid

The QA review findings are based on documents in contractors' files. A document may be assumed missing when it is in fact misplaced in the file. Sometimes an incomplete document turns to have another more updated version in the file. There are also instances where field staff take corrective actions as they become aware of a problem, without the reviewer's knowledge, and findings become groundless. These situations result in misunderstandings and confusion. As a result, the reviewer learned to document the findings by copying the documents at issue and sharing the findings with the office manager at the end of the office visit to ensure the validity of the findings.

Limiting the Scope of the Review

The policies related to each of the SNP are intricate and extensive. Furthermore, different policies apply to cases within the same program depending on the contractor's status, program participants, and/or what variation of the program the contractor chooses to implement. The QA review task becomes taxing

and unmanageable when the scope of the review is not limited to one or two areas.

Limiting the Extent of the Review

It was learned that the number of files to review during a field office visit is crucial because it affects the thoroughness of the review and the field office operations during the visit. To limit the number of the files and at the same time review a representative sample the files were stratified according to the type of the contract (new or renewing) and the size and type of the contracting facility. A random sample was then selected from each strata and reviewed.

Having a Complete Picture Before Reaching Conclusions

In spite of the attempts to standardize the field offices' operations there are differences in these operations which stems from the unique approaches each manager takes to solve day to day operation problems. As a result, some of the findings turn out to be unique to an office. A lesson learned was to withhold generalizations until after all the offices were reviewed.

Maintaining Confidentiality While Sharing Experience

To maintain good relationships and trust findings were mentioned in general terms without reference to specific offices. This prevented the sharing of information at the early stages of a review cycle, when few offices were visited and it was easy for the rest of the offices to deduce at what office the findings were made.

Standardizing Procedures While Making Allowances

Sometimes one is caught between the desire to follow the same procedures in each field office and the need to tailor these procedure to the office's needs and circumstances. Besides, it is difficult to keep on following the same procedure after realizing that it needs to be modified. I modified the procedures when I felt the need to do so and at the same time noted the change in the procedure in the QA review report, whenever possible.

Dealing with Negative Attitudes

There is discomfort and resentment of the process of the QA review in the field offices for it seems to the staff of these offices that the state office is looking over their shoulders. To ease these feelings I learned to start the QA review by stating the goals of the review and stressing the fact that the ultimate goal is improvement and better public service. I assure the APMs that all findings will be shared with them during the office visit and a finding will not be reported unless they feel that it is accurate and valid.

Acknowledging Accomplishments

Acknowledging accomplishment is an important part of the review as it disseminates good practices and innovations to all the field offices. In addition to encouraging and supporting the office that follows a good practice it makes the practice more acceptable and better followed by the rest of the offices coming from one of them. In time, this is expected to make the QA review process more acceptable to the field offices.

Knowing When to Limit Counter Feedback

With all precautions taken findings are still disputed. In responding to a QA review report some field offices either dispute the findings or try to justify their actions. It seemed better to stop the cycle of feedback and counter feedback as long as there is a general summary of the issues and decisions are made to resolve these issues.

Following Through with Resolutions

Listing findings and issues is one thing and following through with resolutions and actions from the different SNP sections is another. perseverance of the reviewer and support of the administration are needed to achieve program change and improvement. If there are no resolution to issues raised during the QA review the whole purpose of the review, and future reviews, is defeated.

CONCLUSION

The QA review is a type of monitoring and evaluation that is relatively less formal in method and procedure than most types of research. It is usually internal and formative and aims at feedback to the managers. This is an attempt at extending the usefulness of the QA review. Efforts are directed toward standardizing the QA review process and increasing the information collected to be used for improvement. The QA review feedback loop is extended to include improvement efforts from both the managers and the staff reviewed, since both sides are stakeholders in public service.