

ADMINISTRATION OF THE SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM

LOUISIANA DEPARTMENT OF CHILDREN AND
FAMILY SERVICES

PERFORMANCE AUDIT SERVICES

Informational Report
Issued March 1, 2023

**LOUISIANA LEGISLATIVE AUDITOR
1600 NORTH THIRD STREET
POST OFFICE BOX 94397
BATON ROUGE, LOUISIANA 70804-9397**

LEGISLATIVE AUDITOR
MICHAEL J. "MIKE" WAGUESPACK, CPA

FIRST ASSISTANT LEGISLATIVE AUDITOR
ERNEST F. SUMMERVILLE, JR., CPA

DIRECTOR OF PERFORMANCE AUDIT SERVICES
KAREN LEBLANC, CIA, CGAP, MSW

DATA ANALYTICS MANAGER
CHRIS MAGEE, CIA, CGAP, CFE, MBA

AUDIT TEAM
JULIE FLOYD, CIA, CGAP, MPA

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March 1, 2023

The Honorable Patrick Page Cortez,
President of the Senate
The Honorable Clay Schexnayder,
Speaker of the House of Representatives

Dear Senator Cortez and Representative Schexnayder:

The purpose of this report was to provide information on the Department of Children and Family Services' (DCFS) administration of the Supplemental Nutrition Assistance Program (SNAP) and to identify potential areas for efficiency improvements.

SNAP participants must meet various eligibility criteria, including those related to income, resources, and residency. Applicants must submit documents to support that they meet the criteria and complete an interview to verify their information and answer additional questions. Once a participant is approved for SNAP, benefits are automatically issued every month until the SNAP case is closed.

We found that most SNAP cases were closed because of non-financial procedural reasons, and most participants who lost benefits began receiving them again within three months. During federal fiscal years 2018 through 2022, 81.1% of closed SNAP cases were closed for non-financial procedural reasons, and from January 2019 through February 2020, 59.5% of the closed cases were churned, meaning they were reopened within 90 days of closure.

In addition, we found that the percentage of SNAP cases DCFS reviewed for Quality Control (QC) that had errors rose from federal fiscal years 2018 through 2022. In addition, while DCFS' error rates were lower than or near the national average in federal fiscal years 2018 and 2019, error rates overall increased from federal fiscal years 2018 through 2021. The percent of active SNAP cases reviewed for QC that had errors rose from 4.4% in federal fiscal year 2018 to 44.9% in 2022, while the percent of negative SNAP cases reviewed for QC and had errors increased from 33.2% to 59.8%. Active cases are households participating in SNAP; negative cases are households for which participation has been denied, suspended, or terminated. According to DCFS, the number of errors rose because of staffing shortages, the number of Disaster SNAP (DSNAP) operations agency staff responded to between September 2020 and November 2021, and multiple COVID-19 flexibilities.

We also found that while DCFS has a process to track SNAP complaints, data issues limit the agency's ability to efficiently use the information to identify trends or to determine if the complaints are valid and resolved in a timely manner.

Finally, although DCFS' Customer Service Call Center (CSC) vendor has not consistently met its contractual obligations, agency officials stated they have worked with the company to address compliance issues. For example, the contract requires that the average time to answer calls should not exceed six minutes. However, we found that in seven of 14 months, the average time to answer exceeded six minutes, ranging from a high of 50 minutes and 49 seconds in September 2021 to a low of nine seconds in October 2022.

I hope this report will benefit you in your legislative decision-making process.

We would like to express our appreciation to the Department of Children and Family Services for its assistance with this report.

Respectfully submitted,



Michael J. "Mike" Waguespack, CPA
Legislative Auditor

MJW/aa

SNAPADMIN

Louisiana Legislative Auditor

Michael J. "Mike" Waguespack, CPA



Administration of the Supplemental Nutrition Assistance Program

Louisiana Department of Children and Family Services

March 2023

Audit Control #40220029

Introduction

We evaluated the Supplemental Nutrition Assistance Program (SNAP) within the Department of Children and Family Services (DCFS) to provide information and to identify potential areas to improve efficiency. We conducted this review in response to House Resolution 248¹ of the 2022 Regular Legislative Session, which requested the Louisiana Legislative Auditor's (LLA) office conduct an efficiency audit of SNAP.²

SNAP (previously known as the "Food Stamps" program) was authorized by the United States Congress in 1964 to alleviate hunger and malnutrition by allowing low-income households to obtain a more nutritious diet by increasing food purchasing power for eligible households.

As of November 2022, there were 902,255 SNAP participants in Louisiana. In February 2020, prior to the COVID-19 pandemic in Louisiana, there were 769,768 SNAP participants in Louisiana. However, as a result of the COVID-19 pandemic, the number of SNAP participants increased to 981,751 in January 2021. Maximum monthly benefits depend on household size and as of October 1, 2022, ranged from \$281 for a single person to \$1,691 for a household of eight,³ which includes additional amounts for emergency allotments in response to the COVID-19 pandemic. SNAP participants are able to spend benefits on food items such as breads, cereals, fruits, vegetables, meats, dairy, and seeds for food. SNAP participants are not able to use their benefits to purchase alcohol, tobacco products, pet foods, soaps, paper products, vitamins, medicines, or hot foods. In federal fiscal year 2022, Louisiana SNAP benefits totaled approximately \$2.46 billion, with an average SNAP benefit of \$508.93 per month.

SNAP is managed at the federal level by the United States Department of Agriculture's Food and Nutrition Service (FNS). DCFS administers the program in Louisiana. FNS is responsible for promulgating program rules and ensuring that states administer the program in compliance with these rules. DCFS is responsible for determining participant eligibility and enrolling and monitoring participants.

¹ <https://legis.la.gov/legis/ViewDocument.aspx?d=1288158>

² House Resolution 248 also requested the LLA to analyze the SNAP Employment and Training program which will be released in a separate audit report.

³ Each additional person in a household greater than eight increases the benefit amount by \$211.

Federal regulations require DCFS to have a system for monitoring and improving its administration of SNAP. As a part of that system, DCFS conducts quality control (QC) reviews of SNAP cases. FNS uses the results of the QC reviews to calculate error rates for each state and a national average and may assess monetary penalties to states with persistently higher-than-average error rates.

SNAP participants must meet various eligibility criteria including financial requirements related to income and resources, and other criteria such as residency requirements. SNAP applicants submit documents to support that they meet criteria and complete an interview to verify information and answer additional questions. Once a participant is approved for SNAP, benefits are automatically issued to the participant's SNAP account every month they are approved to receive benefits (certification period) until the SNAP case is closed. Certification periods range from 12 to 36 months depending on the individual's circumstance. As shown in Exhibit 1, SNAP participants must provide updated information to DCFS at specified intervals to ensure they remain eligible.

Exhibit 1 Required Reporting Procedures by SNAP Participants	
Reporting Type	Description
Simplified Reporting	Participants complete simplified reporting at the mid-point of the certification period (e.g., prior to the sixth month of a 12-month certification period).
Recertification/ Redetermination	Prior to the end of the certification period, participants complete a redetermination process.
Source: Prepared by legislative auditor's staff using data from DCFS.	

In response to the COVID-19 pandemic, FNS approved a range of "flexibilities" to assist states in ensuring access to SNAP was maintained for participants despite rising caseloads and challenges associated with the pandemic. Examples of flexibilities include emergency benefit allotments, changes to application processing requirements, waived interviews, and changes to quality control requirements.

The objective of this review was:

To provide information about the Department of Children and Family Services' administration of the Supplemental Nutrition Assistance Program and to identify potential areas to improve efficiency.

Our results are summarized on the next pages and discussed in detail throughout the remainder of the report. Appendix A contains a summary of management's response, while Appendix B contains our scope and methodology. Appendix C shows the reasons that SNAP cases closed, Appendix D shows the errors for active and negative cases reviewed as part of the QC process, and Appendix E shows customer service call center metrics.

Informational reports are intended to provide more timely information than standards-based performance audits. While these informational reports do not follow *Governmental Auditing Standards*, we conduct quality assurance activities to ensure the information presented is accurate. We met with DCFS and incorporated its feedback throughout this informational report.

Objective: To provide information about the Department of Children and Family Services' administration of the Supplemental Nutrition Assistance Program and to identify potential areas to improve efficiency.

We found the following:

- **Most SNAP cases are closed for non-financial procedural reasons instead of SNAP participants not meeting financial eligibility requirements such as too much income, and most SNAP participants who lose benefits begin receiving them again within three months.** During federal fiscal years 2018 through 2022, 1,202,816 (81.1%) of 1,482,998 SNAP cases that closed were closed for non-financial procedural reasons, and from January 2019 through February 2020, 61,628 (59.5%) of 103,510 cases closed were churned, meaning they were re-opened within 90 days of closure.
- **The percent of SNAP cases DCFS reviewed for Quality Control (QC) that had errors increased from federal fiscal years 2018 through 2022. In addition, while DCFS' error rates were lower than or near the national average in federal fiscal years 2018 and 2019, error rates increased from federal fiscal years 2018 through 2021.** The percent of active SNAP cases reviewed for QC that had errors increased from 34 (4.4%) of 773 cases in federal fiscal year 2018 to 283 (44.9%) of 630 cases in 2022, while the percent of negative SNAP cases reviewed for QC and had errors increased from 242 (33.2%) of 728 cases in federal fiscal year 2018 to 394 (59.8%) of 659 cases in 2022. According to DCFS, these errors increased due to staffing shortages, the number of Disaster SNAP (DSNAP) operations that DCFS staff responded to between September 2020 and November 2021, and multiple COVID-19 flexibilities.
- **While DCFS has a process to track complaints it receives about SNAP, issues with the data limit DCFS' ability to efficiently use it to identify trends or to determine if complaints are valid and resolved timely.** For example, while there is a field for inputting if a complaint is valid or invalid, 760 (35.4%) of 2,146 complaint records were blank in this field.
- **Although DCFS' Customer Service Call Center (CSC) vendor has not consistently met its contractual obligations, DCFS stated that it has worked with them to address compliance issues.** For example, the contract requires that the average speed to answer calls

should not exceed six minutes. However, we found that in seven (50.0%) of 14 months, the average speed to answer exceeded six minutes. The average speed ranged from a high of 50 minutes and 49 seconds in September 2021 to a low of nine seconds in October 2022.

Our findings and our recommendations are discussed in more detail in the sections below.

Most SNAP cases are closed for non-financial procedural reasons instead of SNAP participants not meeting financial eligibility requirements such as too much income, and most SNAP participants who lose benefits begin receiving them again within three months.

SNAP benefits are issued monthly to eligible participants until DCFS closes the case. DCFS will close a case when the participant no longer meets financial eligibility requirements or does not meet non-financial requirements such as completing and submitting required documentation. SNAP participants must complete simplified reporting at the midpoint of their certification period and a redetermination process prior to the end of their certification period to ensure they remain eligible. Administrative or procedural issues, such as not completing a simplified report or redetermination on-time may cause SNAP participants to lose benefits even though their financial situation may still make them eligible to receive benefits. Those who lose benefits for a non-financial procedural reason may need to re-apply, which creates more work for agency staff. When SNAP participants exit SNAP only to return to the program soon after, this is known as churn.

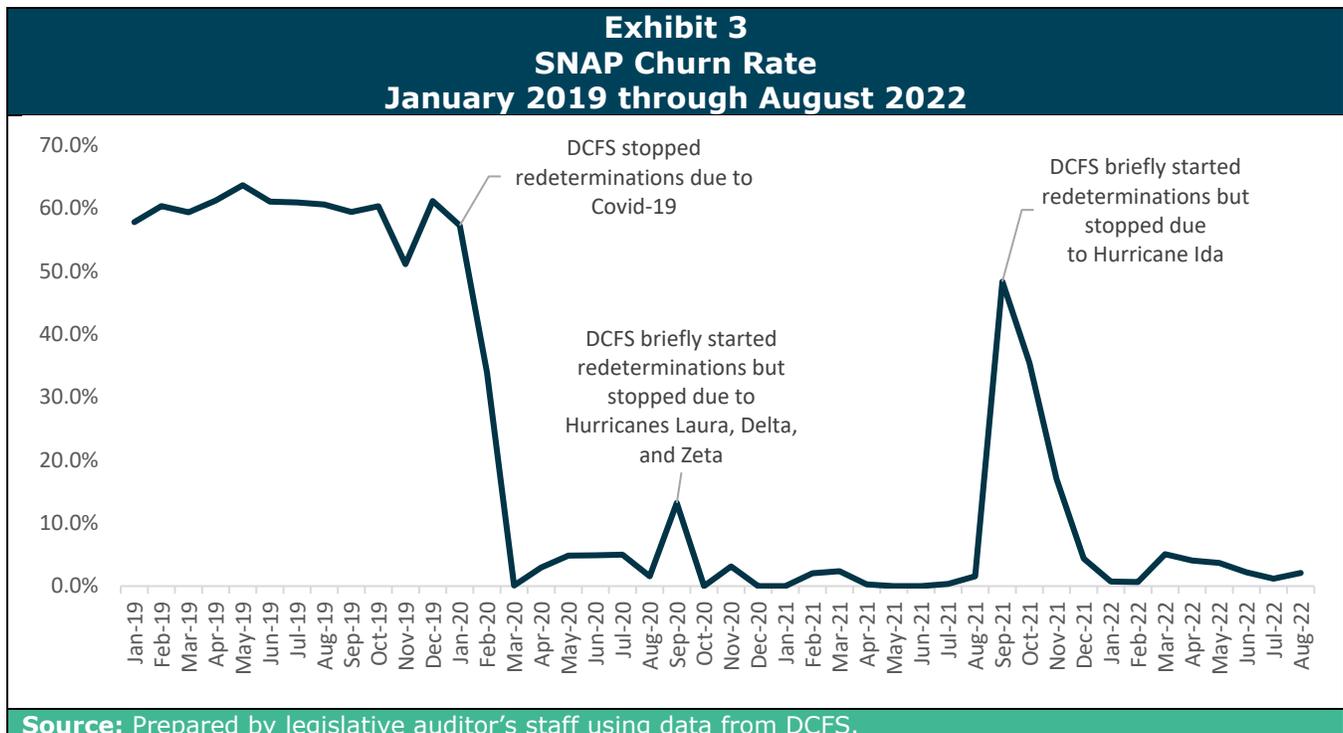
DCFS defines **churn** as a SNAP participant leaving the program and returning within 90 days.

During federal fiscal years 2018 through 2022, 1,202,816 (81.1%) of 1,482,998 of SNAP cases that closed were closed for non-financial procedural reasons instead of SNAP participants not meeting financial eligibility requirements such as too much income. Non-financial procedural reasons most commonly included a SNAP participant failing to provide information within a specified timeframe, failing to complete a simplified report, or failing to complete a redetermination. Exhibit 2 shows the non-financial procedural reasons cases were closed during federal fiscal years 2018 through 2022, while Appendix C shows all the reasons that SNAP cases were closed during the same time period.

Exhibit 2						
SNAP Cases Closed for Non-financial Procedural Reasons						
Federal Fiscal Years 2018 through 2022						
Reason	FFYs 18 & 19		FFYs 20 & 21		FFY22	
	#	%	#	%	#	%
Did not complete redetermination or simplified report	249,676	46.0%	316,561	74.7%	137,056	58.1%
Did not provide required information within specific timeframe	264,812	48.8%	100,883	23.8%	93,833	39.8%
Did not keep appointment, complete interview,* or comply with requirements	28,463	5.2%	6,452	1.5%	5,080	2.1%
Total	542,951	100%	423,896	100%	235,969	100%
* Interviews were waived as part of a COVID-19 flexibility between March 2020 and April 2022.						
Source: Prepared by legislative auditor's staff using data from DCFS.						

From January 2019 through February 2020, 61,628 (59.5%) of 103,510 cases closed were churned. Churn rates significantly declined from March 2020 through August 2022 due to COVID-19 flexibilities that extended certification periods. Non-financial procedural issues, such as those listed in Exhibit 2 above, may cause SNAP participants to lose benefits even though they may still meet financial eligibility requirements such as income. According to a churn study issued by FNS in 2014,⁴ churn is a policy concern for several reasons including the lost benefits for participants who remained eligible while off the program, the participant's time and expense involved in re-entering the program, and the additional federal and state administrative costs associated with the case closings and re-opening. The study further stated that for participants, in addition to experiencing food insecurity, the loss of benefits results in broader financial insecurity for SNAP churners. For example, in having to commit more of their scarce income for food, churners were less able to pay important bills such as their utilities or rent. According to DCFS, churn rates declined significantly starting in March 2020 due to COVID-19 flexibilities that extended certification periods, meaning DCFS delayed the redetermination process. Exhibit 3 shows the churn rate from January 2019 through August 2022.

⁴ <https://www.fns.usda.gov/snap/understanding-rates-causes-and-costs-churning-supplemental-nutrition-assistance-program-snap>



DCFS stated that when churn rates increase, it attempts to identify and address the cause. In addition, according to DCFS, it has implemented the following strategies to reduce the number of cases closed for procedural reasons and churn:

- To make the due dates and consequences for failing to complete simplified reporting (SR) and redeterminations more noticeable to participants, DCFS modified the letters that it sends to participants when reports are due.
- To further remind SNAP participants to submit required reports and information, DCFS began alerting SNAP participants by text message in February 2022 when reports were overdue. For example, in May 2022, 22,129 cases were projected to close because the SR was overdue. However, after sending the text message, only 4,674 (21.1%) of those cases actually closed.
- To encourage staff to reach out to participants who do not submit documents, DCFS provided training for staff.
- To be responsive to the preferences of SNAP participants for completing reports, DCFS switched from online/paperless reporting back to paper forms based on feedback from advocacy groups.

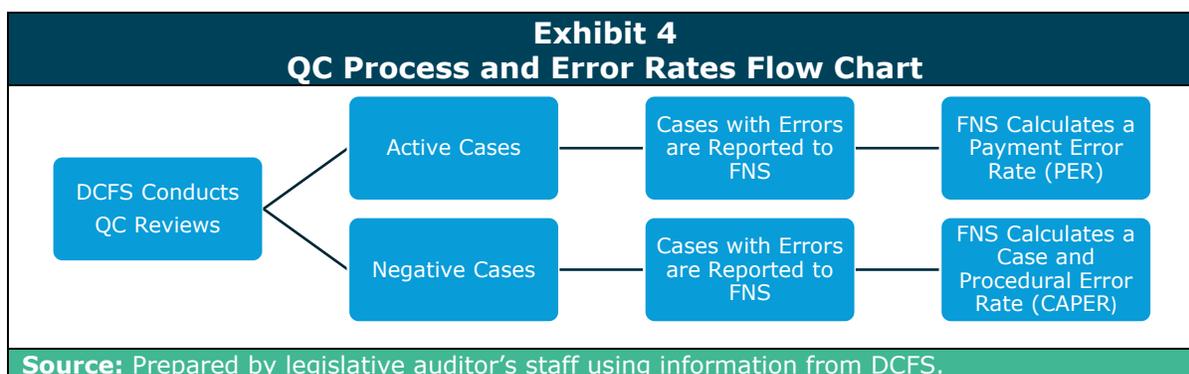
The percent of SNAP cases DCFS reviewed for Quality Control (QC) that had errors increased from federal fiscal years 2018 through 2022. In addition, while DCFS' error rates were lower than or near the national average in federal fiscal years 2018 and 2019, error rates increased from federal fiscal years 2018 through 2021.⁵

Federal regulations⁶ require DCFS to have a system for monitoring and improving its administration of SNAP. As a part of that system, DCFS conducts QC reviews of active and negative SNAP cases (see text box), in part, to provide a timely, continuous flow of information on which to base corrective action at all levels of administration.⁷ These reviews measure the accuracy of eligibility determinations, but errors do not indicate fraud.

FNS uses the results of the QC reviews to calculate error rates for each state and a national average. Federal QC requirements were suspended between March 2020 and June 2021 as part of COVID-19 flexibilities. DCFS continued to conduct QC reviews of SNAP cases but reported a smaller number of cases to FNS. According to FNS, it will not calculate official error rates for federal fiscal years 2020 or 2021 due to a lack of QC data caused by the flexibilities described above. Exhibit 4 illustrates the QC and error rate process.

Active cases are households participating in SNAP. Reviews are conducted to determine if households are eligible and receiving the correct allotment amounts.

Negative cases are households for which participation was denied, suspended, or terminated. Reviews are conducted to determine whether decisions to deny, suspend, or terminate cases were correct; and to review the notices DCFS sends to participants.



⁵ We analyzed error rates through federal fiscal year 2021 because FNS had not published error rates for federal fiscal year 2022 at the time of our analysis.

⁶ 7 Code of Federal Regulations (C.F.R.) 275.1

⁷ The other objectives of QC reviews are to provide a systematic method of measuring the accuracy and validity of SNAP caseloads, a basis for determining error rates, and a basis for establishing monetary penalties for states with error rates that are consistently worse than national performance standards.

Active SNAP cases reviewed by DCFS for QC that had errors increased from 34 (4.4%) of 773 cases in federal fiscal year 2018 to 283 (44.9%) of 630 cases in 2022, while negative SNAP cases reviewed for QC that had errors increased from 242 (33.2%) of 728 cases in federal fiscal year 2018 to 394 (59.8%) of 659 cases in 2022. During federal fiscal years 2018 through 2022, DCFS reviewed between 151 and 880 active cases and between 101 and 728 negative cases.⁸ The percent of active and negative cases reviewed that had errors increased from federal fiscal years 2018 to 2022, as shown in Exhibit 5. Errors for active cases include paying too much in benefits (over-issuance), not paying enough in benefits (under-issuance), or paying benefits to ineligible participants. Errors for negative cases indicate that the decision to deny, suspend, or terminate the SNAP case was incorrect, or there were errors related to the notices that DCFS sends to participants.

Exhibit 5						
SNAP QC Active and Negative Cases with Errors*						
Federal Fiscal Years 2018 through 2022**						
FFY	Active Cases			Negative Cases		
	Cases Reviewed	Cases with Errors	%	Cases Reviewed	Cases with Errors	%
2018	773	34	4.4%	728	242	33.2%
2019	880	50	5.7%	685	238	34.7%
2020	504	225	44.6%	355	117	33.0%
2021	151	63	41.7%	101	60	59.4%
2022	630	283	44.9%	659	394	59.8%

* Includes only the cases that were reported to FNS as part of the required QC process. The QC process was suspended from March 2020 to June 2021 due to COVID-19 flexibilities. During that time, DCFS continued to conduct QC reviews, but reported a smaller number of QC cases to FNS.
** DCFS had not completed all QC reviews for federal fiscal year 2022 at the time of our analysis, as it has 115 days from the end of the sample month to complete its review.
Source: Prepared by legislative auditor's staff using data from DCFS.

DCFS conducts an in-depth QC analysis of certain active cases with errors⁹ to determine the reason for the error (over-issuance, under-issuance, or issuance to ineligible participants). During federal fiscal years 2018 through 2022, DCFS conducted an in-depth analysis of 247 active cases with errors and found that 123 (49.8%) had errors caused by DCFS while 124 (50.2%) were caused by the SNAP participant.¹⁰ DCFS also conducts an in-depth QC analysis of negative cases with errors to determine the reason for the error (DCFS decisions to deny, suspend, or terminate a case was incorrect, or there was an issue with the notice). During federal fiscal years 2018 through 2022, DCFS conducted an analysis of 1,051 negative cases with errors. Exhibit 6 shows the most common error reasons for

⁸ Includes only the cases that were reported to FNS as part of the required QC process. The QC process was suspended between March 2020 and June 2021 due to COVID-19 flexibilities. During that time, DCFS continued to conduct QC reviews but reported a smaller number of QC cases to FNS.

⁹ Each year FNS sets an error threshold. If an active case has an error amount that is greater than the threshold, the case is included in the in-depth QC analysis. For example, the error threshold ranged from \$37 to \$48 for federal fiscal years 2020 through 2021.

¹⁰ Only includes active cases with errors that exceed the error threshold set by FNS.

active and negative cases during federal fiscal years 2018 through 2022, while Appendix C shows all of the error reasons during that time.

Exhibit 6			
SNAP QC Most Common Errors for Active and Negative Cases*			
Federal Fiscal Years 2018 through 2022**			
Error	Description	Cases with Errors***	Percent
Active Cases. DCFS reviewed 247 active cases during FFY 2018-2022			
Wages and Salaries Errors	Errors related to income earned by a participant, such as the participant receiving more income from a source than was budgeted for on their eligibility determination.	92	37.2%
Shelter Deduction Errors	Errors related to a household deduction that can be taken for some or all shelter expenses (e.g. rent or mortgage), such as the deduction being taken when it should not have been.	50	20.2%
Retirement, Survivors, and Disability Insurance (RSDI) Benefits Errors	Errors related to these benefits such as all income from a source was known but not included, or the participant received more from these sources than was budgeted for on their eligibility determination.	19	7.7%
Negative Cases. DCFS reviewed 1,051 negative cases during FFY 2018-2022			
Notice Errors	Errors related to DCFS communications with participants that explain actions related to their case such as changes to benefits. For example, DCFS' notice was not clearly understandable.	451	42.9%
Application Errors	Errors related to failures to complete application processing requirements correctly. For example, DCFS failed to process an application timely or failed to provide expedited services.	178	16.9%
Verification Errors	Errors related to verifying the circumstances of the SNAP household such as resources and income. For example, DCFS improperly denied or terminated a case due to failure to provide verification when the verification was actually received by DCFS.	161	15.3%
<p>* Includes only the cases that were reported to FNS as part of the required QC process. The QC process was suspended from March 2020 to June 2021 due to COVID-19 flexibilities. During that time, DCFS continued to conduct QC reviews, but reported a smaller number of QC cases to FNS.</p> <p>** DCFS had not completed all QC reviews for federal fiscal year 2022 at the time of our analysis, as it has 115 days from the end of the sample month to complete its review.</p> <p>*** This was the initial error; however, negative cases may have multiple errors.</p> <p>Source: Prepared by legislative auditor's staff using data from DCFS.</p>			

According to DCFS, errors increased due to staffing shortages and the number of Disaster SNAP (DSNAP) operations¹¹ that DCFS staff responded to between September 2020 and November 2021, which increased caseloads. DCFS further stated that a significant number of errors occurred because SNAP

¹¹ DSNAP provides eligible low- to moderate-income households who do not normally receive SNAP benefits with help buying groceries due to lost income or damages following a disaster.

participants did not provide complete and accurate information on applications, but DCFS could not clarify questions because interviews were waived as part of a COVID-19 flexibility between March 2020 and April 2022.¹² DCFS stated that it transitioned back to interviewing participants in May 2022. In addition, DCFS started using a new eligibility computer system in February 2020 and in March 2020, DCFS staff were sent home to telework due to COVID-19. While working from home, staff did not have the benefit of on-site assistance from those staff with more experience working in the new system and had to trouble shoot on their own. DCFS stated that it has implemented strategies to reduce the number of errors, such as monthly calls with leadership, new policies, and additional trainings and is creating a new case review team to review cases and correct any errors made prior to issuing benefits.

During federal fiscal years 2018 and 2019, Louisiana’s payment error rate (PER) and case and procedural error rate (CAPER) were lower than or near the national average. However, the PER and CAPER have each increased from federal fiscal years 2018 through 2021. FNS uses the results of states’ QC reviews described above to calculate a PER and CAPER for each state and a national average.¹³ Due to the increase in the number of QC errors and the causes described in the section above, DCFS’ PER increased from 2.7% in federal fiscal year 2018 to 8.8% in federal fiscal year 2021. DCFS’ CAPER increased from 33.2% in federal fiscal year 2018 to 58.3% in federal fiscal year 2021. Exhibit 7 shows the error rates for Louisiana and the national average for federal fiscal years 2018 through 2021.

PER is the measurement of the accuracy of the active case review and is the sum of the individual overpayment and underpayment error rates. PER is not a measure of fraud.

CAPER is the measurement of negative case reviews and measures the accuracy of SNAP denial, suspension, or termination of benefits and the adherence to federal procedures when such actions are taken.

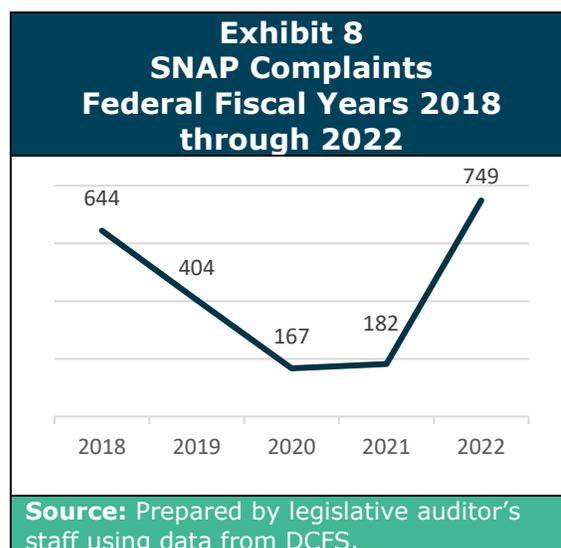
Exhibit 7				
SNAP Error Rates				
Federal Fiscal Years 2018 through 2021*				
	2018	2019	2020	2021
Payment Error Rate (PER) for Active Cases				
Louisiana	2.7%	3.8%	7.8%	8.8%
National	6.8%	7.4%	NA	NA
Case and Procedural Error Rate (CAPER) for Negative Cases				
Louisiana	33.2%	34.7%	33.0%	58.3%
National	37.7%	34.0%	NA	NA
* We analyzed error rates through 2021 because FNS had not published error rates for FFY22 at the time of our analysis.				
Source: Prepared by legislative auditor’s staff using data from DCFS and FNS.				

¹² Interviews were conducted in July 2020, July 2021, and August 2021.

¹³ According to FNS, it will not calculate official error rates for federal fiscal years 2020 or 2021 due to a lack of QC data caused by flexibilities that allowed states to suspend QC activities due to COVID-19; the error rates for those years are unofficial state reported error rates.

While DCFS has a process to track complaints it receives about SNAP, issues with the data limit DCFS' ability to efficiently use it to identify trends or to determine if complaints are valid and resolved timely.

Federal regulations require states to maintain a system for handling program complaints filed by participants, potential participants, or other groups related to processing applications and services to participants. DCFS allows complaints to be submitted in person, by mail, or by phone, and the complaints are manually logged/tracked using an Excel spreadsheet by each DCFS regional office. Exhibit 8 shows the number of complaints related to SNAP received by DCFS from federal fiscal years 2018 through 2022.¹⁴



During federal fiscal years 2018 through 2022, there were an average of 846,525 SNAP participants each year, and during that time, DCFS received at least 2,146 complaints related to SNAP. Examples of complaints include rude behavior, DCFS workers failing to return a participant's call, or participants losing benefits. For example, we found one complaint where a participant did not receive benefits on time because the letter notifying the participant to complete a simplified report was returned to DCFS with a forwarding address, but DCFS did not forward the letter to the correct address. When the participant contacted DCFS, it was able to reinstate all the lost benefits. Federal regulations¹⁵ require that DCFS follow-up on complaints, resolve complaints, take action where warranted, maintain records of complaint dispositions, and review records at least annually to assess whether there are patterns of problems. In addition, the National State Auditor's Association states that an agency should track and oversee complaints to ensure they are being addressed appropriately and timely.¹⁶

While DCFS has a process to track complaints, issues with how complaint data is recorded limits DCFS' ability to efficiently use it to identify trends or to determine if complaints are valid and resolved timely.

According to DCFS, regional complaint data is sent to DCFS' State Office once a quarter and is used for training purposes. However, we identified various issues

¹⁴ According to DCFS, some complaints received by the call center are maintained in a separate system. In addition, we excluded some complaints from our analysis because they did not have a valid date, and we could not determine the accurate federal fiscal year that DCFS received the complaint.

¹⁵ 7 C.F.R. 271.6

¹⁶ https://www.nasact.org/files/News_and_Publications/White_Papers_Reports/NSAA%20Best%20Practices%20Documents/2004_Carrying_Out_a_State_Regulatory_Program.pdf

with the data which may limit DCFS' ability to efficiently use the data to evaluate issues with SNAP. For example:

- **Complaint Category.** While there is a field for inputting a complaint category, DCFS cannot efficiently use it to identify trends because staff can enter free text complaint categories instead of uniform descriptions to identify the category of complaint. For example, there were 417 different complaint categories used. In addition, 572 (26.7%) of 2,146 complaints have the complaint category "program." While the details of the complaint are typed in additional text fields, DCFS may benefit from defining and using consistent complaint categories to more efficiently identify trends and develop appropriate training.
- **Valid/Invalid.** While there is a field for inputting whether a complaint is valid or invalid, 760 (35.4%) of 2,146 complaint records were blank in this field. DCFS staff may enter this information into a free text comment field, but DCFS cannot efficiently determine if these complaints are valid.
- **Resolved.** While there is a field for inputting whether a complaint is resolved, 559 (26.0%) of 2,146 complaint records were blank in this field. DCFS staff may enter this information into a free text comment, but DCFS cannot efficiently determine if these complaints are resolved.
- **Resolved Timely.** Parish office staff are required to contact the complainant within five days of the receipt of the complaint. While there is a date for when the complaint was received or input in the spreadsheet, there is no field for the date the complainant was contacted. A date of contact is sometimes entered into a free text field along with comments about the complaint, but DCFS cannot verify these complainants were contacted within five days as required without analyzing free text comments.

In addition, DCFS policy states that DCFS Customer Service will review the SNAP complaint data for error trends or patterns and provide the results to the Performance Reporting System Coordinator. However, DCFS stated that this is not done on a routine or ongoing basis.

Recommendation 1: DCFS should ensure uniform, accurate, and complete information is entered into complaint tracking systems to assist in improving its administration of SNAP.

Summary of Management's Response: DCFS agreed with this recommendation and stated that all complaints will be entered into the appropriate systems with uniform fields. See Appendix A for DCFS' full response.

Recommendation 2: DCFS should routinely use complaint data to assist in improving its administration of SNAP.

Summary of Management's Response: DCFS agreed with this recommendation and stated that it will use this data to identify potential customer service training needs in a particular area or region of the state on a quarterly basis. See Appendix A for DCFS' full response.

Although DCFS' Customer Service Call Center (CSC) vendor has not consistently met its contractual obligations, DCFS stated that it has worked with them to address compliance issues.

To improve SNAP service delivery, many states have customer service call centers (CSC) which handle general questions about SNAP, questions about application and benefit status, and other services such as complaints. Louisiana implemented its SNAP CSC in 2012. The contract with the current CSC vendor began in April 2019. According to DCFS, the cost of the CSC contract for SNAP for federal fiscal year 2022 was \$7.8 million with the federal government paying \$3.9 million, or 50%.¹⁷ From September 2021 through October 2022, DCFS' CSC received an average of 57,180 calls related to SNAP each month.

DCFS' CSC vendor has not consistently met its contractual

obligations. The CSC contract provides for a range of performance standards to ensure quality service levels, such as a call abandonment rate and the average speed to answer calls. The contract also allows the state to impose penalties on the CSC if it does not achieve performance standards. We reviewed CSC data provided by DCFS from September 2021 through October 2022¹⁸ and found that for SNAP the CSC did not consistently achieve performance standards and did not comply with certain contract requirements as shown below.

Abandonment Rate. The percent of calls abandoned while waiting to be answered. An abandoned call means the caller hangs up before reaching an agent.

Average Speed to Answer. The average time it takes for the call to be answered by an agent.

Appendix E provides CSC metrics for September 2021 through October 2022.

- **Abandonment rate.** According to the contract, the abandonment rate should not exceed 10% of total calls received.¹⁹ However, we found that in nine (64.3%) of 14 months, the CSC abandoned more than

¹⁷ In addition, the CSC contract cost \$1.8 million related to the American Rescue Plan Act and Pandemic EBT programs which were fully paid by the federal government.

¹⁸ The LLA requested CSC data for the entire period of the current contract starting in April 2019. According to DCFS, it was not able to provide this information because a subcontractor of its CSC vendor purged the CSC data in error.

¹⁹ Calls abandoned before six minutes are not included in the abandonment rate.

10% of calls. The abandonment rate ranged from a high of 56.1% in September 2021 to a low of 0.9% in October 2022.

- **Average speed to answer.** According to the contract, the average speed to answer calls should not exceed six minutes. However, we found that in seven (50.0%) of 14 months, the average speed to answer exceeded six minutes. The average speed ranged from a high of 50 minutes and 49 seconds in September 2021 to a low of nine seconds in October 2022.

The CSC contract also states that the CSC vendor is required to submit reports to DCFS regarding CSC performance metrics; however, they did not regularly submit these reports to DCFS until May 2022. In addition, the contract requires the vendor to provide DCFS with access to CSC metrics on a 24/7/365 basis, with capabilities to view documents, run reports, and view statistics on a real-time or historical basis. However, DCFS staff stated that they did not obtain this access until November 2022, or 44 months after the contract began. Although the CSC vendor has not meet requirements, as described above, DCFS stated that it has not penalized the vendor because the vendor was working with DCFS to resolve the issues. According to DCFS, the CSC vendor was acting in good faith to improve the performance issues. For example, the CSC vendor was meeting with DCFS bi-weekly to discuss performance measures, worked to resolve hiring and staffing issues, and replaced leadership.

According to DCFS, call center data is used to analyze call volumes and assist in identifying peak and non-peak times to ensure it has adequate staff to answer calls and complete other work assignments. DCFS stated that this allows them to meet the needs of those who want to complete their interview and also helps to identify risk associated with staff who may be under/over performing. For example, DCFS stated that it could look at call center data and identify an employee who is completing numerous interviews but in an average interview time of 10 minutes. This could mean that they may not be as thorough in the interview process, resulting in confusion for the participants and inaccurate payment issuance in benefits. However, DCFS is not able to use the CSC data to improve implementation of the program if the CSC vendor does not consistently provide the data or access to it as required by the contract.

Recommendation 3: DCFS should ensure its CSC vendor meets contract requirements, including performance measures, report submissions, and access to data.

Summary of Management's Response: DCFS agreed with this recommendation and stated that it will remain in frequent contact with the CSC vendor and take corrective action steps if the CSC vendor is deficient with contract requirements. See Appendix A for DCFS' full response.

Recommendation 4: DCFS should use CSC data to assist in improving its administration of SNAP.

Summary of Management's Response: DCFS agreed with this recommendation and stated that it will use CSC data to ensure adequate staffing and that interviews are being conducted thoroughly and accurately. See Appendix A for DCFS' full response.

APPENDIX A: MANAGEMENT'S RESPONSE



Executive Division
627 North 4th Street
Baton Rouge, LA 70802

(O) 225.342.0286
(F) 225.342.8636
www.dcfcs.la.gov

John Bel Edwards, Governor
Terri Porche Ricks, Secretary

February 17, 2023

Michael J. "Mike" Waguespack, CPA
Legislative Auditor
1600 North Third Street
Baton Rouge, LA 70804

Dear Mr. Waguespack:

The Department of Children and Family Services (DCFS) has reviewed the "Administration of the Supplemental Nutrition Assistance Program" (SNAP) Informational Report.

Finding #1: While DCFS has a process to track complaints, issues with how complaint data is recorded limits DCFS' ability to efficiently use it to identify trends or to determine if complaints are valid and resolved timely.

DCFS Response: DCFS concurs with this finding.

Recommendation: DCFS should ensure uniform, accurate, and complete information is entered into complaint tracking systems to assist in improving its administration of SNAP.

Recommendation: DCFS should routinely use complaint data to assist in improving its administration of SNAP.

A corrective action memo will be issued to all Economic Stability (ES) staff by the ES SNAP section to identify procedures for client complaints received by ES field staff. All complaints received by local ES parish offices will be entered into the Louisiana Integrated Technology for Eligibility (LITE) system for tracking. All complaints will be tracked and monitored by the parish office through resolution and will be closed out in LITE upon resolution.

Each complaint that is logged in LITE is assigned an ID and staff member to resolve the complaint. The following information is collected for each complaint and will be tracked in a report: Staff ID that created the complaint, Case ID, Case Name, Complaint Format, Type of Complaint, Complaint Date, Valid Complaint Indicator, Complaint Due Date, Resolution Date, and the Complaint Status.

All complaints received via other means (i.e. DCFS Customer Call Center or Legislative complaints) will be entered into the Monday.com Tracking Platform by the DCFS Client Services Section, Customer Relations staff for tracking. All complaints will be tracked by the manager of the Customer Relations team through resolution on a monthly basis to ensure all fields are completed and are closed appropriately and within 30 days. Any complaints not resolved within 30 days in the LITE system will be added to Monday.com for daily review by the Customer Relations Team.

The Customer Relations manager will request monthly reports from both LITE and Monday.com and review them on a quarterly basis to identify potential customer service training needs for ES staff. The report will be shared with Regional Administrators and the ES Director for their review to determine if there are trends and identify training opportunities in a particular area or region of the state to improve SNAP Administration.



Finding #2: DCFS' CSC vendor has not consistently met its contractual obligations.

DCFS Response: DCFS concurs with this finding.

Recommendation: DCFS should ensure its CSC vendor meets contract requirements, including performance measures, report submissions, and access to data.

The Client Services manager will remain in frequent contact with the CSC vendor including weekly meetings until the end of the contract to review performance measures, such as the Abandonment Rate and Average Speed to Answer, timely report submissions, and guarantee access to accurate and complete data.

If the CSC vendor is deficient with contract requirements, a written notification letter from DCFS regarding the deficiency will be sent to the CSC vendor. The CSC vendor will be given 30 days after the date of the written notification to correct the problem. If the problem is corrected within the 30 day corrective action period there will be no penalty.

If the deficiency is not corrected within the 30 days of the corrective action period, the CSC vendor will receive a reduction of 5% of each month's invoice up to 20%, beginning the first month of the corrective action period.

The penalty will be removed once the CSC vendor is in compliance. After the deficiency is resolved, if the CSC Vendor fails to comply again for the same deficiency, the 5% reduction shall be imposed without the benefit of the 30 day corrective action period.

Recommendation: DCFS should use CSC data to assist in improving its administration of SNAP.

CSC data will continue to be used to analyze call volumes for DCFS workers and identify peak and non-peak times to ensure adequate staff are available to answer calls and complete other work assignments. In addition, CSC data pulled from the phone system software will be used to identify employees who may have a less than average time on the phone completing a SNAP interview, leading to a review of those calls to ensure interviews are being conducted thoroughly and accurately to improve SNAP Administration or identify any associated risk.

If you have any additional questions, please contact Deputy Assistant Secretary Monica Brown. You can reach her at (225) 333-7648 or Monica.Brown.DCFS@la.gov

Sincerely,



Terri Porche Ricks
Secretary

cc: Ashley Sias, Assistant Secretary, Division of Family Support
Monica Brown, Deputy Assistant Secretary, Economic Stability



APPENDIX B: SCOPE AND METHODOLOGY

This report provides the results of our review of the Department of Children and Family Services' administration of the Supplemental Nutrition Assistance Program (SNAP). We conducted this review under the provisions of Title 24 of the Louisiana Revised Statutes of 1950, as amended. This review covered October 1, 2017, through November 30, 2022. Our objective was:

To provide information about the Department of Children and Family Services' administration of the Supplemental Nutrition Assistance Program and to identify potential areas to improve efficiency.

To answer our objective, we reviewed internal controls relevant to the objective and performed the following steps:

- Researched relevant federal and state laws, regulations, and policies related to SNAP including information about flexibilities allowed by the United States Department of Agriculture's Food and Nutrition Service (FNS) as a result of COVID-19.
- Met with DCFS management and staff to obtain an understanding of SNAP and DCFS procedures related to recertification/redetermination and closing cases, Quality Control reviews, tracking complaints, and monitoring the customer call center vendor.
- Obtained and analyzed SNAP case closure data for federal fiscal years 2018 through 2022 to identify trends including the most common reasons that SNAP cases are closed.
- Obtained and analyzed SNAP churn data for January 2019 through August 2022 to identify trends.
- Obtained and analyzed SNAP Quality Control (QC) data for federal fiscal years 2018 through 2022 to identify common errors, and the percent of cases reviewed for QC that had errors. This analysis only included the cases reviewed for QC that were also released to FNS.
- Researched relevant information including Louisiana's official and state reported errors rates and national error rates for federal fiscal years 2018 through 2021.
- Obtained and analyzed SNAP complaint data for federal fiscal years 2018 through 2022 to identify trends and to test for compliance with DCFS policies and best practices. Due to time limitations, we could not verify the reliability of SNAP complaint data provided by DCFS.

- Obtained and analyzed SNAP call center contract and data for September 2021 through October 2022 to identify trends and to test for compliance with DCFS policy and the contract. The LLA requested CSC data for the entire period of the current contract starting in April 2019. According to DCFS, it was not able to provide this information because a subcontractor of its CSC vendor purged the CSC data in error. Due to time limitations, we could not verify the reliability of SNAP call center data provided by DCFS.
- Researched relevant information such as strategies to reduce churn and best practices related to handling complaints.
- Met with DCFS to discuss our conclusions and incorporated its feedback, including efforts to improve implementation of the program in the report.

APPENDIX C: SNAP CASE CLOSE REASON

This appendix includes all the reasons that SNAP cases were closed during federal fiscal years 2018 through 2022.

SNAP Case Close Reason Federal Fiscal Years 2018 through 2022													
Close Reason	Description/ Examples	2018		2019		2020		2021		2022		Total	
		#	%	#	%	#	%	#	%	#	%	#	%
Procedural	Participant failed to complete simplified report, redetermination, failed provide required information within specified timeframe, etc.	285,168	82.5%	257,783	80.9%	180,571	72.6%	243,325	85.3%	235,969	83.0%	1,202,816	81.1%
Other Eligibility	Death, drug conviction, moved out of state, etc.	24,850	7.2%	23,244	7.3%	26,240	10.5%	11,629	4.1%	12,057	4.2%	98,020	6.6%
Earned Income	Increase in wages, new employment, failed net income test, gross income is ineligible, etc.	23,238	6.7%	22,316	7.0%	7,649	3.1%	6,790	2.4%	10,296	3.6%	70,289	4.7%
Unearned Income	Increase in federal or state benefits, increase in child support, failed gross income test, etc.	457	0.1%	492	0.2%	23,175	9.3%	15,179	5.3%	17,375	6.1%	56,678	3.8%
Sanctions	Participant failed to register for work, failed to comply with LaJET or Louisiana Workforce Commission, due to non-cooperation with quality control, etc.	9,704	2.8%	12,282	3.9%	3,758	1.5%	87	0.0%	132	0.0%	25,963	1.8%
Other	Participant request or originally ineligible	64	0.0%	55	0.0%	5,444	2.2%	8,325	2.9%	8,595	3.0%	22,483	1.5%
Application Withdrawn	Application voluntarily withdrawn	2,420	0.7%	2,284	0.7%	2,043	0.8%	1	0.0%	1	0.1%	6,749	0.5%
Total		345,901	100%	318,456	100%	248,880	100%	285,336	100%	284,425	100%	1,482,998	100%

Source: Prepared by legislative auditor's staff using data from DCFS.

APPENDIX D: SNAP CASE ERRORS

This appendix includes error reasons for active and negative cases that were reviewed for QC and had errors during federal fiscal years 2018 through 2022.

SNAP Quality Control Reviews of Active Cases (over threshold)												
All Errors*												
Federal Fiscal Years 2018 through 2022												
Error Reason	2018		2019		2020		2021		2022		Total	
	#	%	#	%	#	%	#	%	#	%	#	%
Student Status	0	0.0%	1	2.0%	0	0.0%	1	5.0%	1	1.3%	3	1.3%
Household Composition	0	0.0%	1	2.0%	3	4.7%	3	15.0%	10	12.7%	17	6.9%
Employment & Training Programs	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	1.3%	1	0.4%
Work Registration Requirements	0	0.0%	1	2.0%	0	0.0%	0	0.0%	1	1.3%	2	0.8%
Bank Accounts or Cash on Hand	0	0.0%	0	0.0%	1	1.6%	0	0.0%	0	0.0%	1	0.4%
Wages and Salaries	11	32.4%	28	56.0%	21	32.7%	8	40.0%	24	30.4%	92	37.2%
Dependent Care Deduction	1	2.9%	3	6.0%	3	4.7%	0	0.0%	3	3.8%	10	4.1%
RSDI Benefits	4	11.8%	1	2.0%	7	10.9%	3	15.0%	4	5.1%	19	7.7%
Supplemental Security Income (SSI) and/or State SSI Supplement	2	5.9%	0	0.0%	1	1.6%	0	0.0%	2	2.4%	5	2.0%
Unemployment Compensation	0	0.0%	0	0.0%	9	14.1%	1	5.0%	4	5.1%	14	5.7%
Worker's Compensation	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	1.3%	1	0.4%
Other Government Benefits	0	0.0%	0	0.0%	1	1.6%	0	0.0%	1	1.3%	2	0.8%
Contributions	1	2.9%	1	2.0%	0	0.0%	0	0.0%	1	1.3%	3	1.2%
Other Unearned Income	0	0.0%	0	0.0%	0	0.0%	1	5%		0.0%	1	0.4%
Child Support Payments Received from Absent Parent	1	2.9%	0	0.0%	3	4.7%	0	0.0%	4	5.1%	8	3.2%
Shelter Deduction	9	26.5%	13	26.0%	11	17.2%	3	15.0%	14	17.6%	50	20.2%
Standard Utility Allowance	4	11.8%	1	2.0%	2	3.0%	0	0.0%	5	6.2%	12	4.9%
Medical Deductions	1	2.9%	0	0.0%	1	1.6%	0	0.0%	2	2.5%	4	1.6%
Child Support Payment Deduction	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	1.3%	1	0.4%
Arithmetic Computation	0	0.0%	0	0.0%	1	1.6%	0	0.0%	0	0.0%	1	0.4%
Total	34	100%	50	100%	64	100%	20	100%	79	100%	247	100%

* Only includes active cases with errors that exceeded the threshold set by FNS.

Source: Prepared by legislative auditor's staff using data from DCFS.

**SNAP Quality Control Reviews of Negative Cases
All Errors*
Federal Fiscal Years 2018 through 2022**

Error Reason	2018		2019		2020		2021		2022		Total	
	#	%	#	%	#	%	#	%	#	%	#	%
Student Status	5	2.1%	1	0.4%	1	0.9%	0	0.0%	2	0.4%	9	0.9%
Residency	0	0.0%	1	0.4%	2	1.7%	0	0.0%	1	0.3%	4	0.4%
Household Composition	3	1.2%	3	1.3%	1	0.9%	0	0.0%	0	0.0%	7	0.7%
Recipient Disqualification	4	1.7%	6	2.5%	0	0.0%	1	1.7%	0	0.0%	11	1.0%
Employment & Training Programs	4	1.7%	5	2.1%	1	0.9%	0	0.0%	0	0.0%	10	1.0%
Work Registration	12	5.0%	21	8.8%	4	3.3%	0	0.0%	1	0.3%	38	3.5%
Social Security Number	2	0.8%	1	0.4%	1	0.9%	0	0.0%	0	0.0%	4	0.4%
Wages and Salaries	0	0.0%	4	1.7%	1	0.9%	2	3.3%	1	0.3%	8	0.8%
RSDI Benefits	0	0.0%	1	0.4%	0	0.0%	0	0.0%	0	0.0%	1	0.1%
SSI and/or State SSI Supplement	0	0.0%	1	0.4%	0	0.0%	0	0.0%	0	0.0%	1	0.1%
Standard Utility Allowance	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	0.3%	1	0.1%
Combined Gross Income	1	0.3%	3	1.3%	0	0.0%	1	1.7%	7	1.8%	12	1.1%
Combined Net Income	0	0.0%	0	0.0%	1	0.9%	0	0.0%	5	1.3%	6	0.6%
Application	25	10.3%	46	19.3%	21	17.9%	8	13.3%	78	19.8%	178	16.9%
Verification	50	20.7%	51	21.4%	22	18.8%	7	11.7%	31	7.9%	161	15.3%
Action Type	67	27.7%	36	15.2%	15	12.7%	0	0.0%	6	1.4%	124	11.8%
Other	7	2.9%	10	4.2%	5	4.3%	0	0.0%	3	0.7%	25	2.4%
Notices	62	25.6%	48	20.2%	42	35.9%	41	68.3%	258	65.5%	451	42.9%
Total	242	100%	238	100%	117	100%	60	100%	394	100%	1,051	100%

* This is the initial error; however, negative cases may have multiple errors.

Source: Prepared by legislative auditor's staff using data from DCFS.

APPENDIX E: CUSTOMER SERVICE CALL CENTER METRICS

This appendix includes Customer Services Call Center metrics for September 2021 through October 2022.

Call Center Performance Metrics for SNAP Call Line September 2021 through October 2022						
Report Month and Year	Calls*	Answered		Abandoned		Average Speed to Answer (minutes.seconds)
		#	%	#	%	
September 2021	69,330	30,351	43.8%	38,898	56.1%	50.49
October 2021	97,715	52,963	54.2%	44,746	45.8%	34.34
November 2021	59,312	49,555	83.5%	9,753	16.4%	7.40
December 2021	49,007	42,606	86.9%	6,399	13.1%	5.23
January 2022	66,558	43,100	64.8%	23,454	35.2%	21.38
February 2022	65,298	43,198	66.2%	22,097	33.8%	23.50
March 2022	61,698	43,792	71.0%	17,896	29.0%	19.42
April 2022	47,042	43,689	92.9%	3,352	7.1%	3.25
May 2022	48,984	44,466	90.8%	4,517	9.2%	4.03
June 2022	49,210	45,199	91.8%	4,001	8.1%	3.40
July 2022	53,313	46,505	87.2%	6,802	12.8%	6.30
August 2022	59,183	50,942	86.1%	8,236	13.9%	5.22
September 2022	42,742	39,863	93.3%	2,874	6.7%	1.12
October 2022	31,123	30,843	99.1%	280	0.9%	0.09

* The total number of calls does not equal the total of answered and abandoned because according to DCFS, not all calls are accounted for in the CSC metrics.
Source: Prepared by legislative auditor's staff using data from DCFS.