



Department of Human Resources
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FIA INFORMATION MEMO

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**TO: DIRECTORS, LOCAL DEPARTMENTS OF SOCIAL SERVICES,
DEPUTY /ASSISTANT DIRECTORS FOR FAMILY INVESTMENT,
FAMILY INVESTMENT SUPERVISORS AND CASE MANAGERS**

FROM: CHARLES E. HENRY, EXECUTIVE DIRECTOR

**RE: QUESTIONS AND ANSWERS FROM JUNE 2002 QUARTERLY
BRIEFINGS**

**PROGRAM AFFECTED: FOOD STAMPS, TEMPORARY CASH ASSISTANCE
TEMHA AND WORK OPPORTUNITIES**

ORIGINATING OFFICE: OFFICE OF POLICY, RESEARCH AND SYSTEMS

This Information Memo responds to questions raised during the June 2002 quarterly briefings.

TEMPORARY CASH ASSISTANCE (TCA)

Voluntary Quit

1. If a customer applies for TCA on the 55th day after voluntarily quitting a job, does the customer reapply on or after the 60th day of the quit?

Answer:

The customer may re-apply 60 days after the quit date. If the customer reapplies prior to the 60th day, the local department has the option of accepting the application and holding it until the appropriate date or having the customer reapply. Do not pend the TCA case until the 60th day.

2. If a TCA application is denied with a 566 code for voluntarily quitting a job without good cause what COMAR reference do we include on the notice?

Answer:

CARES lists COMAR citation 07.03.03.04 "You did not do what you needed to do according to regulations" on the notice. The case manager must add customer specific free-form text (to explain why the application is being denied) to the CARES notice.

Primary Prevention Initiative

1. What date do we use for verification of the PPI annual pre-school physical? Is it the calendar year or incremental date?

Answer:

Verification of having received the pre-school physical is required within 12 months of the last redetermination.

2. How do you verify school requirements for home school youngsters, 16 years of age or older? The board of education no longer registers this group since, by State law, they no longer need to be schooled.

Answer:

According to the Baltimore County Board of Education, families may voluntarily register home schooled children 16 years of age and older. If school requirements are verified, the child is not subject to TCA work requirements. Any child in a TCA household 16 years of age or older who cannot verify enrollment in school or an alternative education program or does not possess a high school diploma, must be referred to the work program.

3. Will a query on PPI disallowance cases be run on a regular basis and distributed to locals departments? If not, how will we provide the local health departments with information?

Answer:

The initial query was run to determine the extent of the problem voiced by the advocates. Another query will be run in the future to compare figures. There are no plans to produce it on a regular basis, but FIA will reconsider that if the local departments request the reports.

Reporting Changes

1. Why can't change reporting requirements for TCA customers be more uniform? Earnings must be reported 10 days from receipt of the first paycheck; the absence of a child from the household for more than 180 days must be reported within 5 days of knowledge of the extended absence; and all other changes must be reported within 10 days of the date of the change.

Answer:

The TCA program is guided by State and Federal laws and regulations as are most other programs. Wherever possible we keep TCA policy requirements uniform (and try to match them to other programs). Sometimes it isn't possible.

Income Producing Property

1. What rule is applied for income producing rental property when the income exceeds the market rate?

Answer:

Count income producing property owned by a TCA customer as self-employment earnings.

Work Opportunities

1. What WO MIS reports are best to use to track employed customers and those who have a disabled person in the household? Should (WEJ) codes (FICTR) be selected?

Answer:

The recommended WO MIS report for identifying employed or disabled TCA customers is the Caseload Report from the WO MIS Report Menu #1 (Report #6). This report lists all customers for each Eligibility Worker ID. The report uses two sources of information to show which customers are employed:

1. **CARES employment information is based on the information entered on the ERN1 and ERN2 screens. The MOE reason column shows an EI code (employed individuals).**
2. **WO MIS employment information is based on the work activities recorded. The Activity Code column shows WEJ for Unsubsidized Employment, WSU for Subsidized Private Sector Employment and WSP for Subsidized Public Sector Employment.**

Disability information is also shown in two places on this report.

1. **A code of DS will appear in the MOE Reason column for any customer who is coded in CARES with a 12 month disability on the DEM2 screen and a DEAP or SSI application pending on the UINC screen.**
2. **The DB exemption code from the CARES WORK screen is displayed in the Exempt Reason column when the customer is severely disabled.**

Note:

WO MIS tracks individuals, not cases. Since the MOE reason displayed on all WO MIS reports is based on the CARES case status, there may be some not exempt individuals in MOE cases coded with MOE Reason codes. This may occur in two-parent cases where one parent is exempt because of a disability but the other parent is required to participate in a work activity.

CARES:

1. CARES Bulletin #02-29 doesn't speak to retro Long Term Care (LTC) approvals and CARES Bulletin #02-31 speaks only to Community retro letters being corrected. What happens with LTC...?

Answer:

Instructions to the case manager to suppress the LTC notice have always been in effect. The customer should only receive a valid notice. Any case manager who did not suppress the notice to the customer and gave the instruction to discard computer notices must reinform their customers.

FOOD STAMP PROGRAM

Application Processing

1. According to action transmittal (AT) 02-67 in most circumstances we must allow the customer 60 days to provide verification before denying a food stamp application. However, according to the new CARES migration for expedited food stamps, if someone applies after June 15th and is found eligible for expedited food stamps, that customer will receive expedited food stamps for June and July. If the customer has not provided verification the case closes effective August 1st. Aren't these two pieces of policy contradictory since the customer was not given 60 days to provide verification?

Answer:

No, they are not contradictory. Action transmittal 02-67 addresses delays in processing. A case that receives expedited food stamps is considered processed.

2. If a case pends for 60 days, we let CARES close it if the household does not provide verification. CARES will close with a 230 code. We were told we could not close with that code. Is that no longer true?

Answer:

Code 230 is a system-generated code. CARES automatically denies a Food Stamp application with the 230 reason code at the end of 60 days when there is outstanding verification. This is the correct procedure.

3. For how long is a household ineligible for another expedited allotment if it does not provide verification for the on-going case?

Answer:

A customer who did not provide verification after receiving expedited food stamps cannot get expedited food stamps again until he has completed the verification requirements that were postponed, or has been certified under normal processing standards since the last expedited benefits were issued.

4. The certification period expires on 6/30. The customer comes in on 7/12. She completes a food stamp application but is not interviewed until the next day. Is the customer given 60 days to provide the necessary verification?

Answer:

Yes. Although the case manager will treat the application like a redetermination for verification purposes, it is an application and would follow the policy described in AT #02-67.

5. A homeless customer who forgot to sign the EDD called the agency. He was informed that he needed to come back to the office to sign the EDD. He did not come back in. Can the case be denied? Is it an error or a deficiency?

Answer:

This is an example of why it is important to have an address where a homeless person can pick up mail. The case manager should mail the unsigned EDD to the mailing address listed for the customer along with a 1052 requesting that the application be signed and returned. Yes, the case can be denied but the application would have to be held up to 60 days. If an active case has an application with no signature, it is a deficiency.

6. Food stamp only households receive the pink application. A one or two-person household receives a yellow application with an attached food stamp supplement. QMB applicants receive a purple application. Should the FS supplement be attached? If it is not attached, should we use that application to complete a food stamp redetermination? Should we mail the 9707 and get that back prior to completing the redetermination? Also, should all household members be sent a voter registration form?

Answer:

The purple QMB application alone does not include all the information needed to complete a food stamp recertification. The QMB application was recently revised to include a food stamp redetermination supplement. The revised application also includes the rights and responsibilities so it should not be necessary to send a 9707 for signature. They should be sent a voter registration application. Be sure to code CARES that the application was sent home and narrate the case record.

7. A household applies before 16th of the month. The customer gets expedited food stamps. Verification is returned within 30 days but in the next month. Do we need a new EDD and do we prorate benefits?

Answer:

No. No new EDD is needed if the customer provides verification within a 60-day period after the date of application. Only the initial month of application is prorated. The household is eligible for a full month's allotment in the 2nd month. If the household's case closes because it failed to provide postponed verification, the household will then have to reapply.

8. If the 30th day falls on a weekend and a customer has not returned any information as of the 29th day, which is a Friday, the case manager enters "AS" as a delay reason. CARES sends the household a letter stating the customer has an additional 10 days to return information. The customer's case will actually be denied on that Monday and not given any additional days to return verification. This procedure will confuse the customer.

Answer:

The case manager can only deny an application on the 30th day if:

- **An interview was held on the date of application, and**
- **All of the necessary verification was requested at the interview, and**
- **No requests for verification were made after the date of application, and**
- **The local department provides assistance in obtaining verification when necessary, and**
- **The household fails to provide the verification.**

If all the above criteria were met, the case manager enters the "AS" code and CARES sends the notice out. If the customer provides the necessary verification within the next 30 days the case manager will approve the case from the date the verification was provided. If the above criteria has not been met the application must be held up to 60 days.

9. A household has an active TCA or MA case. The household then applies for food stamps and is found eligible for expedited food stamps. Will entering "NO" in the verification field close the other active programs?

Answer:

If the verification is in the record for the other active cases, the case manager should not enter a "NO" in the verification field. If additional or more current verification is required for the food stamp case, the case manager should send a CARES alert for when the verification is due.

10. Many questions were asked regarding CARES procedures for processing a food stamp application after 30 days. The following procedure should be used.
- **A delay alert is received on the 29th day,**
 - **Enter the appropriate delay reason on the MISC screen**
 - **Disposition the alert**

- **If the customer does not provide the verification within the second 30 days, the case manager does not need to do anything else. CARES will deny the case.**
- **If the customer provides the verification within the second 30 days, the case manager will deny the case and re-open it effective the date the verification was provided.**
- **When the processing delay is agency caused, the customer is eligible for benefits from the date of application.**

New Hires Alerts

1. What code is used for dispositioning a new hire alert on a food stamp case that is pending for 60 days?

Answer:

Disposition the alert with a code #1 no later than the 21st day. Be sure to narrate thoroughly that since it is an application the customer has 60 days to provide verification.

Medical Expense Deduction

1. Expand and clarify policy using medical bills from Medical Assistance (MA) spend down as a medical deduction for food stamps.

Answer:

An elderly or disabled customer who has verified any incurred medical expenses he or she is responsible for is eligible for the FS medical expense deduction. Do not continue to allow the deduction, any time the customer is no longer responsible for a bill, because of MA eligibility, insurance coverage, or the bill is forgiven.

2. How far back can we consider a medical deduction? If the certification period is for a year, how far back can we go?

Answer:

Medical expenses acquired during the previous certification period may be considered regardless of how long the certification period was.

Able-bodied Adults Without Dependents (ABAWDs)

1. How long was Cecil County subject to ABAWD policy?

Answer:

Cecil County was subject to ABAWD policy from March 1, 2001 to March 1, 2002.

Immigrants

1. We need a fax number and a phone number for the Office of the United States Attorney General for reporting indigent immigrants and the sponsor.

Answer:

All indigent immigrants are to be reported to the US Attorney General by mail. The Food and Nutrition Service (FNS) provided the mailing address but did not provide a fax number or phone number. Mailing the referral will not hold up processing since we do not need to follow up after the names are mailed.

Change Reporting

1. The case manager requests verification. The customer does not provide the requested verification but the worker obtains the proof on his own. What happens to the case? Is it closed? Is this an IPV situation? Example: The customer was requested to provide school verification due to a previous IPV sanction. The customer received food stamps for a child that was no longer in the home. The customer did not provide the verification. The case manager faxed a school form to the school, which provided proof that the child had been withdrawn from the school and is residing in another state. Should the case be closed? How should it be treated?

Answer:

The household situation must be reviewed prior to taking any action because there are several answers.

Simplified Reporting Households

- **If the household was in simplified reporting and the child left the home during the current certification period, the case manager would remove the child from the food stamp household effective the date verification was received that the child was not in the home and there would be no overpayment.**
- **If a simplified reporting household failed to report that the child was not in the home at the recertification interview, it may be a potential fraud case and should be referred to the Office of the Inspector General (OIG). An overpayment should be completed effective the date of the interview in which the household failed to report the change.**

Other Food Stamp Households

- **If the household is not in the simplified reporting group, there may be fraud and the case manager should refer the case to the OIG investigator for potential fraud. The case manager would remove the child from the case and an overpayment (OP) would be completed if**

creating the OP would not interfere with the fraud investigation. The overpayment would be effective back to the date in which the child left the home.

See the revised Food Stamp Manual sections 490 - Claims Against Households and 480 – Intentional Program Violation for more detail.

2. A household applies for food stamps on June 17th. The household meets expedited criteria. The system sets ongoing benefits without allowing a shelter deduction because the expenses were not verified. If the customer provides the shelter verification prior to 6/30 and you go into "R" for 7/02, will 7/02 food stamps be adjusted based on the now verified shelter expenses?

Answer:

When a household meets expedited criteria, the FS benefit is usually issued using the customer's statement. In this example, the case manager would allow the declared shelter expenses, for June and July, even if the household had not verified them. The household should have been able to give an accurate amount for the shelter expenses and in most cases would not require a supplement. The case manager would remove the shelter costs for the August benefit if the household does not bring in the postponed shelter verification. Failure to verify shelter costs does not effect eligibility.

Redetermination

1. A food stamp case closes because the household did not come in for its redetermination. The customer reapplies in the first no pay month, is it treated as an application or redetermination?

Answer:

It is treated as an application (screen for expedited), although the case manager will treat the application like a redetermination for verification purposes.

INQUIRIES:

Please direct policy questions to TCA: Juanita Brouwer at 410-767-7683, FS to Suzanne Ross at 410-767-4369, TEMHA to Rick McClendon at 410-767-8513, and Work Opportunity (WO MIS) to Mark Millspaugh at 410-767-8558. CARES questions should be directed to Gina Roberts at 410-238-1297.

cc: FIA Management Staff
Constituent Services
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