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TO: **Income Maintenance Supervisors**  
**Income Maintenance Lead Workers**  
**Income Maintenance Staff**  
**W-2 Agencies**  
**Workforce Development Boards**  
**Job Center Leads and Managers**  
**Training Staff**  
**Child Care Coordinators**

FROM: Shawn Smith, Bureau Director  
Bureau of Enrollment Policy & Systems  
Division of Health Care Access and Accountability

DHS OPERATIONS MEMO			
No:	DHS 14-40		
DATE:	9/15/2014		
FS	<input checked="" type="checkbox"/>	MA	<input type="checkbox"/>
SC	<input type="checkbox"/>	CTS	<input type="checkbox"/>
		BC+	<input type="checkbox"/>
		FSET	<input type="checkbox"/>

**SUBJECT: FoodShare Intentional Program Violations (IPV) System Updates**

**CROSS REFERENCE:** [IMM Chapter 13](#); [FoodShare Handbook 3.14.1](#); [Process Help 44.3.8](#)

**EFFECTIVE DATE:** September 29, 2014

**PURPOSE:**

The purpose of this memo is to announce the implementation of a new CARES Worker Web (CWW) automatic, real time update of IPV sanction information imposed by other states based on information received from the Food and Nutrition Service (FNS) via the Disqualified Recipient System (eDRS) process. The update will occur at application, renewal, person add, program add and Six Month Reporting (SMRF). The goal of automatically updating this information in CWW is to improve program integrity as well as reduce the workload associated with manually querying and updating the information.

**BACKGROUND:**

Workers have been required to query IPV sanctions using DXQI (a national master database for all IPV sanctions) from other states and enter that information on the IPV page in CWW. A monthly automatic batch process also updates new information for ongoing FoodShare (FS) members. FNS of the United States Department of Agriculture requires states to report all IPV determinations to a national database of Disqualified Recipients. The screens on CARES used to record IPV information, to report to the national database, and to query IPV information from that national database, are described collectively as the Disqualified Recipient Subsystem

(DRS). FNS updates the DRS database monthly with new data on individuals who have been sanctioned for FS IPV's throughout the country. New applicants and individuals with demographic or Social Security Number (SSN) changes are compared daily against the DRS database received from FNS. When a sanction occurs, the information updates the IPV page from the Disqualified Recipient Subsystem and must be verified.

FNS is changing this process to a real time internet query of the eDRS (Electronic Disqualified Recipient Subsystem).

***POLICY:***

There are no policy changes with this update.

***CARES:***

***INTENTIONAL PROGRAM VIOLATION (IPV) PAGE***

At application, renewal, person add, program add and SMRF, CARES will automatically query eDRS for individuals over 18 with a valid SSN (e.g., C or V). This call is made from the General Case Information page at review, at SMRF (when a SMRF is recorded CMP {complete}) and from the Benefits Received page for all other scenarios. If IPV information is found from another state, the IPV page will automatically update for all individuals (regardless of a FS request) if that IPV sanction doesn't already exist in CARES. For those cases requesting FS, the IPV page will be scheduled in the driver flow and an informational message will display "New FS IPV has been added. Contact other state agency for verification". If the CARES demographic information does not match eDRS, an informational message will display on the IPV page: "CARES demographic information and eDRS demographic information do not match". The IM agency must contact the other state to verify the information on the IPV match, if it is determined that it is in error (e.g., incorrect entry by the other state, another person is using the SSN of the Wisconsin FS member), the worker can delete the IPV from CARES. The worker must document why and how this was verified. The other state must also update the IPV information or it will likely update again the next time the eDRS query is called (e.g., review, SMRF, etc.).

In very rare situations, other states may delete previously entered IPV's in eDRS and an alert will be sent to the worker: "507 – FS IPV DELETED; RUN Eligibility." In this situation, workers must determine if benefits should be restored based on the incorrect IPV imposed from the other state.

Reminder: IPV's from other states require secondary verification and documentation in the Electronic Case File (ECF) for that IPV to be imposed.

FOODSHARE IPV SANCTION PAGE:

**CARES Worker Web** User ID: XCTK76 User Name: P KIERN Quick Select: CASE/RFA Help Logout

Primary Person: TESTING HSUA 34F PP Case: 7002641778 Status: Pending Mode: Intake 3.5 08/05/2014

Action Items (3) Documents (0) Discrepancies (0) Work Items (1)

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**Navigation Menu**

- Search
  - CARES Home
  - Search
  - Inbox Search
  - Unlinked Documents
- RFA / Case
  - Client Registration (0)
  - Case Summary
  - Case Comments
  - Expected Changes
  - Application Entry (2)
    - Case Information
    - Individual Demographics
    - Benefits/School
    - Individual Non Financial
      - Summary
      - Gatepost
      - Pregnancy
      - Disability
      - MAPP
      - Prior SSI
      - Newborn
      - Drug Felon
      - CC IPV Penalty
      - FS IPV Sanction
      - W-2 IPV Penalty
      - Room and Board Paid
      - Youth Exiting Out-of-Home Care
      - Absent Parent
      - Other Health Care

**FoodShare IPV Sanction** Cancel [ ] Reset Total: 1

**Effective Period**  
 Last Updated: 08/05/2014  
 Delete Reason: [ ]

**Details**

**Individual Information**  
 Individual: TESTING HSUA 34F PP

**Individual Information - eDRS Details** *New Headers*

First Name: TESTING MI: Last Name: HSUA  
 Birth Date: 01/01/1980 Gender: Female  
 Match Date: 08/05/2014

**Sanction Details**

Intentional Program Violation Number: 1  
 Type of Offense Code: B1 - TRAFFICKING CONVICTION (INCLU...  
 Sanction Duration in Months: 999 Reason for Override: [ ]  
 Override Begin Date: MM/DD/YYYY Override End Date: [ ]  
 Decision Date: 08/05/2014 State Identifier: 7007789854  
 Sanction Begin Date: 09/01/2014 Sanction End Date: [ ]  
 Action Code: Add Status: S

**Contact Details**

Original Local Agency: Local Agency: 0079  
 Contact Title: DRS VERIFIER County: 40  
 Contact Organization: TEST MILWAUKEE CO Phone: 414-289-6194  
 State Code: WI WISCONSIN

**Comments**  
 Comment: Just testing comments.....  
 Current Size = 27 characters (1000 characters max.)

**Obsolete Information**  
 Verification (Decision Date): [ ]

**Link benefit recovery referral to Food Share**

Link	Referral Number	Referral Date	Case	Category	Sequence	Referral County	Error Type	Adjusted Claim Amount
No data found.								

Individual: TESTING HSUA 34F PI Sequence: [ ] Updated on or before: MM/DD/YYYY Go [ ] [ ] [ ]

Add Case Comment Cancel [ ] Previous Next

*Added comment section.*

DATA EXCHANGE QUERY PAGE:

Workers will be able to query the eDRS database directly by SSN or PIN number with a new option from the Data Exchange Query page. If IPV information is found, it will automatically update on the IPV page and the worker will have to navigate to that page to view the updated information.

DXIL:

In July, a survey was sent out to Consortia and Tribal agencies asking their preference for the agency contact information to be displayed on Wisconsin IPV's sent to other states for each agency in their Consortia. DXIL has been updated based on the responses from Consortia.

IPV REMINDERS:

IPV determination information should be entered into CARES as soon as possible after the date of decision. The system imposes the disqualification period on the individual within 45 days following the date of the IPV determination. Data for FoodShare Program IPV is entered on the IPV page in CWW. This screen serves as a dual purpose-to track sanctions here in Wisconsin (entered by the Office of Inspector General and IM Agencies) and to provide sanction information from other states.

Tips To Ensure IPV Takes Effect:

If a case has Transitional FoodShare (TFS), TFS must be closed in order for the IPV to take effect. When processing a regular FS request, verify from the FS Budget page that the assistance group is accurate once the individual with the IPV is removed from the allotment.

Once an IPV is imposed, all violations occurring before the 1st IPV cannot be used to pursue a 2nd IPV. A 2nd IPV can only be pursued if the violation occurred after the first IPV is imposed and a 10 day notice is given. If a 2nd IPV is granted during the sanction period of the 1st IPV, it must be entered immediately. There may be instances in which IPV's are running simultaneously, and therefore the sanction time period may not be as long as it would have been had the IPV's

been separate. Only a court can rule a start date of an IPV that goes beyond the 45 day time limit.

**Examples:**

**1st IPV:** Joe has an IPV for not reporting income. The IPV is entered into CARES on 7/20/14 and the sanction begins 8/1/2014. On 8/11/14, it is discovered that Joe did not report his child out of the home in 2013. Because this second violation occurred before 7/20/14, the agency cannot pursue a 2nd IPV, but an overpayment can be determined.

**2nd IPV:** On 8/11/14, investigators identify that Joe committed a 2nd IPV when he sold his FoodShare for cash at a grocery store on 8/5/14. A 2nd IPV can be pursued because the violation occurred after 7/20/14. In June, 2014, the fair hearing information was removed from IPV notices. Once an IPV hearing is done, the member's only recourse is to appeal to circuit court, but no more than 30 days from the decision date. However, a FS member can always appeal the amount of the allotment at any time ([FSHB 6.4.1](#) "A fair hearing may be requested at any time within a certification period if a food unit disagrees with their current amount of FS benefits").

**CONTACTS:**

BEPS CARES Information & Problem Resolution Center

\*Program Categories – FS – FoodShare, MA – Medicaid, BC+ – BadgerCare Plus, SC – SeniorCare, CTS – Caretaker Supplement, FSET – FoodShare Employment and Training.

DHS/DHCAA/BEPS/LT