



Date: December 15, 2015

DHCAA Operations Memo 15-48

To: Income Maintenance Supervisors
Income Maintenance Lead Workers
Income Maintenance Staff

Affected Programs:	
<input type="checkbox"/> BadgerCare Plus	<input type="checkbox"/> Caretaker Supplement
<input checked="" type="checkbox"/> FoodShare	<input type="checkbox"/> FoodShare Employment and Training
<input type="checkbox"/> Medicaid	
<input type="checkbox"/> SeniorCare	

From: Shawn Tessmann, Bureau Director
Bureau of Enrollment Policy and Systems
Division of Health Care Access and Accountability

Clarification of FoodShare Renewal Verification Policy

CROSS REFERENCE

- 7 C.F.R. § 273.14(e)(2)
- FoodShare Wisconsin Handbook, [Section 2.2.1.4 Review Processing Timeframe](#) and [Section 1.2.1.2 Request for Verification](#)
- Process Help, [Section 3.13 Break In Service Case Processing for FoodShare](#)

EFFECTIVE DATE

January 9, 2016

PURPOSE

The purpose of this Operations Memo is to clarify FoodShare renewal verification policy.

BACKGROUND

Per 7 C.F.R. § 273.14(e)(2), if an agency cannot process a FoodShare renewal in the renewal month due to a household's delay, the agency must send the household a Notice of Decision. The Notice of Decision must indicate that the household's eligibility can still be determined without requiring a new application if the interview is completed by the end of the renewal month and the requested verifications are submitted within one month following closure of the FoodShare benefit. If the verifications are submitted in the month following closure, FoodShare benefits would then be prorated from the date the verification requirements are met.

POLICY

Per current policy, a FoodShare household must complete a renewal, which includes completing the interview and submitting the requested verifications, within the renewal month or the household may

experience a loss in benefits and/or need to complete a new application. If a FoodShare household fails to complete a renewal by adverse action of the renewal month, a Notice of Decision is issued indicating that benefits will be terminated at the end of the renewal month if the renewal is not completed.

If the household fails to complete the interview and submit the requested verifications by the end of the renewal month, the household's benefits will be terminated.

If the household completes the interview but fails to submit the requested verifications by the end of the renewal month, the household's benefits will be terminated at the end of the renewal month; however, the household will have the month following closure to submit the requested verifications without needing to complete a new application. If the household submits the requested verifications within one month following closure, break-in-service policy and procedures apply (see [Process Help, Section 3.13 Break In Service Case Processing for FoodShare](#)). When break-in-service policy is applied, the household's benefits are prorated from the date the verification requirements are met. Failure to submit the requested verifications within one month following closure requires the household to complete a new application.

CARES

NOTICE OF DECISION

Starting January 9, 2016, the Notice of Decision that is issued when a FoodShare household fails to complete a renewal prior to adverse action in the renewal month will include a message informing the household that they must provide requested verifications within one month following closure to continue receiving benefits without having to submit a new application. This message will display in addition to existing messages and will differ depending on whether or not an interview has been completed.

INTERVIEW COMPLETED BUT VERIFICATIONS NOT SUBMITTED BY ADVERSE ACTION

If a household has completed an interview but has not yet submitted the requested verifications, the Notice of Decision that is issued at adverse action will include the following new message (reason code 728) in addition to the existing message indicating a failure to renew (reason code 077):

To keep getting benefits without having to submit a new application, you must provide any proof asked for on the "Notice of Proof Needed" within one month of your benefits ending.

Example 1: February is the renewal month. The interview was completed on February 5, and the verifications were due on February 15 (10-day due date); however, the verifications were not submitted by February 15. As a result, when adverse action ran on February 16, the household received the following messages on the Notice of Decision:

 **Your FoodShare Benefits**

 Who is NOT enrolled in FoodShare and why?	
When?	Who and Why?
As of Mar. 01, 2016	<p>TEST: To keep getting benefits without having to submit a new application, you must provide any proof asked for on the "Notice of Proof Needed" within one month of your benefits ending.</p> <p>TEST: Your renewal has not been completed. If you have not started your renewal and want to keep getting this benefit, contact your agency before the end of this month.</p>

Figure 1 Messages on the Notice of Decision If Interview Has Been Completed But Verifications Have Not Been Submitted

INTERVIEW NOT COMPLETED AND VERIFICATIONS NOT SUBMITTED BY ADVERSE ACTION

If a household has **not** completed an interview and has not submitted the requested verifications, the Notice of Decision that is issued at adverse action will include the following new message (reason code 727) in addition to the existing message indicating a failure to renew (reason code 077):

To keep getting benefits without having to submit a new application: 1) Complete your required interview by calling your agency at the phone number listed on page 1 before your benefits end; 2) Provide any proof asked for on the "Notice of Proof Needed" within one month of your benefits ending.

Example 2: February is the renewal month. The household did not start the renewal by February 15. As a result, when adverse action ran on February 16, the FoodShare benefit closed for lack of review, and the household received the following messages on the Notice of Decision:

 **Your FoodShare Benefits**

 Who is NOT enrolled in FoodShare and why?	
When?	Who and Why?
As of Mar. 01, 2016	<p>TEST: To keep getting benefits without having to submit a new application: (1) Complete your required interview by calling your agency at the phone number listed on page 1 before your benefits end; (2) Provide any proof asked for on the "Notice of Proof Needed" within one month of your benefits ending.</p> <p>TEST: Your renewal has not been completed. If you have not started your renewal and want to keep getting this benefit, contact your agency before the end of this month.</p>

Figure 2 Messages on the Notice of Decision If Interview Has Not Been Completed and Verifications Have Not Been Submitted

VERIFICATIONS NOT SUBMITTED BY THE 10-DAY DUE DATE

If a household has completed an interview and verification was requested but not received by the 10-day due date, which was prior to adverse action, the worker should enter “NV” in the verification fields and run eligibility. As a result, the Notice of Decision that is issued will include the following new message (reason code 728) in addition to the existing message indicating a failure to provide verification (reason code 112):

To keep getting benefits without having to submit a new application, you must provide any proof asked for on the “Notice of Proof Needed” within one month of your benefits ending.

Example 3: February is the renewal month. The interview was completed on February 2 and the verifications were due on February 13; however, the verifications were not submitted. On February 14, the worker entered “NV” for the missing verifications and ran eligibility. As a result, the household received the following messages on the Notice of Decision:

 **Your FoodShare Benefits**

 Who is NOT enrolled in FoodShare and why?	
When?	Who and Why?
As of Mar. 01, 2016	<p>TEST: To keep getting benefits without having to submit a new application, you must provide any proof asked for on the "Notice of Proof Needed" within one month of your benefits ending.</p> <p>TEST: You did not provide the required proof of your answers to the agency. See the "Notice of Proof Needed" that was sent to you for more information.</p>

Figure 3 Messages on the Notice of Decision If Verifications Were Not Submitted by 10-Day Due Date (Prior to Adverse Action)

Note: The new message (reason code 728) will also display on notices for open, ongoing FoodShare benefits that close when a household fails to provide verification by the 10-day due date.

BREAK IN SERVICE

Starting January 9, 2016, CARES Worker Web (CWW) will be configured to correctly apply renewal periods and renewal closures and to allow a break in service for verifications submitted in the month following a renewal closure. As a result, for cases in which an interview has been completed in the renewal month and verification has been submitted in the month following the renewal closure, workers must complete the FS Break in Service page in CWW with the appropriate information, including dates, and run eligibility. CARES Worker Web will then reopen the case, establish the new certification period, issue a prorated benefit, and generate notices that contain text appropriate for an ongoing case.

The screenshot shows a web form titled "FS Break in Service". At the top right, there are "Cancel" and "Reset" buttons. The form is divided into two main sections: "Effective Period" and "Break in Service Details".

Effective Period

* Begin Month:	Last Updated:
	Worker ID:

Break in Service Details

Is this case a break in service?

Date when the requirements are met

At the bottom right, there is a navigation bar with "Enter New Begin Month:" and "Go" buttons, along with navigation arrows.

Figure 4 FS Break in Service Page

VERIFICATIONS DUE IN THE MONTH FOLLOWING RENEWAL

Per current policy, all households must be allowed 10 days to provide verifications. If the verification due date is in the month following the renewal month, the FS Break in Service page will need to be completed so that CWW explores eligibility for FoodShare (workers should not use the FoodShare Request page in this case). Workers will need to enter the first of the month in the Date when the requirements are met field when verifications are received timely to ensure that FoodShare eligibility is explored, a full month of benefits is issued, the correct language is applied on notices, and the correct certification period is established.

If the verifications are received after the due date and in the month following closure, workers should enter the date the verification(s) were received on the FS Break in Service page so that benefits are prorated. Workers should enter case comments documenting the actions taken.

This screenshot is identical to Figure 4, showing the "FS Break in Service" form with the same sections: "Effective Period" (Begin Month, Last Updated, Worker ID) and "Break in Service Details" (Is this case a break in service?, Date when the requirements are met).

Figure 5 FS Break in Service Page

Example 4: February is the renewal month. The renewal was processed at the end of February, and the verifications were due March 8. Verifications were submitted on March 6. Since verifications were submitted timely, the worker entered "03/01/YYYY" in the Date when the requirements are met field on the FS Break in Service page so that the full month of benefits was issued. (CARES Worker Web will not explore FoodShare when eligibility is run unless the FS Break in Service page is completed.) The worker entered case comments documenting the actions taken.

INTERVIEW COMPLETION DATE

In addition, starting January 9, 2016, CWW will be configured to recognize the date on which an interview is completed. Renewal interviews will need to take place no later than the last day of the

renewal month. If an interview is completed in the month following the renewal month, FoodShare eligibility will not be explored, and FS X (no assistance group for FoodShare) will be built unless the begin month and program filing date are updated on the FoodShare Request page. When the FoodShare Request page is updated after the renewal month, CWW will consider this to be an application. The application driver flow will need to be initiated and all application rules and logic will be applied, including the issuance of expedited benefits and application notice language.

Note: When the begin month and program filing date are updated on the FoodShare Request after the renewal month, CWW will view the action as an application and expedited benefits will be issued if the household meets the criteria for expedited benefits.

The screenshot shows a web form titled "FoodShare Request". At the top right, there are "Cancel" and "Reset" buttons. The form is divided into two sections: "Effective Period" and "Request Details".

Effective Period			
* Begin Month:	11/2015	Last Updated:	11/12/2015

Request Details			
* Program Filing Date:	11/12/2015	* Requesting this Program / Subprogram of Assistance?	Yes
Do you request FoodShare separately for elderly and disabled persons unable to purchase and prepare meals due to disability?			No

Figure 6 FoodShare Request Page

Example 5: November is the renewal month. The member called on December 1 to complete his or her interview. Because the interview was not completed in the renewal month, a new application and filing date were needed in order for CWW to determine FoodShare eligibility. The worker entered case comments documenting the member's delay in completing the interview within the renewal month as well as the actions that were taken.

Example 6: November is the renewal month. The member called on November 30 to complete the interview; however, the agency was unable to complete the interview the same day. Using agency delay policy, the interview was scheduled for December 6. After the interview was completed on December 6, the worker updated the program filing date on the FoodShare Request page to the first of the month (12/01/YYYY) so that a full month of benefits was issued and ran the application driver flow so that CWW explored FoodShare eligibility. The worker entered case comments documenting the agency's delay as well as the actions that were taken.

CONTACTS

BEPS CARES Information and Problem Resolution Center