



Date: September 9, 2016

DHCAA Operations Memo 16-29

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

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

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**Process and System Changes Related to the FoodShare Work Registration Requirements**

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## CROSS REFERENCE

- FoodShare Handbook, [Section 3.16.1 Work Requirements](#) and [Section 3.17.1 Able-Bodied Adults without Dependents \(ABAWDs\)](#)
- Operations Memos [14-25](#), [14-27](#), [14-55](#), [16-07](#)

## EFFECTIVE DATE

September 24, 2016

## PURPOSE

The purpose of this Operations Memo is to clarify policy and announce process and system changes related to FoodShare work registration, also referred to as the general FoodShare work requirement. These changes will be implemented on September 24, 2016.

## BACKGROUND

Process and system changes related to the work registration requirements are being implemented to more accurately support policy requirements. As a result of these changes, the Department of Health Services (DHS) will be better able to serve and track work registrants in accordance with federal reporting requirements. The work registration requirements are not new.

Effective September 24, 2016, FoodShare applicants and members will be subject to a more detailed application and interview process to determine their work registration status. The process will automate sanctions for failure to meet the FoodShare work registration requirements. Work registration status will be applied to the following:

- FoodShare applications with a filing date on or after September 24, 2016
- FoodShare renewals with an eligibility run date on or after September 24, 2016
- Cases that have a Loss of Employment page created on or after September 24, 2016.

## **POLICY**

All FoodShare applicants or members ages 16 through 59 must comply with the work registration requirements as a condition of FoodShare eligibility, unless they meet an exemption. Applicants or members who do not comply with the work registration requirements are sanctioned from receiving FoodShare benefits. The work registration requirements are different from the work requirement for certain able-bodied adults without dependents (ABAWDs) that was implemented statewide on April 1, 2015.

### ***REGISTERING FOR WORK***

Registering for work occurs at the time of application and renewal, and every 12 months after initial enrollment in FoodShare. An applicant or member who signs the FoodShare application or renewal registers all food unit members for work. Work registration is completed when the agency receives **any** of the following:

- A signed Request for Assistance (RFA) after the Client Registration page is completed in CARES Worker Web (CWW)
- A signed page 1 of the FoodShare Wisconsin Application/Registration and Important Information form (F-16019A)
- A completed and signed FoodShare Wisconsin Application/Registration form (F-16019B)
- An ACCESS application containing an electronic signature
- A signed signature page from the CARES case summary
- A completed telephonic signature

### ***WHO IS REQUIRED TO REGISTER FOR WORK***

FoodShare applicants and members ages 16 through 59 must comply with the work registration requirements as a condition of FoodShare eligibility, unless they meet an exemption. An applicant or member is required to register for work the month after he or she turns 16 and is exempt starting the month he or she turns 60.

**Note:** Not all work registrants are ABAWDs. ABAWDs are a subset of work registrants.

### ***WORK REGISTRATION EXEMPTIONS***

Some FoodShare applicants and members are exempt from the work registration requirements. CWW is being updated to help workers identify individuals who are exempt (more detail regarding changes to CWW is included in the CARES section of this Operations Memo).

The following applicants and members are exempt from the work registration requirements:

- A person 16-17 years of age who is not the primary person in a household.
- A person 16-17 years of age who is the primary person in a household but who is enrolled in school or in an employment and training program at least half-time.
- A person determined unfit for employment, which includes a person who is one of the following:
  - o Receiving temporary or permanent disability benefits from the government or a private source.
  - o Mentally or physically unable to work, as determined by the income maintenance (IM) agency.
  - o Verified as unable to work by a statement from a health care professional or a social worker.
- A person participating in and complying with the Wisconsin Works (W-2) work requirement.

**Note:** If a person is open for W-2 in CWW, he or she is in compliance with the W-2 program work requirement.

- A parent or other household member who is the primary caregiver for a dependent child younger than 6 years old (whether the child lives in the home or out of the home). If two people are exercising parental control of a child, only one of those people can be exempt from work registration as the primary caretaker of that child.
- A parent or other household member who is the primary caregiver for a person who cannot care for himself or herself (whether the person lives in the home or out of the home).
- A person who has applied for or is receiving unemployment compensation.
- A person regularly participating in an alcohol or other drug abuse (AODA) treatment or rehabilitation program.
- An employed or self-employed person working 30 or more hours per week or earning wages equivalent to 30 or more hours per week at the federal minimum wage.
- A person who is enrolled at least half-time in any recognized school, training program, or institution of higher education.
- A person receiving Transitional FoodShare benefits.

#### ***WORK REGISTRATION EXEMPTION VERIFICATION***

When determining FoodShare eligibility, only exemptions that will impact eligibility require verification and will display on the verification checklist. Verification for an exemption from the work registration requirements is not required unless the exemption is questionable. A questionable exemption will appear on the work registrant/ABAWD verification checklist and will not pend eligibility.

**Note:** The name of the ABAWD verification checklist is changing to work registrant/ABAWD verification checklist. Modifications are being made to the work registrant/ABAWD verification checklist to request verification for both work registration and ABAWD exemptions.

**Example 1:** Craig is 20 years old and reported that he is exempt from the work registration requirements because he is in a drug treatment program. Craig would be determined eligible for FoodShare and the work registrant/ABAWD verification checklist would be sent.

#### ***EXPLANATION OF WORK REGISTRATION REQUIREMENTS DURING EACH FOODSHARE INTERVIEW***

**During each FoodShare interview, IM workers must do the following:**

- Ask relevant questions and gather necessary information to identify the correct work registrant status and ABAWD determination in CWW.
- Ask relevant questions to assist in discovering potential exemptions.
- Provide applicants or members with information on exemptions so that they may recognize any current or future exemptions for themselves or a household member.
- Review prior sanctions documented on the Loss of Employment pages for accuracy and potential good cause.

During the FoodShare interview, IM workers must explain the FoodShare work registration requirements, the rights and responsibilities of work-registered food unit members, and the consequences of failure to comply with the work registration requirements. Workers must differentiate

between the FoodShare work registration requirements and the ABAWD work requirement. A sample script is attached to this Memo ([see Operations Memo attachment #1](#)).

### ***WORK REGISTRATION POLICY COMPLIANCE***

Information provided in this section should be used in the FoodShare interview process to help applicants and members understand how to comply with the work registration requirements. Compliance with the work registration requirements includes registering for work at the time of application and every 12 months thereafter.

To maintain compliance after registering for work:

- A person who is working a job of 30 or more hours per week (or a job with earnings equivalent to 30 or more hours per week at the federal minimum wage) must not quit that job. The converted monthly amount (i.e., the amount of monthly earnings calculated based on average weekly earnings) should be used.  
**Note:** Quitting a job of 29 or fewer hours per week should not result in a sanction, unless the weekly earnings prior to quitting were greater than 30 hours times the federal minimum wage.
- A person who is working 30 or more hours per week must not reduce work hours to less than 30 per week. If a person reduces hours to less than 30 per week, but continues to earn weekly wages greater than 30 hours at the federal minimum wage, a sanction should not be applied. The converted monthly amount should be used.
- A person who receives a bona fide offer of suitable employment must accept that offer.
- A person who has applied for or is receiving unemployment compensation must continue to comply with the unemployment compensation program work requirements.
- A person participating in a W-2 placement must continue to comply with the W-2 program work requirement.  
**Note:** If the person is open for W-2 in CWW, the person is in compliance with the W-2 program work requirement.

### ***WORK REGISTRATION POLICY NONCOMPLIANCE***

A person is considered to be noncompliant if he or she does not meet the work registration requirements noted above. A person who does not comply with the work registration requirements, and does not have good cause, will be sanctioned from receiving FoodShare benefits. An event that results in a sanction has historically been referred to as a voluntary quit or a reduced work effort (VQT). These events are now referred to as sanction events.

Acts of noncompliance that may result in a sanction and that are reported by the applicant or member are generally not questionable; the IM worker should not pend the application or renewal for verification of the sanction event unless there is conflicting or questionable information.

### ***SANCTION EVENTS***

The following are sanction events:

- Turning down suitable employment. The following must all be true for a job to be considered suitable employment:
  - o Pay is equivalent to minimum wage or higher.
  - o The employee is not required to either join or quit a union or trade organization.
  - o The job is not obtained due to strike or lockout.
  - o The job does not pose health risks.

- o The job matches a person's physical and mental ability to perform the job.
- o If employment is offered on a piece-rate basis, the expected average hourly pay (piece-rate\* average hourly output) is at least minimum wage.
- o The daily round-trip commuting time is less than two hours, excluding time transporting a child to or from child care.
- o The distance to the job allows for walking, or public or private transportation is available.
- o The hours of work or nature of work does not interfere with the person's religious observations, convictions, or beliefs.
- o Within the first 30 days of work registration, the employment must be in the person's field of experience.
- Quitting a job of 30 or more hours per week (or a job with earnings equivalent to 30 or more hours per week at federal minimum wage). The converted monthly amount should be used.  
**Note:** Quitting a job of 29 or fewer hours per week should not result in a sanction, unless the weekly earnings prior to quitting were greater than 30 times the federal minimum wage.
- Voluntarily reducing hours worked to less than 30 per week. Reducing hours to less than 30 per week, but continuing to earn weekly wages greater than 30 hours at the federal minimum wage, would not result in a sanction. The converted monthly amount should be used.
- Previously participating in a W-2 placement that has closed for failing to meet the W-2 work requirement.  
**Note:** The reason for closure needs to be explored with the applicant or member.
- Applying for or receiving unemployment and failing to meet the unemployment work requirement.

It is possible that a FoodShare applicant or member who is exempt from the work registration requirements could be sanctioned for noncompliance. FoodShare applicants or members who are initially exempt from meeting the work registration requirements solely due to working, applying for or receiving unemployment compensation, or participating in W-2, but who commit an act of noncompliance resulting in the loss of the exemption without good cause will be sanctioned. If there are any additional exemptions for this applicant or member, a sanction should not be applied.

### **GOOD CAUSE**

When considering whether a potential sanction event has taken place, workers are required to consider the reasons leading to the event in order to determine if there was good cause. When good cause exists, a sanction should not be applied.

Reasons for good cause include, but are not limited to, the following:

- The job did not meet the suitable employment criteria, as described under Sanction Events in this Operations Memo.
- The applicant or member was fired or resigned at the employer's demand.
- The employer discriminated based on the applicant or member's age, race, sex, color, handicap, religious belief, national origin, or political belief.
- Work demands or conditions made continued employment unreasonable (e.g., working without being paid timely).
- The applicant or member accepted other employment at a wage equivalent to working 30 or more hours per week at federal minimum wage.
- The applicant's or member's work hours were reduced to less than 30 hours per week, but wages earned are equivalent to working 30 or more hours per week at the federal minimum wage.

- The applicant or member enrolled at least half-time in any recognized school, training program, or institution of higher education that requires him or her to leave employment.
- There were changes in the food unit residence that impacted access to current employment (e.g., members of the food unit moved to another community because a member accepted a new job or enrolled at least half-time in a recognized school, training program, or institution of higher education).
- The applicant or member has personal health problems, or others in the food unit have health problems.
- The applicant or member is under age 60 and resigned from a job that the employer recognized as retirement.
- The applicant or member quit in the context of the natural pattern of employment, such as a migrant worker or construction laborer.
- Hours of employment were reduced by the employer without consent from the applicant or member, but the employer remained the same.
- The applicant or member quit unsubsidized employment to join a volunteer program, such as Volunteers In Service To America (VISTA), AmeriCorps, etc.
- Transportation was not available.
- The applicant or member was unable to obtain adequate child care for a child or children younger than age 12.
- The applicant's or member's self-employment ended.
- There were other circumstances beyond the applicant's or member's control that the agency feels constitute good cause.

**Example 2 (sanction event resulting in a sanction):** John reports that he quit his job because he doesn't like his boss. No good cause exists.

**Example 3 (sanction event not resulting in a sanction due to good cause):** John reports that he quit his job because his boss was creating a hostile work environment by harassing him for his religious beliefs. Good cause exists.

Verification of good cause is not required unless the reason for good cause is questionable. If an IM worker receives conflicting or unclear information about the good cause reason, verification must be requested to clarify the circumstances.

**SANCTION PERIOD**

Sanctions will be systematically applied for the time periods indicated below. During a sanction period, if the applicant or member remains part of a food unit, he or she will be a gross deemer for the purpose of income and deduction budgeting (i.e., his or her income and expenses will be used in the FoodShare benefit determination for the rest of the food group).

Sanction Occurrence	Time Period for Sanctions Applied at the Time of Application (days)	Time Period for Sanctions Applied to Ongoing Cases (benefit months)*
1st	30 days	1 month
2nd	90 days	3 months
3rd and subsequent	180 days	6 months

\* In instances where a break in service occurs, the sanction applies from the first date that eligibility is regained and runs for the remainder of that benefit month.

#### ***SANCTION PERIOD AT APPLICATION***

If a sanction event occurs within 30 days of the application filing date, without good cause, the applicant or member will be sanctioned from receiving FoodShare benefits as of the application filing date.

An application is not eligible for expedited FoodShare issuance if there is a sanction event. An interview is required to determine if there is a sanction event. When the interview is postponed, the worker must issue expedited FoodShare benefits within seven days from the application filing date. The worker is required to determine sanction events and good cause in the interview. A sanction will start the eligibility month after expedited FoodShare benefits have been issued.

**Example 4:** Joe completes an application on December 6 and the agency is unable to reach him for the interview. Joe reports no income or assets and he is otherwise eligible, so the agency postpones his interview and issues expedited FoodShare benefits for the month of December. Joe comes into the agency on December 20 and completes his interview. Joe reports he quit his job on November 26 and has no exemption or good cause. Joe is otherwise eligible so the worker confirms the closing of his FoodShare case, and CWW applies his first sanction beginning January 1.

If an applicant's or member's FoodShare eligibility is failing for another reason (e.g., the applicant or member did not verify information), a sanction will not be applied at the time of application.

**Example 5:** Jack applies for FoodShare on August 8. Jack completes his interview on August 21 and reports that he refused suitable employment on July 20 without good cause. Jack is not otherwise exempt. Jack's application pends for verification of his identity. Jack fails to verify his identity by his verification due date of September 7. Since Jack is being denied for failure to verify, a sanction will not be applied.

#### ***SANCTION PERIOD FOR ONGOING CASES***

If a sanction event occurs within the six- or 12-month certification period, without good cause, the work registrant will be sanctioned. Sanctions for ongoing cases are applied following adverse action. In instances where a break in service occurs, the sanction applies from the first date that eligibility is regained and runs for the remainder of that benefit month.

**Note:** Other than during six-month reporting and renewal, the only change food units are required to report is if their total monthly gross income increases above 130 percent of the federal poverty level (FPL) for their reported food unit size. This change must be reported by the 10th of the month following the month in which the total income exceeded 130 percent of the FPL. As long as a food unit's total income is less than 130 percent of the FPL, the food unit does not need to report changes in income, assets, address, household composition, etc. These are known as "Reduced Reporting" requirements. (FoodShare Handbook 6.1.1.2)

**Example 6:** John completes his renewal interview on December 3, and FoodShare pends for verification. John doesn't provide verification timely, so his FoodShare case closes at adverse action, effective December 31. John provides his verification on January 15 and also reports that he refused

employment without good cause. Break-in-service requirements were met on January 15. This is John's first sanction event and the sanction is applied January 15 through January 31. Since John did not receive benefits from January 1 through January 31, this is a one-month sanction.

**Example 7:** Jeff applied for FoodShare in February and his case is currently open. On August 21, Jeff reports that he quit his job without good cause; he is not otherwise exempt. Verification is not necessary, so the worker determines Jeff's FoodShare eligibility and he receives his first sanction. Since FoodShare issuance already occurred for September, Jeff will be assigned a one-month sanction, beginning October 1.

When, during six-month reporting or renewal, a member reports that a sanction event took place during the certification period and FoodShare eligibility is closing for any reason, a sanction will be applied. This occurs because the member was subject to the work registration requirements at the time of the sanction event.

**Example 8:** Jill has a renewal due by December 31. Jill submits an ACCESS renewal and completes her interview on December 21. During the interview, she reports that she quit her job without good cause and is not otherwise exempt. The agency needs to verify Jill's unearned income. Jill fails to verify the income by December 31. The worker confirms that Jill's eligibility for ongoing FoodShare was closed on December 31 for failure to verify the unearned income, and a one-month sanction is applied for the month of January for her first sanction occurrence.

### **SANCTION LETTER**

A new sanction letter ([see Operations Memo attachment #2](#)) will be automatically generated and sent through CWW to an applicant or member who is being sanctioned. The letter will explain which work registration requirements the applicant or member did not comply with, how long the sanction period is, actions that can end the sanction, and how to get FoodShare benefits once the sanction ends.

Because the sanction letter is an individual-based letter (i.e., specific to an individual), it will not be sent to an authorized representative or through paperless correspondence.

### **ENDING A SANCTION**

A sanction will end if any of the following occurs:

- The applicant or member has good cause.
- The applicant or member becomes exempt from the work registration requirements.
- The sanction period ends.

### **FOODSHARE BENEFITS AFTER A SANCTION ENDS**

FoodShare benefits are not automatically re-instated at the end of a sanction period. An applicant or member who was sanctioned must re-apply or re-request FoodShare benefits. If an application for FoodShare is filed in the final month of the sanction period, the worker will use that application to deny benefits for the remaining sanction month and to issue benefits for any subsequent month if all other eligibility criteria are met.

**Case Currently Open for FoodShare:**

If the applicant or member who had a sanction would like to be added to an open food unit, he or she must re-request FoodShare. The applicant or member will be added to the food unit the first of the month following the month of the re-request.

**Closed Food Unit or One-Person Case:**

If the applicant or member who had a sanction is re-requesting FoodShare, and the ongoing food unit has been closed for more than a calendar month, the applicant or member must complete a new application. If the sanction event occurred on an ongoing FoodShare case that has been closed for less than a calendar month, the case can re-open under break-in-service rules, with benefits pro-rated from the date in which the re-request is made and all eligibility criteria are met.

If the sanction event was determined through a one-person FoodShare application, and it is the first sanction event, the original application can be used if the original application date is less than 30 days from the sanction end date. The applicant or member is still required to re-request FoodShare.

After the applicant or member re-requests FoodShare, a worker must run eligibility and confirm the case closed, and then set an expected change for the day after the sanction has ended. The expected change should indicate that the worker needs to take these actions. The worker must end date the Loss of Employment page, then update the FoodShare request to the day after the sanction end date and run eligibility to issue the pro-rated FoodShare benefits starting with the first day after the sanction.

For one-person FoodShare applications in which the applicant or member has incurred more than one sanction event, the applicant or member is required to re-apply during or after the final month of the sanction period.

***SANCTIONS AND FAIR HEARINGS***

If the food unit requests a fair hearing to contest a sanction, and the food unit members request to continue receiving benefits during the hearing process, benefits should continue until after the fair hearing decision. If the sanction is upheld, the sanction period will begin the first of the month following the month of decision, allowing for an adverse action notice. In order for FoodShare benefits to continue, the worker should enter good cause as “other” and document in case comments until a hearing decision is made.

If the decision is made to support the sanction event, a second Loss of Employment page will need to be scheduled.

**CARES**

Work registrant status will be determined systematically at FoodShare application or renewal based on the date eligibility is confirmed. The status will also be determined when a Loss of Employment page is created on or after September 24, 2016.

***EXEMPTION PAGES***

Exemption pages are used by IM workers to document circumstances that may result in a FoodShare applicant or member being exempt from meeting the work registration requirements. The work registration exemptions are recorded on the Benefits Received page, School Enrollment page, Disability page, Employment page, or Self-Employment page. If an applicant or member has more than one source

of employment and/or self-employment, CWW will total the hours worked and earnings to determine if he or she is meeting the work requirements through the combination of jobs.

In order to support the work registrant exemption for one parent or other household member who is the primary caregiver for a dependent child younger than 6 years old, the worker will need to update the “Is Caring For Child” question to Yes.

The screenshot shows a web form titled "Household Relationships". At the top right, there are "Cancel" and "Reset" buttons, and a progress indicator showing "Completed 1 of 2". The form is divided into sections. The "Reference Person" section shows "Individual: CHILD PARTICIPANT OF DAU" and "Last Updated: 10/27/2016". Below this is the "PARTICIPANT 41F PP" section. It includes fields for "Angela is the:" (MTR - MOTHER), "of Child, \*Effective:" (01 / 2016), and "Verification:" (NQ - NOT QUESTIONABLE). Under "Angela also:", there are several questions with dropdown menus: "Purchases & Prepares Meals with Child" (Yes), "Is Caring for Child" (Yes, highlighted with a red box), "Has Legal Custody of Child" (No), "Is Filling Parental Role for Child" (No), "Is an Essential Person for Child" (No), and "Is LTC Tax Dependent of Child" (No).

Figure 1 Household Relationship Page with “Is Caring for Child” Field as Yes

### ***EMPLOYMENT SUMMARY PAGE***

The Employment Summary page previously displayed the names of individuals who had a loss of employment entered on the Loss of Employment page, but it did not display sanction information. The page is being updated to allow workers to be able to see sanction information, including the sanction end date, the sanction override end date, good cause, and the re-request for FoodShare. The names of all household members with current Loss of Employment pages will be displayed on the Employment Summary page.

### ***LOSS OF EMPLOYMENT PAGE***

The Loss of Employment page will only be scheduled if there is a FoodShare request on the case. The Loss of Employment page will be scheduled during the FoodShare interview when a worker does one of the following:

- Enters a “Y – Yes” or “? – Doesn’t Know or Questionable” response on the Employment Gatepost page for the question “Has anyone in your household recently refused employment, lost employment (FoodShare) or voluntarily reduced hours?” (Figure 2).
- Enters the current date or a past date as the Employment End Date on the Employment page (Figure 3). (The Loss of Employment page will not be scheduled if a future end date is entered.)

Figure 2 Employment Gatepost Page with “Y – Yes.” Triggers Loss of Employment Page

Figure 3 Employment Page with Employment End Date Field as a Past Date

### EXISTING LOSS OF EMPLOYMENT PAGES

Because sanction periods are determined by the number of sanctions an applicant or member has, during the FoodShare interview, workers are required to review any existing Loss of Employment pages for accuracy of previous sanctions. To determine if a previous sanction was accurately applied, a worker must check the length of the sanction period and if the applicant or member had good cause (see FoodShare Handbook [3.16.1.7 Good Cause](#)).

If the applicant or member was not correctly sanctioned, the worker must delete the converted Loss of Employment page using the “AE - Agency Error” delete reason so that the information entered on that page will not affect any future sanctions the applicant or member may incur. If the Loss of Employment page is deleted using any other delete reason code, the information entered on that page will be considered for ongoing eligibility.

A Loss of Employment page that was created prior to September 26, 2016, that did not include a response to “Lost Employment?” will be updated with “CV – Conversion” in the “Change Type?” field. First sanctions created prior to September 26, 2016, appear to be three months long on the Loss of Employment page. Consistent with sanction periods defined in this Operations Memo and FoodShare policy, second sanctions applied after September 26, 2016, will last 90 days (or three months).

### NEW LOSS OF EMPLOYMENT PAGES

The Loss of Employment page is being updated to allow for workers to accurately enter all types of changes that may result in a sanction. Previously, the only type of change that could be entered was an employment ending. The “Lost Employment?” field will no longer be available to update. Workers will instead record the type of change that has occurred and that may result in a sanction in the “Change Type?” field.

When a Loss of Employment page is created, the IM worker is required to enter information in the following fields:

- Begin month
- Individual
- Change type
- Change type verification
- Change event date
- Good cause

The screenshot shows a web form titled "Loss of Employment". At the top right, there are "Cancel" and "Reset" buttons, and a "Total: 1" indicator. The form is divided into several sections:

- Effective Period:** Includes fields for "Begin Month" (08 / 2016), "End Month" (MM / YYYY), and "Last Updated: 10/27/2016". There is also a "Delete Reason" dropdown.
- Additional Information:** This section contains multiple fields:
  - "Individual": ANGELA PARTICIPANT 40F PP
  - "Sequence": 6
  - "Employer Name": (empty text box)
  - "Wages Earned Per Week": \$ [ ] . [ ]
  - "Hours Worked Per Week": [ ]
  - "Change Type?": VQ - Voluntary Quit (dropdown)
  - "Change Event Date": 08 / 15 / 2016 (calendar icon)
  - "Verification": NQ - NOT QUESTIONABLE (dropdown)
  - "Good Cause?": Yes (dropdown)
  - "Good Cause Reason": PU - PHYSICALLY UNABLE (dropdown)
  - "Re-request FoodShare?": (dropdown)
  - "Request Date": MM / DD / YYYY (calendar icon)
  - "Reason for Ignoring for Sanction": (dropdown)
- Sanction Details:** Includes fields for "Sequence", "Begin Date", "Override Sequence", "End Date", "Override Begin Date", and "Override End Date".

At the bottom of the form, there is a navigation bar with "Enter New Begin Month: MM / YYYY" and a "Go" button.

Figure 4 Loss of Employment Page with Required Fields

The change type refers to what happened with the job, unemployment compliance, or W-2 compliance. If the change type is not known because the worker is processing a change report form or a change reported through ACCESS, the worker should attempt to contact the applicant or member to clarify why the job ended or hours were reduced. If the worker is unable to reach the applicant or member, the worker should enter “? – Unknown” as the change type and “Q? – Questionable Not Yet Verified?” in the verification field to send the appropriate verification checklist.

The worker should ask the applicant or member for the reason the sanction event occurred to determine if there was good cause. If the applicant or member claims good cause and it is not questionable, the worker should enter “Yes” and “NQ – Not Questionable” for verification of good cause. If good cause is questionable, the worker should enter “Q? – Questionable Not Yet Verified” in the verification field to send the verification checklist.

CWW will systematically determine the sanction sequence number, as well as the sanction period, after eligibility is run if the individual is determined to be a work registrant, does not have any verified exemptions, and there is no good cause. The sanction information, including the sequence number and sanction period, will update in the Sanction Details section of the Loss of Employment page. Once eligibility is run and confirmed, if a sanction is determined by CWW, the fields in the Additional Information section used to determine that sanction on the Loss of Employment page will be protected and cannot be updated.

If the worker determines that the sanction sequence number and/or the sanction period are incorrect, the worker can use the override fields in the Sanction Details section on the Loss of Employment page to make corrections. When entering an override for the sequence number, begin date, or end date, the worker will need to enter override information in all four override fields. Eligibility must be re-run and confirmed to apply the corrected sanction information and to send the correct sanction letter. The sanction will not be applied until the worker confirms FoodShare eligibility.

When FoodShare is confirmed for an individual who is sanctioned, CWW will generate a new sanction letter (see attachment). The letter will include the type of change that resulted in the sanction (based on the Change Type on the Loss of Employment page), the sanction period, and information on how the applicant or member can re-gain FoodShare eligibility.

**Example 9:** In Figure 5, the individual reported during the renewal interview that he or she voluntarily reduced work hours without good cause. The sanction was systematically determined to be the first sanction, so CWW created the 30-day sanction period. However, the worker had accidentally deleted the individual’s Loss of Employment page for his or her first sanction using the “AE – Agency Error” delete reason. Since this new voluntary reduction of hours should be the second sanction, the worker corrected the sequence number to “2,” as well as the sanction timeframe.

**Loss of Employment** Cancel    
Total: 2

**Effective Period**  
Begin Month: 09 / 2016 End Month: MM / YYYY Last Updated: 09/01/2016  
Delete Reason:

**Additional Information**  
Individual: CRANE TEST4 23M PP Sequence: 2  
Employer Name:  Wages Earned Per Week: \$ .  
Lost Employment?  Hours Worked Per Week:   
Change Type?: VR - Voluntary Reduced Hours  Change Event Date: 09 / 01 / 2016  
Good Cause? No  Verification: AF - AGENCY FORM   
Good Cause Reason:  Verification:   
Re-request FoodShare?  Request Date: MM / DD / YYYY  
Reason for Ignoring for Sanction:

**Sanction Details**  
Sequence: 2 Override Sequence: 1 Override Reason: AE - Agency error  
Begin Date: 10/01/2016 End Date: 12/31/2016  
Override Begin Date: 10 / 01 / 2016 Override End Date: 10 / 31 / 2016

Enter New Begin Month: MM / YYYY

Individual: CRANE TEST4 23M PI Sequence:  Updated on or before: MM / DD / YYYY

Cancel

Figure 5 Loss of Employment Page with Override Fields

If CWW does not create a sanction after running eligibility, the Loss of Employment page will be updated in the “Reason for Ignoring the Sanction” field to indicate the reason that a sanction was not created. In Figure 6 below, the household member was not sanctioned for refusing suitable employment because it took place more than 30 days from the FoodShare filing date.

**Loss of Employment** Cancel

Total: 1

---

**Effective Period**

\* Begin Month: 10 / 2015      End Month: MM / YYYY      Last Updated: 08/23/2016  
Delete Reason:

---

**Additional Information**

\* Individual: EXAMPLE 35F PP      Sequence: 1  
Employer Name:      Wages Earned Per Week: \$  
Lost Employment?      Hours Worked Per Week:  
\* Change Type? RE - Refused Suitable Employment      \* Change Event Date: 08/01/2015  
\* Good Cause? No      \* Verification: AF - AGENCY FORM  
Good Cause Reason:       Verification:   
Re-request FoodShare?      Request Date:  
**Reason for Ignoring for Sanction: BTF - BEYOND 30 DAYS FROM FILING DATE**

---

**Sanction Details**

Sequence:      Override Sequence:      Override Reason:   
Begin Date:      End Date:  
Override Begin Date:      Override End Date:

Enter New Begin Month: MM / YYYY Go

---

Individual: BERTHA EXAMPLE 35I      Sequence:      Updated on or before: MM / DD / YYYY Go

**Figure 6** Loss of Employment Page with “Reason for Ignoring for Sanction” Field Completed

For an individual to regain FoodShare eligibility, the “Re-request FoodShare?” and “Request Date” fields on the Loss of Employment page must be updated. If these fields are not updated, the individual will continue to fail the non-financial eligibility criteria for FoodShare. If eligibility is being run for a month in which the individual is sanctioned, the individual will fail the non-financial criteria with the reason code associated with the type of change that resulted in the sanction. If eligibility is being run for any month after the individual’s sanction has ended, the individual will fail the non-financial criteria with the reason code 739 “Lack of Re-request” as shown in Figure 7 below.

Non-Financial Summary			Cancel <input type="checkbox"/>	Reset
<b>Assistance Group Overview</b>				
Assistance Group:	FS - FOODSHARE	Sequence:	1	
Benefit Begin Date:	11/01/2016	Benefit End Date:		
Determination Date:	10/05/2016			
<b>Results</b>				
Assistance Group Status:	O - OPEN	Eligibility Status:	PASS	
<b>Individual Details</b>				
Individual	Result	Non-Financial Eligibility Reasons		
EXAMPLE 36FPP	PASS			
EXAMPLE 43F	FAIL	739 - Lack of Re-request		

Figure 7 Non-Financial Summary Page with “Lack of Re-request” Reason Code Shown

**FOODSHARE WORK REGISTRANT/ABAWD EXEMPTION PAGE**

The FoodShare ABAWD Exemption page is being updated to gather relevant information on work registrant exemptions and is being renamed the FS Work Registrant/ABAWD Exemption page. The page will help workers discuss FoodShare work registrant exemptions and ABAWD exemptions that may apply to an applicant or member.

The following sections of the FS Work Registrant/ABAWD Exemption page must be completed for each individual in the household who is age 16 through 59:

- The Additional FS Work Registrant and ABAWD Information section. This section shows exemptions not captured elsewhere in CWW that are applicable to both the work registrant status and ABAWD status.
- The Additional FS ABAWD Information section. This section shows exemptions not captured elsewhere in CWW that are applicable to ABAWD status only.

The following sections will be populated based on responses to previous pages in CWW that were completed by the worker during the driver flow:

- The most recent Work Registrant and FS ABAWD Exemption section. This section shows exemptions that are pulled from other pages in CWW that are applicable to both the work registrant status and ABAWD status.
- The most recent FS ABAWD Exemption section. This section shows exemptions that are pulled from other pages in CWW that are applicable to ABAWD status only.

FS Work Registrant / ABAWD Exemption		Cancel	Reset
<b>Effective Period</b>			
* Begin Month:	07 / 2016	End Month:	MM / YYYY
Delete Reason:	<input type="text"/>	Last Updated:	07/26/2016
<b>Additional FS Work Registrant and ABAWD Information</b>			
* Individual:	PARTICIPANT 40F PP		
* Is this Individual in compliance with a W-2 work program?	No		
* Is this individual the caretaker of a child under age 6 out of home?	No	Verification:	<input type="text"/>
* Is this individual the caretaker of an incapacitated individual outside of the home?	No	Verification:	<input type="text"/>
<b>Additional FS ABAWD Information</b>			
* Is this individual participating in an allowable work program?	No	Verification:	<input type="text"/>
If Yes, which work program is the individual participating in?	<input type="text"/>		
On average, how many hours per month does this individual participate in the selected work program?	<input type="text"/>		
<b>Most Recent Work Registrant and FS ABAWD Exemption</b>			
Is this individual meeting Work Registrant requirement by working (employment and self-employment)?	No		
Is this individual currently physically or mentally incapable of working?	No	Verification:	<input type="text"/>
Is a household member needed to care for this person?	No		
Primary Caretaker:		Verification:	<input type="text"/>
Has this individual applied for or is this individual receiving unemployment compensation?	No	Verification:	<input type="text"/>
Is this individual an inpatient / outpatient participating in a drug or alcohol treatment program?	No	Verification:	<input type="text"/>
<b>Most Recent FS ABAWD Exemption</b>			
Is this individual meeting the FS ABAWD work requirement by working (employment and self-employment)?	No		
Individual Pregnant?	No	Verification:	<input type="text"/>

Figure 8 Updated FS Work Registrant/ABAWD Exemption Page

**FOODSHARE WORK REGISTRANT/ABAWD DETERMINATION DETAILS PAGE**

The FoodShare ABAWD Determination Details page is being updated to include FoodShare work registrant status. The page is being renamed the FS Work Registrant/ABAWD Determination Details page. This page will display the systematic determination of both FoodShare work registrant and ABAWD statuses, along with any verified exemptions.

**FS Work Registrant / ABAWD Determination Details** Cancel

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**SCOTT TONY 36M**

Benefit Begin Month	Benefit End Month	Date Created	Work Registrant?	Work Registrant Exemption Reason(s)	FS Eligible	FS ABAWD Participation Status	Exemption Reason(s)
11/01/2016		09/26/2016	No	W2	Eligible	Exempt ABAWD	DR
10/01/2016	10/31/2016	09/26/2016	No	W2	Eligible	Exempt ABAWD	DR
09/26/2016	09/30/2016	09/26/2016	No	W2	Eligible	Exempt ABAWD	DR

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**SAMANTHA SCOTT 34F**

Benefit Begin Month	Benefit End Month	Date Created	Work Registrant?	Work Registrant Exemption Reason(s)	FS Eligible	FS ABAWD Participation Status	Exemption Reason(s)
11/01/2016		09/26/2016	No	W2	Eligible	Exempt ABAWD	CC,DR
10/01/2016	10/31/2016	09/26/2016	No	W2	Eligible	Exempt ABAWD	CC,DR
09/26/2016	09/30/2016	09/26/2016	No	W2	Eligible	Exempt ABAWD	CC,DR

Updated on or before  
 /  /

Figure 9 FS Work Registrant/ABAWD Determination Details Page

**VERIFICATION CHECKLIST PAGE AND VERIFICATION CHECKLIST UPDATES**

The Verification Checklist page is being updated to display the verification needed for information recorded on the Loss of Employment page. A “Q – Questionable” entered in the “Change Type” field on the Loss of Employment page will create a Verification Checklist page (see Figure 10).

**Verification Checklist** Cancel

Application Entry Section	Individual	Type	Pending Information / Verification	Assistance Group / Sequence
Loss of Employment		Loss of Employment	- Change Type	FS 01

Individual:  Assistance Group:  Updated on or before:  /  /

Cancel

Figure 10 Verification Checklist Page Created After “Q – Questionable” is Selected on Loss of Employment Page

“Change Type Unknown” has been added as a change type on the verification checklist. The Proof Needed section of the verification checklist will display the same information for this change type as is used for change types “Refused suitable employment,” “Voluntary quit,” and “Voluntarily reduced hours.” In the Proof Needed section, the information for “What?” will display “Change in job,” and the information for “Examples\*” will display “Statement that describes why you quit a job of 30 or more hours per week, changed your work hours to less than 30 hours per week, or turned down a suitable job.”

Additional options have also been added to the Proof Needed section for failure to comply with the unemployment program or W-2 program:

- For failure to comply with the unemployment program, the information for “Examples\*” will display “Copy of your unemployment benefits letter or a statement from your state’s unemployment agency that explains why your benefits ended.”
- For failure to comply with the W-2 program, the information for “Examples\*” will display “Copy of your W-2 benefits letter or a statement from your W-2 agency that explains why your benefits ended.”

## **CONTACTS**

BEPS CARES Information and Problem Resolution Center

DHS/DHCAA/BEPS/KV