

## **Second Party Review Targeted ABAWD/FSET Review**

Effective 4/1/2015, policy and process changes went into effect for the Able-Bodied Adults Without Dependents (ABAWD) population, for the balance of the state outside of the pilot region (Kenosha, Racine, and Walworth counties). These policies bring us into compliance with federal regulations outlined in 7 CFR §273.7, which require ABAWD individuals to meet certain standards to receive more than three months of time-limited benefits (TLB).

To ensure that the rollout of policy and process changes are implemented properly, it was determined that there should be a number of second party reviews specifically targeting the ABAWD population. Previous reviews have helped to identify needed policy, process, system, and training enhancements. This review is the third such review completed since 4/1/2015. In addition to reviewing individuals that are just now having the policy applied, this review also targets a sample of individuals that were losing their FoodShare benefits for August 2015, as of adverse action in July 2015. This is also the first review to include a targeted review of the FSET agency portion of case work.

The elements that were reviewed for each PIN and household were directed at application of policy, eligibility determination, case accuracy (mainly as relating to potential exemptions and several pages in CARES Worker Web), and correspondence. The following questions were asked, divided into their respective reviews, based on the income maintenance and the FSET agency processing portions:

### **Income Maintenance questions**

1. Was the application of ABAWD policy correct?
2. Do case comments clearly state that during the interview, all of the exemption reasons were discussed with the individual?
3. If a potential ABAWD exemption was reported, was a verification checklist sent?
4. If timely verification was received for the reported exemption, was the exempt status applied to the beginning of the correct month?
5. Does the FS ABAWD Exemption page in CWW reflect the case and reported information?
6. Is the FS Clock page accurate?
7. Was the referral to FSET sent at the time of confirmation, or was it picked up in a later batch process?
8. Was the eligibility determination correct?
9. If a denial occurred, was the denial valid (including the denial notice language and the denial reason)?

### **FSET questions**

1. Did the FSET agency attempt to schedule the initial appointment?
2. Was a second appointment scheduled, if the first was missed?
3. Was the initial appointment scheduled within 5 business days of the FS effective date?
4. Was the date of the appointment within 12 calendar days of the FS effective date?
5. Was the appointment letter manually sent if scheduled sooner than 12 days from the scheduling date?
6. Was an FSET appointment scheduled, regardless of the client response regarding their willingness to participate, or if a potential exemption was reported?

7. If a potential exemption was reported, was that information then relayed to the IM agency via telephone or email?
8. If an individual was participating, is there a signed Employment Plan in the ECF?
9. If good cause was entered, was the reason for doing so reasonable and documented?
10. If an individual was participating, was the participation status of the individual properly tracked?
11. Do the PIN comments adequately explain actions taken by the FSET agency?

Three groups of individuals were reviewed<sup>1</sup>:

- 110 non-exempt ABAWDs that had their FoodShare eligibility confirmed between the dates of 7/1/2015-7/21/2015. (IM review)
- 110 non-exempt ABAWDs that had their FoodShare eligibility for 8/1/2015 discontinued due to the expenditure of three months of TLB, as of adverse action 7/2015. (IM review)
- 120 non-exempt ABAWDs that were referred to FSET between the dates of 4/1/2015-4/10/2015. (FSET review)

The following issues presented themselves as part of the review findings:

#### **Income Maintenance Case Review**

- 34 of the 220 cases reviewed had one or more issues relating to the case processing or eligibility determination.
- 42 cases had clear documentation showing that all possible exemptions or non-ABAWD status determining factors were explained. The criteria applied for this determination was based on clear case comment language explaining that exemptions were explained (this is significantly higher than past reviews).
- 8 cases should not have had the ABAWD policy applied. 6 of these were due to incorrect break in service processing.
- Potential exemptions were reported 9 times, with no verification checklist being sent for the potential exemption.
- Exemptions were verified for 12 individuals. Of those 12, 5 did not have their clock status properly updated to exempt them for all the months in which they would be exempt.
- 11 instances of incorrect FS ABAWD Exemption pages were found. Of these, 8 were incorrect due to no FS ABAWD Exemption page existing for one or more individuals on a case.
- 17 FS Clock pages were incorrect. These varied in reason and are linked to the previous bullet points (incorrect application of exemptions, break in service processing). Some of

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<sup>1</sup> For the income maintenance reviews, if there were other ABAWD individuals sharing a case with the targeted PIN, those individuals were also reviewed using the same criteria.

these were also due to the proper exemption trigger field being updated. An example of this would be an individual receiving SSI/SSDI, but not creating a Disability page.

- 3 cases had the FSET referral sent at a later date as part of a CARES batch, most likely due to the worker exiting the “Refer to FSET” page via the Navigation Menu, rather using the next (or enter key) to advance to the next page in the driver flow.
- 11 cases were found to have incorrect eligibility determinations. These mostly sync up with the previous bullet points and relate to denials or incorrect application of ABAWD policy.
- 7 cases were found to have been denied for benefits incorrectly. These mostly tie into issues addressed in the previous bullet points. In a few instances, these individuals incorrectly closed because they were not correctly determined as a non-ABAWD or exempt-ABAWD.
- Of the 220 cases reviewed, 184 were correct and had no other issue (other than in some instances having no case comments clearly explaining that exemptions were discussed). This means that approximately 83.64% of the cases reviewed were correct.

#### **FSET PIN Processing Review**

- 31 of the 120 PINs reviewed for FSET processing had one or more issues.
- 4 instances were found where when the FSET agency did not reach the individual when attempting to schedule their initial FSET intake appointment, they were unsuccessful and did not schedule the appointment for three months (all were instances of partial first month FoodShare eligibility, contacted around 4/10/2015 and scheduled for their first appointment in 7/2015, too late to fully participate).
- 6 times an individual was not scheduled for the second required intake appointment, after the first was missed. 3 of these relate to the previous bullet point, since it was too late by that time to schedule a second appointment (FoodShare ineligible).
- There were 7 individuals that were not scheduled for an intake appointment within 5 days of the FoodShare referral effective date.
- 15 people did not have their FSET intake appointment scheduled within 12 calendar days of the FoodShare referral effective date. 5 of these were scheduled to within 5 days of the 12 day policy requirement.
- Potential exemptions were reported to an FSET worker 22 times. Of those, 10 were not then reported by the FSET agency to the IM agency through email or telephone contact.
- Of the 28 individuals that made it to the point where an Employment Plan would be completed, 4 did not have a signed Employment Plan in the ECF.
- Good cause hours were entered on 7 cases. 1 has no information or documentation regarding the entry of good cause hours.

- Participation hours were entered for 24 individuals. Of those 24, 2 didn't have properly tracked participation (1 of these was a result of the above bullet point).
- Only 2 people had inadequate PIN comments. None of the reviewed individuals had no PIN comments. 1 of the 2 relates to the above mentioned good cause hour issue. The other did not have follow-up comments after a missed appointment.
- Of the 120 reviewed individuals, 86 had correct FSET agency processing. This is a 71.67% accuracy rate.<sup>2</sup>

### **Final notes**

Individual information for IM agency errors, including any recommended corrective action, was sent to the individual agencies via our Quality Control agency contacts (the same route we take when sending our regular review findings). All FSET agency issues were forward to Kara Koonce and Jayne Wanless, since Second Party Review does not have any official agency contacts within the FSET agencies. Second Party Review plans to implement an FSET review process as part of the monthly sample of cases we review. The implementation date of this process is currently unknown and is still in the initial parts of planning.

At least one more targeted review is planned for IM/FSET. The date that this review will occur is still to be determined. It is likely that any such review will target more recent agency processing for both IM and FSET. There was a 5.4% improvement in IM agency processing between the first targeted review and this most recent targeted review (first review contained 78.24% correct cases).

If there are any questions or concerns, please don't hesitate to reach out to me.  
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<sup>2</sup> The reason for the difference between the first and last bullet point (three individuals) is that those three had case issues that needed to be addressed by the IM agency.