

# INCOME MAINTENANCE ADVISORY COMMITTEE (IMAC)

Thursday, July 20, 2023

1:00 – 3:30 p.m.

Zoom: <https://dhs.wi.zoomgov.com/j/1619409056>

## Minutes

### Invitees

Attendees (X = Attended)			
X	Jonelle Brom – DHS BEOT	X	Beth Stiner – DHS BEOT
X	Alicia Grulke – DHS BEOT	X	Elizabeth Olsen – DHS BEOT
X	Michelle Brownlow – DHS BEOT	X	Pang Xiong – DHS BEOT
X	Lisa Hanson – DHS BEOT	X	Ashley Schabel – DHS BEOT
X	Abby Abernathy – DHS BEOT	X	Jori Mundy – DHS BEEP
X	Jody Noble – DHS BEOT	X	Candice Canales – DHS BEEP
X	LaTanya Baldwin – DHS BEOT	X	Autumn Arnold – DHS BEEP
X	Molly Thomas – DHS BEOT	X	Stephanie Dorfman – DHS BEEP
X	Julie Taylor – DHS BEEP	X	Steven Boisvenue – DHS BEEP
X	Laurie Teubert – DHS BEEP	X	Kristine Bovee – DHS BEOT
X	Melissa Benner – DHS BEEP	X	Becky Luebke – DHS OIG
X	Nick Haught – DHS BEEP	X	Nicole Huffman – DHS BEEP
X	Mary Augustine – DHS BEEP	X	Shannon Drake-Buhr – DHS BEEP
X	Craig Hayes – DHS BEEP		<i>MilES – Tonya Evans</i>
X	Bay Lake – Chelsey Groessl		<i>MilES – Mike Poma</i>
	<i>Bay Lake – Becky Hetfield-Salentine</i>	X	Moraine Lakes – Mia Anderson-Inman
X	Capital – Shawn Tessmann	X	Moraine Lakes – Robert Klingforth
	<i>Capital – Tony Sis</i>	X	Northern – Steve Budnik
X	Central – Nicole Rolain	X	Northern – Jeanine Spuhler
	<i>Central – Kris Weden</i>		<i>Southern – Kate Chambers</i>
X	East Central – Ann Kriegel	X	Southern – Mark Nelson
X	East Central – John Rathman	X	Western – Lorie Graff
	<i>East Central – Annett Mooney</i>		<i>Western – Tricia Wavra</i>
X	Great Rivers – Kathy Welke	X	WKR – Dustin Feeney

X	Great Rivers – Ronda Brown		<i>WKRP – Katie Kasprzak</i>
	<b>Guests:</b>		
X	April Ferstl - DCF	X	Candice Canales - OIG
X	Kent Ellis - DCF	X	Tabbie Mellenberger - OIG
X	Carla Sumner – DHS DCF	X	Tanya Allen – OIG
X	Gage Winkelmann - DCF	X	Nicole Koch – DHS OIG
X	Cheryl Kawlewski - BRITS	X	Julie Anstett – DHS OIG
X	Jatinder Singh – DHS	X	Anthony Gehring – DHS OIG
X	Michelle Peterson - FCP	X	Tami Berg – DHS OIG
X	Shawn Thomas – DHS BSM	X	Charles Morgan – WI Legislature
X	Kesha Cole – Ozaukee County	X	Kara Ponti – Dane County
X	Darsell Johns – Ozaukee County	X	Stacey Stewart – Washington County
X	Jessica Schultze - Jefferson County	X	Briana Turk – Richland County
X	Adam Chorlton – Dane County	X	Roxann Binkowski – Waushara County
X	Rose Strege – Mohican Tribe	X	Amy Beranek - Dodge County
X	Renae Zagel – Washington County	X	Shelby Jensen – Green Lake
X	Deb Bohlman – Fond du Lac	X	Amber Taylor – Adams County
X	Krystal Ellis – Racine County	X	Deb Williquette – Manitowoc County
X	Nicole Boyer – Kenosha County	X	Kathy Busler – Jefferson County
X	Carol Wautlet – Door County	X	Maria Delgado – Rock County
X	Wendy Sanchez	X	Ron Redell

## AGENDA

### Welcome (Jonelle Brom & John Rathman)

- Report attendance by replying to an email from [DHSBEOTAdmin@dhs.wisconsin.gov](mailto:DHSBEOTAdmin@dhs.wisconsin.gov).

### Public Comments

- None

### Approval of June 15, 2023, Meeting Minutes (Jonelle Brom)

- Motion to approve the minutes made by Ann Kriegel, Steve Budnik, and approved by consensus.

### Policy Updates/COVID-19 Policy updates (Department of Health Services)

#### Healthcare Updates

- Unwinding Updates
  - July and August renewals are underway. The Department started mailing packets during the week of July 10 for August renewals, with letters that instruct members to submit their renewals by August 17th to avoid any gaps in coverage.
- CTS benefit increases
  - The state budget was signed in July 2023, and one of the key changes for the healthcare programs is a 10% increase in the Caretaker Supplement benefit amount. It increases the benefit for the first child from \$250 to \$275 and for each additional child from \$150 to \$165.
  - The Department is still working out exactly when and how we will enact the changes, but we are actively working on implementing the law change and expect to be able to share more detailed information relatively soon.
  - The Department will be working on updating our website, forms and publications to reflect the new amounts.
- Personal Needs Allowance increase
  - The final state budget bill includes an increase in the maximum Personal Needs Allowance from \$45 to \$55 for members enrolled in Institutional Medicaid. This will be effective July 1, 2024. The Department will work toward that effective date with changes in policy and CARES.

#### FoodShare Updates

- FoodShare Application
  - The Department is in the process of updating the FoodShare paper application for benefits form called the *FoodShare Wisconsin Registration Packet*.
  - The Department is making several changes to the application, most notably combining the 2 current versions of the form which are F-16019A and F-16019B.
  - The 'A' form is a shortened application, also referred to as a "page one" application, that asks for the minimum needed information to set a filing date (name, address, signature) and information needed to screen for priority service, which is optional.
  - The 'B' form is the longer application that asks about who lives in the household, income, expenses, etc. in addition to the information collected on the 'A' form.

- The Department anticipates the updated application will be available in August and are in the process of getting the updated form translated into the same languages the current application is available in.
- The A and B versions can still be used as agencies and partners transition to the new version and use up existing stock.
- Elderly Blind Disabled Medical Expense Guide
  - One of the ARPA-funded projects centers around creating member-facing materials to promote and better explain the medical expense deduction of which Elderly, Blind, and Disabled (EBD) FoodShare members can take advantage. Taking advantage of this deduction has the possibility of lowering the amount of countable income that an EBD member or household has, in turn increasing their FoodShare monthly benefit allotment.
  - As part of this project, the Department created posters and fliers to be hung in FoodShare outreach organizations, senior centers, Aging and Disability Resource Center(ADRC), and other locations where EBD FoodShare members may see them. The Department created comprehensive member-facing guides that were mailed to all households that had at least one EBD member. These guides were mailed in phases with most of them being sent in January and February 2023.
  - The Department examined the impact that these materials and efforts had by the following:
    - Reviewed data for the months leading up to and during the mailing of the member guides (and distribution of the posters and fliers) as well as the same data points for the months right after the months in which EBD members would most likely be acting based on the information shared within the materials created.
    - Reviewed the amount of FoodShare cases with at least one EBD member were taking advantage of the medical expense deduction. The Department also reviewed how much of the FoodShare benefits could be attributed to that deduction.
  - Results:
    - The number of FoodShare households with at least one EBD member that are taking advantage of medical expense deductions has not significantly changed from before the sharing of these materials to after.
    - The Department has seen significant increases in the amount of dollars that these households are receiving that can be attributed to medical expense deductions.
      - In September 2022, EBD households who had medical expense deductions were receiving on average \$31.87/month in FoodShare benefits that were attributed to that deduction. In March 2023, \$53.72/month in benefits could be attributed to the monthly allotment of EBD households with a medical expense deduction. This amount was even slightly higher in April 2023, being \$54.11.
      - This equates to a Total Monthly Increase in FoodShare Issuance Attributable to Medical Expense Deductions or \$822,303 per month, and a Total Annual Increase in FoodShare Issuance Attributable to Medical Expense Deductions of \$9,867,636.
  - These numbers show that while many members had reported some of the allowable medical expenses, having a comprehensive and easy-to-understand guide on the many types of medical expenses allowed helped members identify expenses that they had not previously reported. The efforts made to comprehensively explain how the deduction works and list out many of the eligible medical expenses within the member packet were successful.

- The Department strategically chose to send out these packets, posters, and fliers so that they'd be received or seen near the time when Emergency Allotments were coming to an end to remind EBD households of a way to potentially increase the base monthly FoodShare allotment right at the time that these extra allotments would be going away. The Department proactively notified Income Maintenance Agencies of these efforts and shared the worker tools available.
- The Department would like to thank the Income Maintenance agencies for the contributions to the success of this campaign. The efforts made to assist EBD members to clearly understand and take advantage of medical expense deductions has made a sizeable difference in members FoodShare allotments.

#### Fiscal Responsibility Act

- The Fiscal Responsibility Act of 2023 (FRA), less formally referred to as the debt ceiling bill, was signed by President Biden on June 3, 2023.
- The Act included several provisions related to the FoodShare work requirement, two of which require program policy changes.
  1. Increased age range for who is subject to the ABAWD work requirement
    - Currently, Able Bodied Adults without Children (ABAWD) Include those aged 18-49.
    - As a result of the changes, the age range will be increased over 3 Fiscal Federal Years (FFY).
      - Fiscal Year 2023: 18 – 50 years of age (Beginning September, 2023)
      - Fiscal Year 2024: 18 – 52 years of age
      - Fiscal Year 2025: 18 – 54 years of age
    - The Department is in the process of making policy, system, and communication updates to accommodate the new age range.
  2. Addition of 3 new populations explicitly exempt from the FoodShare work requirement.
    - There are a variety of existing exemptions from the FoodShare work requirement and the Act lays out 3 more required exemptions. These are allowed through 2030.
      - Individuals who are unhoused
        - The new definition of homelessness for an ABAWD exemption now aligns with the general definition of homeless for FoodShare. Therefore, FoodShare members that are homeless will be exempt from the FoodShare work requirement and will no longer need to meet the additional criteria of being chronically homeless.
      - Veterans
        - Guidance from Food and Nutrition Services (FNS) defines a veteran as a person who served in the United States Armed Forces (including the Army, Marine Corps, Navy, Air Force, Space Force, Coast Guard, National Guard, and Armed Forces Reserve). In this case, the veteran has been discharged or released under any conditions.
- **Individuals 24 years of age or younger who were in foster care under the responsibility of the state through the maximum age permitted by the state.**

- Former Foster Care Youth are people who were in state supervised out of home placement when they turned 18 and are younger than 25.
- In addition to these 3 new exemptions, the Department is changing the verification requirements for ABAWD exemptions policy. Current policy states that any ABAWD exemptions must be verified. The new policy will be that ABAWD exemptions must only be verified if questionable, unless verification of the exemption is required for another component of eligibility (for example, unemployment benefits. Income must be verified for FoodShare eligibility; therefore, the exemption cannot be applied without verification).
- The Department is implementing the new exemptions by a multi-phased approach on a tight timeline.
- An operations memo will be published in August 2023 will include the new age range, the 3 new allowable exemptions, and a change to the verification requirements for ABAWD exemptions.
- Key notices will be updated to include the new age range and exemptions on 8/12.
- Manual process is being developed to apply the new exemptions until CWW can be updated and will be providing more information to IM agencies next week.

#### ABAWD Time Limit Reinstatement

- Due to the implemented flexibilities, members in WI have not lost eligibility due to not meeting the ABAWD work requirement since March 2020.
- The federal suspension ended June 30, 2023.
- Wisconsin developed a 9-month phase in plan to reduce the number of ABAWDs each month that may be subject to the FoodShare work requirement
  - All ABAWDs at risk of a TLB in the months of July, August, and September 2023 will receive an exemption based on allowable flexibilities.
  - Starting October 1, 2023, all **new** Foodshare applicants will be subject to the time limit if applicable.
  - The time limit will apply to applicable **ongoing** members beginning the first month following their next renewal or six-month report form, starting with renewals and SMRFs due in September 2023.
    - Example 1a: Sarah A applies for FoodShare in September 2023. Sarah A is an ABAWD; however, because of the three-month delay in rolling out the work requirement, Sarah will receive an exemption in September 2023 and every month going forward until her next renewal or SMRF.
    - Example 1b: Sarah B applies for FoodShare in November 2023. Sarah B is an ABAWD and will be subject to the ABAWD time limit at the time of application. (This will be true if Sarah B applies any time after October 1, 2023.)
    - Example 2a: Ryan A is an ongoing FoodShare member with a SMRF due in August 2023 and a renewal date of February 2024. Ryan A is an ABAWD. Ryan A will receive discretionary exemptions July 2023 to January 2024 and becomes subject to the work requirement in February 2024. This is because Ryan's SMRF was in August. Had Ryan's SMRF been due in November 2023, and he was still an ABAWD, he would be subject to the time limit upon completion of his SMRF.
- The key messages that we have been emphasizing are:
  - The federal suspension is ending June 30, 2023.

- Not all FoodShare members who will need to meet a work requirement will be required to do so right away. Members will be notified via letter if and when they need to meet a work requirement.
- The Department continues to inform partners about the consolidated notice of work requirements, which is the notice members will receive when they are subject to a work requirement.
- The eligibility system will be systematically updated to correctly apply the exemptions. Income Maintenance agencies do not need to take any action.

#### FRA and Time Limit Reinstatement

- The new FRA provisions do not change our ABAWD Time Limit Reinstatement (TLR) plan, however, the Department continues to evaluate as new provisions are being implemented.

#### American Rescue Plan Act Project Updates

- The attachment provides high level information regarding the Fiscal Federal Year (FFY) 2023 American Rescue Plan Act (ARPA) projects that impact eligibility and enrollment.
- The American Rescue Plan Act of 2021 provides grant funds to assist State agencies in carrying out legislative provisions and improving administration of the SNAP program as part of responding to the COVID public health emergency.
- FNS awarded Wisconsin approximately \$10,616,552 for FFY23. This includes some funding that was unspent from FFY21, which FNS reallocated back to states.
- ARPA funded projects must meet certain requirements and be approved by FNS.
- Some ARPA projects included in Wisconsin's ARPA portfolio are not funded exclusively through the ARPA grant and instead require additional funding sources for purposes of planning and implementation. This may be because the project impacts multiple programs and must be cost allocated, the project will not be completed by the end of this fiscal year, or because there were not enough ARPA funds available to fully fund all projects prioritized by Division of Medicaid Services (DMS).
- All costs reimbursed by this grant must be incurred by no later than September 30, 2023.
- Wisconsin was also awarded an ARPA grant for FFY21 and FFY22. It is expected that the current fiscal year (FFY23) will be the last year that federal ARPA funds will be made available to states.
- Throughout the course of the Federal Fiscal year, Wisconsin has closely tracked its spending and projected spending for projects approved under our ARPA plan and continues to adjust its ARPA project portfolio accordingly.
  - The most recent submission was approved by FNS in May 2023, and another revision is expected to be submitted before the end of the Fiscal Year, to ensure all awarded dollars are accounted for.

- High level information regarding each project is included below. Each project either has been or will be brought to you for further detail, consistent with our traditional process to brief you on upcoming projects.

#### **Subcommittee Updates (Income Maintenance Agency Subcommittee Co-Chairs)**

- Income Maintenance Operational Analysis (IMOA) subcommittee met on July 14, 2023. John Rathman shared key discussion points (see attachment). Next meeting is August 4, 2023.
- Call Center Operational/Technical subcommittee met on June 12, 2023. See attachment for key discussion points. Next meeting is July 31, 2023.

#### **Income Maintenance (IM) Funding and Contract Updates (Alicia Grulke & John Rathman)**

- WHCSA has identified the 2024 Income Maintenance Contract Negotiation Team. The agencies have delegated contract negotiations to WHCSA and identified those that want to participate for tracking purposes.
- The first 2024 Income Maintenance Contract Negotiation meeting is scheduled for July 27, 2023.

#### **Consortia Feedback (John Rathman)**

- Consortia discussed ARPA funding and consortia felt funds would be spent by September 30, 2023. Reasons for delay in reporting included delay in getting contracts approved, overtime expenses just ramping up with unwinding, some agencies will be issuing incentive/retention bonuses in the next few months, and one or two consortia incorrectly reported some expenses which is being corrected.
- Consortia requested clarification that each Consortium will receive both an anticipated funding increase for IM base funding as well as Fraud funding for both 2023 and for 2024 contracts.
- Consortia would like the overpayment workgroup to continue. Topics suggestions are improving SWICA processes, implementing compromising claims policy and procedures, SMRF Bots, and the fair hearing process.
- Several ADRC/IM workgroup topics are surfacing. Consortia believe that it was agreed that the EBD/LTC subcommittee would address these items and decide if a special ad hoc workgroup should be created or if those topics can just be addressed on an agenda for the EBD/LTC workgroup.
- The consortia would like the Centralized Document Processing Unit (CDPU) to give a presentation at the August Income Maintenance Advisory Committee (IMAC) meeting to provide updates on workload, CDPU current statistics, and current hours of operation/staffing.
- Consortia thought that the National Change of Address report would be issued consistently right around adverse action each month. Consortia would find it helpful for workload purposes for the report to be issued at a consistent time each month.

#### **Administrative Memos (Alicia Grulke & John Rathman)**

- None

#### **Regional Enrollment Network (Lorie Graff)**

- Registration for the 2023 Enrollment Conference is open. The main conference is September 12-14, 18-20, 2023 9am-12pm.



## Announcements

- Supplemental Nutrition Assistance Program (SNAP) Payment Error Rates
  - The SNAP or FoodShare payment error rates (PER) for federal fiscal year (FFY) 2022 were announced June 30.
  - Last reported payment error rates were in 2019: National: 7.36% and Wisconsin: 5.40%
    - Wisconsin was slightly under the 6% threshold and avoided first year liability.
  - Due to the many state and federal flexibilities during the Public Health Emergency, no payment error rates were established for Federal Fiscal Year (FFY) 2020 and 2021.
  - SNAP Payment Error Rate for FFY22: National: 11.54% and Wisconsin: 4.39%.
  - Thank you for the hard work to ensure Wisconsin's SNAP program members are receiving the correct benefits and timely.
- For upcoming meetings in 2023, send agenda items to the WHCSA Tri Chairs or Bureau of Eligibility Operations and Training operations associate at [DHSBEOTAdmin@dhs.wisconsin.gov](mailto:DHSBEOTAdmin@dhs.wisconsin.gov).
- For attendance, reply to [DHSBEOTAdmin@dhs.wisconsin.gov](mailto:DHSBEOTAdmin@dhs.wisconsin.gov).