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**State of Wisconsin
Governor Scott Walker**

**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: Deborah Waite, Deputy Bureau Director
Bureau of Enrollment Policy & Systems
Division of Health Care Access and Accountability**

BEPS/DFS OPERATIONS MEMO					
No: 12-15					
DATE: 04/04/2012					
FS	<input checked="" type="checkbox"/>	MA	<input type="checkbox"/>	BC+	<input type="checkbox"/>
SC	<input type="checkbox"/>	CTS	<input type="checkbox"/>	FSET	<input type="checkbox"/>
BC+ Basic	<input type="checkbox"/>	BC+ CORE	<input type="checkbox"/>		
CC	<input type="checkbox"/>	W-2	<input type="checkbox"/>	EA	<input type="checkbox"/>
CF	<input type="checkbox"/>	JAL	<input type="checkbox"/>	JC	<input type="checkbox"/>
RAP	<input type="checkbox"/>	WIA	<input type="checkbox"/>	Other	<input type="checkbox"/> *
EP					

SUBJECT: FoodShare Negative Error Prevention

CROSS REFERENCE: Process Help [3.4.6](#), [3.9](#), [3.13](#); FoodShare Handbook [1.2](#), [2.1](#), [2.2](#); Ops Memos [10-05](#), [11-64](#)

EFFECTIVE DATE: Immediately

PURPOSE:

The purpose of this memo is to review FoodShare (FS) policies and procedures for processing Six Month Report Forms (SMRF) and verification at application, renewal and change reporting in order to reduce negative errors made in the FS Program.

BACKGROUND:

A negative error is found when an agency denies or terminates FS benefits improperly. In these cases, households did not receive the FS benefits they may have been entitled to receive. Many of the errors have been identified by State Quality Control in cases where SMRF's were submitted through ACCESS and were not linked properly to the case or were not processed properly. In addition, some of the negative errors were caused by untimely action taken on cases pending verification. These cases were considered closed for lack of verification (NV'd) prior to or after the verification due date.

The goal, statewide, is to improve the negative error rate by ensuring all benefit denials and terminations are accurate and processed timely. Households must receive proper notification of required verification and be provided the allowable timeframe for submitting verification. Eligible households should receive their benefits timely and accurately. This Ops Memo will provide some reminders, as well as best practices to help meet that goal.

SMRF PROCESSING:

Negative errors occur when a household's SMRF is not processed completely and benefits are incorrectly terminated.

RECORDING SMRF ACTIONS

When a SMRF is submitted either through ACCESS or as a paper form to be processed by the worker, the SMRF must be recorded as "complete" on the "View/record Six Month Report Actions" page in CWW. Paper forms can be recorded as "received" by clerical staff or the CDPU and later recorded as "complete" by the worker processing the form. SMRFs submitted online through ACCESS are submitted as "complete" since the member is not allowed to submit the online SMRF unless all the questions are answered and the form is signed.

After the SMRF is recorded as "complete" and all verifications submitted, eligibility must be run and FoodShare benefits confirmed in order for the SMRF status to updated to "processed". If the SMRF status it not updated to "processed", the FS benefit will continue to fail.

CARES looks at the last action recorded for the SMRF when eligibility is run. If the SMRF was marked as "complete" but then later marked as "received", CARES will only look at the "received" action code and fail the case for not returning a complete SMRF. The "complete" action item must be the last action entered prior to running eligibility.

If the "complete" action date is after the month the SMRF is due (month 6), CARES will also continue to fail the case. When a SMRF is submitted or completed in month 7 and the Break in Service policy applies, the action date entered should be the last day of month 6 so CARES will recognize that the SMRF requirements have been met. Workers must enter case comments why the date was entered for the action code. See [Process Help 3.13.3](#) for instructions on processing a SMRF when using the Break in Service Policy.

➤**REMINDER:** Even though the SMRF has been marked as complete and all verification has been updated in CARES, eligibility must be run on the case and benefits confirmed to update the SMRF status to 'processed'.

PROCESSING ONLINE SMRFs

Step by step instructions for processing an online SMRF can be found in [Process Help 3.4.6](#). The SMRF must be linked to the existing case by clicking on the "Start/Continue Processing Inbox Item" on the SMRF Summary Page. The SMRF actions must be entered by the worker. The Action Date for an online SMRF is always "CMP" and the date of submission will display within the event panel across the top of the page.

The SMRF driver flow will be started once the SMRF is linked to the case. The worker must complete the driver flow, request any necessary verification in writing and once all verification is submitted, eligibility must be run and benefits confirmed open. If the requested verification is not submitted timely, an "NV" code must be entered, eligibility run and the FS failure confirmed. (See section below for correct processing of verification at SMRF)

If an online SMRF cannot be linked to the case because of an old ACCESS submission that was not processed, the "No Action Required" option on the SMRF Summary should be selected. The worker must then process the SMRF by entering the "complete" action code on the "View/record Six Month Report Action" page. The date the SMRF was submitted must be entered as the completion date. Process the changes reported on the SMRF manually. Document in case comments why the SMRF was processed manually and contact the CARES Call Center to have the old ACCESS submission status updated.

If an online SMRF cannot be linked to the case because no SMRF is due, check the FS review date on AGOR to make sure a new certification period has not been set or the review date has not been changed. If a new certification period has been set because a renewal has been completed, mark the SMRF as "No Action Required" and document the reason in case comments. Review the SMRF for any reported changes and act on those changes according to policy.

If the FS review date on AGOR has been incorrectly reset, the SMRF must be processed manually.

VERIFICATION:

FS Negative errors occur when an adequate notice for a verification request is not sent to the household in writing, a case is denied or terminated prior to the verification due date and when a case is denied or terminated for non-verification of information that is not required to be verified.

VERIFICATION AT APPLICATION

Once the verification is requested, the FoodShare Group has 30 days from the date of the initial application or 10 days from the date of the verification request, whichever is greater, to provide the agency with the requested verification.

A negative action to deny the application for not verifying requested information should not be taken until the 30th or 10th day, whichever is greater. If the 'NV' code is entered for the item pending verification and the documentation is submitted on the due date, the verification should be processed as timely and the "NV" code removed. Eligibility should be re-determined using the verification submitted. If the verification is submitted after the due date, the application must be denied and the household would have to re-apply.

VERIFICATION AT RENEWAL

FS Renewals must be completed prior to the last day of the renewal month. An interview must be completed within the renewal month of the current certification period to be considered timely. If the household fails to complete a timely interview, FS will close effective the last day of the renewal month and a new FS application is required. A termination notice is generated during the Adverse Action batch process informing the household their benefit will end at the end of the month because their renewal has not been completed.

If FS closes due to agency delay in scheduling the interview or the household is not available to complete the interview until the end of the review month, benefits shall be begin as of the first day of the month following the renewal month to ensure ongoing benefits, as long as any requested verification is submitted timely.

When verification is requested during a renewal, the household has 10 days from the date of the request for verification to provide it to the agency. If the verification is not submitted by the 10th day, the worker must enter an “NV” verification code on or after the due date, run eligibility and confirm the FS failure.

If the verification is submitted on or prior to the last day of the renewal month, the verification code should be updated to the appropriate code, eligibility run and FS confirmed on AGECE. Since the FS is open through the last day of the month any verification submitted up to that point is considered valid and should be processed.

Example 4: Lucy’s renewal was due March 31st. She completed the interview with the worker on March 16th. Verification of her earned income was requested with a due date of March 26th. At Adverse Action in March a termination notice was generated to notify Lucy that her FS benefits would end effective March 31st. On March 26th, the worker updated the verification code to an “NV”. On March 30th, Lucy submitted the verification. The worker updated the verification code and reopened Lucy’s FS benefits effective April 1st.

TIMELY PROCESSING OF A REPORTED CHANGE:

The change reporting requirements for FS households is described in [FSHB 6.1.1](#). For reported changes that result in a decrease in benefits, process the change to allow for adequate negative notice to be issued to the customer. If verifications are not received within 10 days, and the FS case is not closed for at least one day, make the change effective the first of the month following the month verifications are received.

When a change is reported that causes a decrease in the household’s FS benefit the change is effective the first month after giving timely notice. If requested verification is not received within 10 days of the request, an “NV” verification code should be entered and the FS benefit terminated following Adverse Action notice. If the verification is submitted on or prior to the last day of eligibility the verification code should be updated to the appropriate code and the FS benefit reopened for the following month.

A reported change that causes an increase in the FS benefit including person additions, increases in expenses, etc. is effective the first of the month following the report month if required verifications are received within 10 days of the request for verification.

If verifications are not received within 10 days, and the FS case has not been closed for at least one day, the change is effective the first of the month following the month the verifications are received.

Workers must issue the appropriate FS auxiliary benefit as soon as possible but always by the 10th day of the month the increase in benefits is effective. If the auxiliary benefit is issued prior to the date the QC sample is pulled it may cause the case to be considered correct instead of in error.

Reported changes must be acted on and processed as soon as possible to ensure that correct benefits are issued for recurring months benefits.

Workers should request verification from the member as soon as possible, following the report of a change. Lack of verification is a common cause of case closure. When a change is reported and policy required the change to be verified, the agency is required to send a written request for verification. The household is allowed 10 days to provide the agency with verification. On the 10th day the case should be closed for lack of verification if the documentation has not been submitted. If the documentation is submitted on or prior to the last day of the closure month, the verification code should be updated and eligibility rerun.

Allow FS to reopen under the Break in Service policy when the FS closed for lack of verification after a change is reported or discovered, as long as the requested verification is submitted in the calendar month following case closure. Benefits are prorated from the date the required action was taken.

Example 6: Jason is certified for FS from March through February. Jason reports on April 5 that he began a new job. The worker processing the reported change requests verification of the new employment. The verification is due April 15. Jason fails to provide verification by the due date and the FS benefit closes effective April 30. Jason provides the verification on May 8. Jason's FS benefit can reopen using the Break in Service policy without requiring a new FS application. May benefits are prorated from May 8th when the verification was submitted. Jason's certification period remains the same (March through February).

CARES:

There are no CARES/CWW changes associated with this.

CONTACTS:

BEPS CARES Information & Problem Resolution Center

*Program Categories – FS – FoodShare, MA – Medicaid, BC+ – BadgerCare Plus, SC – Senior Care, CTS – Caretaker Supplement, CC – Child Care, W-2 – Wisconsin Works, FSET – FoodShare Employment and Training, BC+ Core – BadgerCare Plus Core, CF – Children First, EA – Emergency Assistance, JAL – Job Access Loan, JC - Job Center Programs, RAP – Refugee Assistance Program, WIA – Workforce Investment Act, Other EP – Other Employment Programs.

DHS/DHCAA/BEPS/SE