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TO: **Economic Support Supervisors  
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Training Staff  
Child Care Coordinators  
W-2 Agencies  
Workforce Development Boards  
Job Center Leads and Managers**

FROM: Amy Mendel-Clemens  
Communications Section  
Bureau of Health Care Eligibility  
Division of Health Care Financing

**BHCE/BWP OPERATIONS MEMO**

No: 07-53

DATE: 09/11/2007

FS	<input checked="" type="checkbox"/>	MA	<input type="checkbox"/>	SC	<input type="checkbox"/>
CTS	<input type="checkbox"/>	CC	<input type="checkbox"/>	W-2	<input type="checkbox"/>
FSET	<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"/>	WtW	<input type="checkbox"/>		
Other EP	<input type="checkbox"/>	★			

**PRIORITY: HIGH**

**SUBJECT: FoodShare Break-in-Service Policy**

**CROSS REFERENCE:** FSHB 1.2.1.2 Requests for Verification  
FSHB 2.2.1.4 Review Processing Timeframe  
FSHB 6.1.2 SMRF  
FSHB 6.1.3 Reported Changes during the Certification Period

**EFFECTIVE DATE:** October 1, 2007

**PURPOSE**

This memo introduces a new FoodShare (FS) policy for recently closed cases when changes are reported or discovered during the certification period, at SMRF and at recertification.

**BACKGROUND**

Currently, any break-in-service in a FS case requires a household to reapply if they wish to receive FS. A break in service means that the FS case has closed and at least one day has passed. Failure to provide timely verification is a common cause for case closure. The FS case closes effective the last day of the month following adverse action, if a requested action is not taken by the household.

The State of Wisconsin has received approval to waive the requirement set forth by FNS regulation that requires a new application after a FS case has been closed for at least one day. This means that under some circumstances, workers will now be able to reinstate ineligible cases without requiring a new application.

The reason for case closure must be fully resolved during the calendar month following case closure prior to reopening the case. The intent of this policy is to reduce workload for local agencies by decreasing the number of FS applications necessary to establish and maintain FS eligibility.

### ***NEW POLICY***

Effective October 1, 2007, a new FS application will no longer be required under the following circumstances:

1. **Recertification:** Allow FS to reopen if the requested action is completed in the calendar month following the end of the current certification period, as long as the interview was timely.
2. **SMRF:** Allow FS to reopen if the requested action is completed in the calendar month following the month the SMRF was due, as long as the SMRF is returned timely.
3. **Changes during the certification period:** Allow FS cases to reopen when 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.

### **PROCESS**

#### **Recertification**

Allow FS to reopen at recertification if the requested action is completed in the month following the end of the current certification period, as long as the interview was timely.

- An interview must be completed within the review 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 review month at adverse action and a new FS application is required.
- If FS closes for lack of verification or other reasons after a timely review and the household takes the required action within the calendar month following the certification period, the agency shall reopen FS and prorate benefits from the date the household took the required action. The certification period will begin with the month after the review was due.
- 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 restored back to the first of the month to ensure ongoing benefits, as long as verification is timely. (Refer to example 2)

To issue correct benefits and avoid Quality Control (QC) errors, the agency must take specific actions to prorate benefits. Refer to the Prorated Benefits section in this memo.

**Example 1:** Holly completes a timely FS review on July 12, but does not have verification of her wages from Marigold's. Holly's worker, Jeff, issues a request for verification of earned income. Holly fails to provide verification and her case closes effective July 31. On Aug 5, Holly provides verification of her wages. Jeff changes the date on the *FoodShare Request page* to August 5 and issues prorated benefits from August 5 through August 31. Holly's previous FS certification period ended on July 31, 2007. Her new certification period runs from Aug 5, 2007 to July 31, 2008.

If Holly responded timely to Jeff's request for verification and submitted her verification in July, but Jeff did not process the verification until August, benefits would have been issued back to August 1, due to Jeff's late processing.

**Example 2:** Ruby calls her worker on August 21 to schedule a FS review but the only appointment available is not until September 4. Ruby completes her review but does not have verification of her wages from Sunny's Craft House. Ruby's worker, Kim, issues a request for verification of earned income with a verification due date of September 14. Ruby submits the necessary verification on September 10. Because Ruby submitted her verification timely (within 10 days) and because the agency was unable to complete the interview in August, Kim issues benefits to Ruby back to September 1.

Had Ruby submitted the necessary verification after September 14, Kim would not issue benefits back to the first but only to the date verification was submitted.

### SMRF

Allow FS to reopen at SMRF if the requested action is completed in the calendar month following the month the SMRF was due, as long as the SMRF is returned timely.

- To be considered timely, a SMRF must be returned to the local agency by the 5th day of the process month (month 6) or no later than the end of the process month. An incomplete SMRF returned prior to the end of the process month is considered timely and must be acted on by the agency. If the HH fails to return a timely SMRF, FS will close effective the last day of the process month at adverse action and a new FS application is required.
- If FS closes for lack of verification or other reasons after a timely SMRF is submitted and the household takes the required action within the calendar month following the report month, the agency shall reopen FS and issue prorated benefits from the date the household took the required action.
- If FS closes due to agency delay in processing a SMRF, benefits shall be restored back to the first of the month.

To issue correct benefits and avoid QC errors the agency must take the actions found in the Prorated Benefits section in this memo.

**Example 3:** John has an open FS case with a certification period of April through March with a SMRF due in Sept. John returns the SMRF to his worker Jayne by Sept 4, but forgot to provide a signature. Jayne records the changes reported on the form and returns the form to John on September 10<sup>th</sup> asking him to sign and return the form. The signed form is not returned and the case closes effective September 30th.

John returns the signed SMRF on Oct 25. Jayne enters the date the SMRF was returned as the Program Filing date on the *FoodShare Request page*, records on the View/Record Six Month Report Actions page that the SMRF was complete as of Sept. 30th, runs SFEX and confirms John's continued FS eligibility.

**NOTE** ➤ The SMRF must have an action date on the View/Record Six Month Report Actions page that is in the process month otherwise CARES will continue to fail the case for lack of SMRF.

CARES will issue prorated benefits from Oct 25. The FS certification period for John's case remains the same, April through March.

Had John responded timely to Jayne's request for a signature but Jayne did not process the form until Oct, benefits would have been issued back to Oct. 1, due to Jayne's late processing.

If John had returned the signed SMRF on Nov 1, which is beyond the month following the report month, FS would have closed and he would need to reapply.

**NOTE** ➤ This new policy does not have an impact on Child Care SMRF processing.

### Changes during the Certification Period

Allow FS to reopen when 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.

- If FS is closing for lack of verification and the household takes the required action in the calendar month following case closure, the agency shall reopen FS and issue prorated benefits from the date the action was taken.

**Example 4:** Jule has an open FS case with a certification period of February through January. Jule reports on March 25 that her sister Eve moved in on March 15. Jule's worker requests verification of Eve's eligibility information by April 4. Verification is not provided by April 4 and the FS case closes effective April 30. Eve provides verification to the local agency on May 15. FS reopened without a new application with benefits issued from May 15 forward. Jule's FS certification period remains the same, February through January.

### PRORATING BENEFITS

To issue correct benefits and avoid QC errors the agency must take the following actions to prorate benefits:

1. Update the Program Filing date on the *FoodShare Request page* to reflect the date the required action was taken by the HH,
2. Record the required action by the HH,
3. Run SFEX and confirm eligibility,
4. Check CARES Mainframe screen *AGOR* to ensure that the FS certification period has not been extended beyond the original 12 months, and
5. Document actions in case comments.

## **CONTACTS**

BHCE CARES Information & Problem Resolution Center

★Program Categories – FS – FoodShare, MA – Medicaid, SC – Senior Care, CTS – Caretaker Supplement, CC – Child Care, W-2 – Wisconsin Works, FSET – Food Stamp Employment and Training, 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.  
DHFS/DHCF/BHCE/JE/MR