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

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BEM/DFS OPERATIONS MEMO					
No: 09-24		DATE: 7/22/2009			
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+ 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	
PRIORITY: HIGH					

**SUBJECT: Address and Wisconsin Residency Verification Requirements for FoodShare**

**CROSS REFERENCE:** [FoodShare Eligibility Handbook \(FSHB\) 1.2.3.5](#)

**EFFECTIVE DATE:** Immediately

**PURPOSE:**

This memo is intended to clarify requirements regarding verification of address, state residency, and household composition for the FoodShare program.

**BACKGROUND**

The State of Wisconsin recently received information as part of our Quality Assurance (QA) case review process that warrants clarification of the address and residency verification policy for FoodShare (FS). Federal QC does not require verification of address for categorically eligible households. Several QC errors were cited for cases that failed for not verifying address because the case record did not clearly indicate whether verification of address or state residency was being requested. This Operations Memo is intended to explain the differences in address, household composition, and residency verification policy.

## **CURRENT POLICY**

The FoodShare Handbook (FSHB) 1.2.3.5 currently states:

Residence must be verified at the time of application and whenever a change in residence is reported. Do not require any specific type of verification.

An exception exists for homeless persons ([3.2.1.3](#)) and migrant farm workers. Do not require residence verification for homeless persons or migrant assistance groups newly arrived in the area. Do not verify shelter and/or utilities ([4.6.7](#)) as part of residence verification. That is a separate verification requirement.

## **POLICY CLARIFICATION**

Address, Wisconsin residency, and household composition are separate and distinct eligibility factors with different verification requirements. Each factor is outlined below with corresponding verification process and procedures:

1. "Address" refers to the actual place where the household resides.
  - An address is required to be provided unless a household is homeless, a migrant, or newly arrived in Wisconsin. Verification of address is not required.
  - A household does not have to reside in a permanent dwelling.
  - A household may use a general delivery address when it applies.
2. "Residency" refers to Wisconsin residency.
  - State residency is a required eligibility factor that must be verified through documents or collateral contact,
  - If the address on the application is not a fixed Wisconsin mailing address and there is no additional information presented at the time of the interview to verify that the household resides in Wisconsin, the worker should attempt to obtain verification of state residency,
  - Workers should verify state residency for categorically eligible cases only if the information was not already verified for another program (e.g. BadgerCare Plus). In other words, don't over verify.

### **ADDRESS**

An address must be provided in order to set a FoodShare filing date. An application is considered filed the day the FoodShare agency receives a request for FoodShare with a name, address, and valid signature.

A household can give a general mailing address and the application filing date will be set if the application also includes the applicant's name, and signature. If an address is not given on the application, the application is not valid and cannot be used to set the filing date unless the applicant is homeless, a migrant or has recently moved into Wisconsin and does not yet have a fixed mailing address.

### **Verification of Address**

Verification of address is not required for FoodShare eligibility.

**CARES Processing - Address**

It is acceptable to enter an NQ in the Address Verification field on the General Case Information page if there is no other documentation verifying address.

**WISCONSIN RESIDENCY**

State residency is an eligibility requirement. If it becomes known that a FS applicant or member does not reside in Wisconsin, action must be taken to deny or terminate FS benefits for this individual.

State residency must be verified at the time of application and thereafter whenever it becomes questionable. Residency is an eligibility factor verified through many types of documents and/or a collateral contact. Do not require any specific type of verification. Although homeless persons and migrant farm workers are not required to provide an address, state residency verification must still be required for these groups.

**Verification of Wisconsin Residency**

Examples of acceptable verification of state residency include but are not limited to (FSHB 1.2.6.1):

- Collateral Contact
- Current rent receipt that shows a Wisconsin address
- Current mortgage receipt
- Current lease agreement
- Landlord inquiry
- Current utility bill with address and responsible person's name
- Check stub with current address
- Driver's license
- Home visit
- Subsidized housing authority approval
- Post office statement or collateral contact
- Library card
- Voter registration
- Piece of mail received at claimed residence
- Real estate tax statement or receipt
- Weatherization program approval or denial
- Renter or homeowner's insurance documents
- School registration record
- Letter from employer offering job
- Telephone book
- Motor vehicle registration
- List of residents from a treatment center official, group home, etc.
- Written statement from non-relative

**CARES Processing – Residency**

Currently there is no verification field attached to the Wisconsin residency question on the Current Demographics page in CWW. Until CARES can be updated to pend the case for verification of Wisconsin residency, workers must use the Loss of Contact field on the General Case Information page.

Anytime information is obtained that determines an individual does not reside in Wisconsin, the worker must document the source of the information in case comments and then update the "Resides in WI" field on the Current Demographics page to No.

If a determination of state residency cannot be made at application based on verification provided at intake the worker must:

- Enter a "?" in the Loss of Contact field on the General Case Information page to pend FS. Add text to the verification checklist via CNIN stating that state residency requires verification. Explain to your customer possible sources to verify state residency during the intake appointment.
- If information is provided by the customer, make the necessary updates to the case.
- If there is no response from the customer by the verification due date, update the Loss of Contact field with a "Y". Enter case comments to document the denial of FS due to failure to verify state residency.

A worker may also become aware of information that makes Wisconsin residency questionable on an ongoing FS case. Examples of questionable residency include:

1. Refusing to provide the address where the food unit is living,
2. Notices returned as "undeliverable with no known forwarding address",
3. Agency receives unclear information.

When Wisconsin residency is questionable the worker must:

- Enter a "?" in the Loss of Contact field on the General Case Information page to pend FS. Add text to the verification checklist via CNIN to explain to the customer what information needs to be clarified (which FS unit member(s)' state residency requires verification).
- If information is provided by the customer, make the necessary updates to the case.
- If there is no response from the customer by the verification due date, update the Loss of Contact field with a "Y".

If a FS case is also open for health care, and information is received that causes residency to be questionable for both FS and health care the worker must:

- Enter a "?" in the Loss of Contact field on the General Case Information page to pend FS. Enter a "Q?" in the Address Verification field on the General Case Information page to pend health care.
- Add text to the FS verification checklist via CNIN to explain to the customer what information needs to be clarified (which FS unit member(s)' state residency requires verification).
- If information is provided by the customer, make the necessary updates to the case.
- If there is no response from the customer by the verification due date, update the Loss of Contact field with a "Y" and enter a "QV" in the Address Verification field.

**HOUSEHOLD COMPOSITION**

Household Composition affects eligibility. If the household composition is determined questionable, verification is required.

NOTE: FS Households that are subject to reduced reporting requirements are required to report changes in household composition at application, review, and upon submission of a six-month report form (SMRF) or when the change in household composition would result in additional income that would cause the food unit's total income to exceed 130% FPL for their reported unit size (FSHB 6.1.1.2). For these households, a report of a change in address does not necessarily make household composition questionable.

**CARES Processing: Household Composition**

If information is presented at application that causes household composition to be questionable the worker must:

- Enter a “?” in the Verification code field for the individual's living arrangement type on the Current Demographics page to pend FS, and
- Initiate an FEV if appropriate.

If the worker becomes aware of information that causes household composition to be questionable for an ongoing case s/he must:

- Enter a “?” in the Loss of Contact field on the General Case Information page to pend FS. Using CNIN, add text to the verification checklist to explain to the customer what information needs to be clarified.
- When the information is provided by the customer, make the appropriate updates to the case.
- If there is no response from the customer by the verification due date, change the Loss of Contact field to a “Y”.

**Example 1:**

Mary is applying for FS. She refuses to provide the street address where she is currently living. She will only provide a General Delivery (PO Box) address, but does not claim to be homeless. This brings into question both whether or not she is actually living in Wisconsin (State residency), and whether her presence in the home may have an effect on her case or another case (household composition).

Since state residency is questionable, the worker should follow the Request for Contact (FSHB 1.2.2.5) policy and process to obtain verification. Since Mary's household composition is also questionable, the worker should enter a “?” in the Verification code field for Mary's living arrangement type on the Current Demographics page and initiate an FEV, if appropriate. If verification of state residency is not provided by the verification due date, deny the case for failure to do so by answering “N” to the “Resides in Wisconsin” on the Current Demographics page. If Mary fails to provide clarifying information of her household composition or verification that is adequate for the worker to correctly determine Mary's food unit, by the verification due date, the worker must deny FS for failure to do so by entering “NV” in the Verification code field for Mary's living arrangement type on the Current Demographics page.

**Example 2:**

Margaret is open for multiple programs, including FS. Her Notice of Decision was returned to the agency as undeliverable with no forwarding address. Because of the returned mail, the agency determines that Margaret's Wisconsin residency is questionable. The worker must enter a "?" in the Loss of Contact field and a "Q?" in the address verification field, issue the verification checklists using the appropriate verification due dates, and add clarifying text to the FS verification checklist via CNIN. If acceptable verification is not received by the due date, the worker must enter a "Y" in the Loss of Contact field and a "QV" in the address verification field, run eligibility and confirm on AGEV to close the affected programs.

**Example 3:**

Susan is applying for FS and provided a Wisconsin street address, but failed to verify her shelter expenses. Since she works in Wisconsin and the address on her pay stub matches the address she provided, state residency is considered to be verified and is not questionable. Additional verification is not needed and because the shelter expenses were not verified those expenses will not be used in the FS allotment calculation.

**CONTACTS**

BEM 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, 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/BEM/ME