



On Target

special edition

October '10 Contributors

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Students and Interim Change

Several times a day the SNAP policy unit receives this question: “I’m processing this interim change report and the person says they are going to school now. They did not tell me they were a student at certification. Do I need to follow up on this?”

The answer is: It depends. The Interim Change Report (ICR) form does not require clients to tell us about their student status. There are many ways a student can meet the student criteria and none are addressed on the ICR.

Federal regulations do not require clients to report on their student status at Interim Change. Rather than imposing possible access barriers to clients, increasing workload and requiring follow up on every single student at ICR time; SNAP policy removed the student question.

For most cases, if someone reports they are a student and:

- does not provide you with a financial aid award letter or anything requiring follow up, just narrate, “follow up on student status will be done at recert”.
- provides a financial aid award letter showing nothing but excluded income, no follow up on student status is necessary as none of the income is countable. Narrate that student status will be reviewed at recert.
- provides a financial aid award letter showing countable educational income, follow up on the income and their student status. The key here is if there is countable educational income. For example, the financial aid award letter shows Title IV Work Study, Non-Title IV Work Study, and a Student Loan. Since Non-Title IV work study is not excluded, follow up is needed to determine if there is countable income. This would also entail determining the person’s student status.

Another common question: “If the client was an eligible student at cert based on working and is now reporting they are no longer working, what do we do?”

The answer is: Remove the income, and do not follow up on student status until recert.

Remember the ICR form does not require clients to report their student status, and there are many ways a student can meet the student criteria, and these are not addressed on the ICR. Please check out [SS-IM-09-041](#) for a refresher.

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Students in higher education who are receiving Training Unemployment Insurance (TUI) are eligible students for SNAP purposes. Students receiving TUI can be identified on the ECLM screen by the FO (Field Office) code of 070. As always, workers must narrate the basis of the student eligibility decision. Please refer to policy transmittal [SS-PT-10-001](#) issued on 2/5/2010 for more information.

When Do I Check the Business Registry?

More and more SNAP clients in the past year are self-employed or otherwise receiving income from business. There are already several screens that eligibility workers need to check at cert and recert. Should you automatically add the Secretary of State's (SOS) business registry to that list?

Not always. Most clients accurately report their income. Others may report only the portion they draw from their business each month in earnings or fail to mention the business at all. If you see any of these red flags on the case, that should lead you to ask about other household income. Follow-up includes checking the SOS site when:

- ⇒ Paychecks are always in even dollar amounts (e.g., \$800, \$1100).
- ⇒ Paychecks are personal checks or handwritten business checks.
- ⇒ Wages are too low to cover the client's claimed expenses.
- ⇒ Service employees (nail technicians, hairstylists, etc.) report no tips.

You can check the SOS Business Registry (Corporate Information) by client name or business name. Follow the link to the Oregon Business Registry from the SNAP webtools page:

<http://www.dhs.state.or.us/training/foodstamps/webtools.htm>

The page also has links for California, Idaho, Washington and the Construction Contractors Board. It's especially useful to check on neighboring states if you live near a border.

The site contains lots of useful information about the type of business (click on Entity Type), the business address (often the same as the client's) and the company's officers. To keep their registry status current, business owners must supply earnings records to the Secretary of State. That is a good clue that they will have income records we can use for verification.

Please use these tips as a starting point for deciding when to add another verification screen to your eligibility process.

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New Tools

SNAP Policy has added new tools to the SNAP Webtools pages. The Oregon Business Registry (Secretary of State Page) has been there for a long time. But thanks to some great feedback, we have now added the [California](#), [Idaho](#), and [Washington](#) Business Registry pages as well. Please remember, if you have a great tool, cheat sheet, helpful website or other work saving idea you would like to see posted on the SNAP Webtools pages, please let [Sarah Lambert](#) or [Dawn Myers](#) know.

SNAP SRS cases with Returned Mail

Effective July 1, 2010, staff are no longer to act on returned mail for SNAP cases in SRS. This change is being made because there have been changes in Federal Regulations.

Because of these federal changes, FNS has given Oregon two options: The first – request a waiver to act on all changes for cases in SRS. The second – not act on any changes unless they are required to be reported or verified upon receipt...this includes returned mail.

Because of the skyrocketing caseloads and amount of work being done in the field, we decided not to request the waiver to act on all changes for SNAP clients in SRS. Instead we went with the option of no longer acting on returned mail.

Cases are not to be closed for returned mail, but should be updated to reflect a new mailing address if one is reported, if there is an updated address on another case, or on the piece of returned mail. If no updated address is available, simply narrate the returned mail. It is not necessary to file the piece of mail.

There have been NO changes made to the way we act on returned mail for CRS or TBA cases. CRS cases with returned mail are acted upon and are business as usual. Returned mail on TBA cases should be narrated only.

There have been NO changes made to the way we act on mail being forwarded Out of State. Please see Multiple Program Worker Guide #20, effective July 1, 2010 to see the procedures for returned mail and acting on mail returned when someone moves out of state.

For further information, please take a look at transmittal, [SS-PT-10-013](#).

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Since MAA is always the first program that workers determine eligibility for, it is appropriate to dedicate this article to MAA income and budgeting.

Budgeting Sequence

A common mistake workers make in MAA is treatment of income. For MAA, workers should use the actual amount received and anticipated to be received in the budget month *for new applicants* or in cases where the medical has been closed and the client is applying again. This is true for all types of income, including stable and annualized income.

Example 1: A dad comes in applying for benefits for himself and his daughter, DOR 03/22/10. He reports he just started a full time job but will not be paid until next month, 04/01/10. The worker verifies this as true. Assuming dad and child meet all other requirements, dad and child will be MAA eligible on the DOR and will be EXT in April.

Example 2: A mother applies for medical for herself and her son on March 10. Her only March income is anticipated to be two \$125 UC checks. She does not receive the extra ARRA \$25 UC payment. Using actual anticipated income, she and her son are MAA eligible for March with countable UC income of \$250.

In April, her UC income is converted and $4.3 \times \$125$ or \$537.50 is used to determine April MAA eligibility. The family will be over income for April and should be converted to OHP after sending a 10-day notice of reduction to the mother.

For redeterminations where the benefits have not closed and client has reapplied timely, the budgeting sequence is different. In these cases, convert all types of income in the budget month, including stable and annualized income.

Example: Mary and her child are reapplying for medical in May which is the budget month. Mary just started receiving UC and in May will receive three checks, each check is \$125. Since this is a redetermination, convert the income for the budget month of May using $\$125 \times 4.3$. Mary and her child will be over-income for ongoing MAA medical benefits and the worker should determine eligibility for OHP.

Self-Employment

Except for clients involved in the microenterprise component of the JOBS program, no business costs are allowed when determining eligibility. The budgeting sequence is the same as above. Actual income is used in the budget month for new applicants or in cases where the medical benefits have closed and the client is applying again.

Self-employment is an area where one can see how MAF can be useful for those who do not qualify for MAA. MAF, situation 5, allows business costs.

REMINDER: The ARRA Making Work Pay Tax credit is considered an exclusion for each person with earned income and should automatically come off the top of the gross income for MAA, and before business costs for MAF.

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Are you reviewing for ALL medical programs before determining a client ineligible?

When a client indicates that they have a disability on question 2 and 2(a) on page 7 of the DHS 415F or answered “yes” to question 6 or filled out the OHP7214 of the OHP7210, they should be referred to SPD, *if appropriate*, using your local referral process. Only make the referral after reviewing for all “Plus” Self-Sufficiency medical programs. SPD referrals for applicants who may only be considered for OHP-OPU should be completed *immediately*, even in cases where the applicant will be pended for OHP-OPU eligibility. Check with your lead worker or manager for more information about your branch’s referral process for OSIPM. CAF Self-Sufficiency and SPD have jointly developed a Worker Guide explaining the process. The SPD WG-4 “Presumptive Medicaid Decision Procedures” is available at: <http://www.dhs.state.or.us/spd/tools/program/osip/wg4.htm> Clients referred to SPD for an OSIPM eligibility decision should be sent the GSOSIPR “OSIPM Referral” notice available on NoticeWriter. Clients denied for Self Sufficiency medical prior to the referral will also need to be sent the *Notice of Self Sufficiency Medical Program Eligibility Decision (DHS 462C)*. The **DHS 462C** is available on the DHS forms web page and as a two part Notice Writer notice CM462C1 and M462C2.

Two Parent Pursuit of Assets and Deprivation Q & A

This article looks at common questions regarding the pursuit of assets, deprivation and good cause in two-parent households. These scenarios are all two-parent households being determined for MAA. Also, see [SS-IM-09-016!](#)

Q: Who must pursue assets?

A: CAF SSP medical program clients are required to actively pursue assets for which they have a legal right/claim. For example, if both parents had a potential UC claim, the worker should pend **both** adults to pursue UC benefits – not just the PWE. Tip: You can use the EPC2 screen to verify the client has a potential claim! Access the EPC2 screen with F22 from the WAGE screen.

Q: What if one of the parents never worked outside the home?

A: If one or both of the parents report they have not worked outside the home, and there is no indication they worked in another state, accept the statement from the applicant unless questionable. It would be questionable if the worker received conflicting information from another source such as WAGE, Work Number, etc. Don't ask the individual to pursue UC benefits if there is nothing to indicate there is a potential claim. Narrate there is no work history found for this parent.

Q: When can a worker determine good cause (for either pursuit of assets or deprivation)?

A: Any time after a discussion with the client. In determining good cause for a job loss, you do not have to wait for a decision from the Employment Department.

Q: What happens if the worker determines good cause on a PWE's job quit but later finds out that the PWE was fired due to theft?

A: Look at converting the case to OHP as the family does not meet the requirements for MAA. The DOR would be the day the worker found the case needed to be converted to OHP. Remember to give a timely continuing benefit notice before reducing the parents' medical benefits.

Q: When determining deprivation, does the worker need to wait for a UC decision to determine un/underemployment for the PWE if it is already determined that the other parent meets incapacity?

A: No, if incapacity is already established (i.e. the parent is receiving SSI or SSD), then the family meets deprivation for a two-parent household.

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Unnecessary Pending...DHS Form 223

There have been many questions received by the policy unit about what is needed for verification in the SNAP program. In the SNAP program, minimal verification is required to be provided by applicants ([SNAP.B.11](#)):

- Identity of Head of Household – This does NOT need to be picture ID.
- Income – For all persons in the financial group.
- Expenses for Medical Deductions and Child Support.
- Social Security Number – Applicants only need to tell us the number, they do not need to show us the card.

The policy unit has seen the use of many different “required verification” forms developed in local offices. These forms are given to applicants, telling them what they need to bring to their interview. Some of these “required verification” forms give incorrect information and require clients to bring in more than necessary. To avoid extra work for staff, and to eliminate access barriers to the SNAP program applicants, the [DHS 9774 Show proof and apply for SNAP poster](#) has been developed. Each branch was mailed this poster and they were instructed to post them in the lobby. If your branch is in need of another poster, please contact SNAP policy analyst [Sarah Lambert](#).

Effective immediately, please discontinue use of all local “required verification” forms. Offices that wish to give SNAP applicants examples of what they need for verification should use the [DHS 223](#) (Proof for Eligibility) form. For further clarification please reference transmittal [SS-AR-10-007](#).

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The e-mail address for SNAP questions is now Policy, SNAP (SNAP.Policy@state.or.us). E-mails sent to Policy, FS will be forwarded.

Keeping your eyes open for MAF...

A commonly overlooked scenario: A child applying with a caretaker relative that is not requesting benefits for themselves can be MAA eligible in a non-parent household situation (NPH). Don't forget to include unearned income such as child support (minus the child support exclusion), SSB, etc.

Also, if a caretaker relative with a spouse with income over the MAA standard is requesting medical along with the child, you can consider MAF scenario #4 and deem the spouse's income. The spouse with income is removed and the needy caretaker and the child form a separate MAF filing group. If the spouse has any dependent children, they must also be removed. ([FSM 8, Medical Assistance, section 2](#))

Medicaid Quality Control

The DHS 852, NED and You

NED has been around for years. He (or she) is in a SNAP SRS household where all the **adults** are elderly or disabled and no one in the group has earned income. NEDs can have children, too, as long as they have no earned income.

Tell FSMIS that NED is on the case by coding NED in the HH Types field on page 1. This code stops the DHS 852 (*Interim Change Report*) from going out in month 5. Adding this code is critical, because these clients are not required to complete the form. If the 852 is sent, they must return the completed form and have it processed or their SNAP benefits will suspend, then close. This is causing QC errors, reducing or stopping benefits unnecessarily, and represents a serious customer-service problem.

For non-NED cases, process the *Interim Change Report* as follows:

- Use the **SRS** transaction code and **ADJ** if making changes.
- The effective date is always the 1st day of the 7th month of the cert.
- Type **Y** in the Rept field.
- Do not change the Rpt Exp date; it will be updated by the system.
- Enter **RU** in the Next Code field or press F9.

Y in the Rept field advances the Rpt Exp date. If this isn't done, the case will suspend every month. Processing the 852 isn't too tough as long as you get the coding right and remember to keep NED out of it.

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SSNs and TPQY

You have probably heard – many times – not to pend for proof of Social Security numbers. We can easily get that information off the system from W204 if the client is already in our system. Even with the huge influx of new, first-time applicants, most folks have already come through our doors before.

What if they haven't? For SNAP, you can (and should) enter a new case in pending (PEN) status with only the name, address, SSN and filing date of the head of household. Once the case is on-line, running TPQY will give you confirmation within two business days. If the system cannot verify the number, that is the time to check with the client again to make sure the number they have given you is correct.

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Verifying Income from a Loan

You are interviewing Trish about how she gets by with no job. Trish says her mom lends her \$500 every month to pay her share of the bills. Your next step? Ask Trish for mom's contact information so you can verify this directly with her. Any potentially countable income has to be verified; if this money from mom doesn't meet the definition of a loan, it is countable as OTH on FSMIS.

For SNAP, the loan agreement may be written or oral and state when repayment is due to the lender. So, if mom confirms this is a loan and she expects Trish to pay it back when she can afford it, narrate mom's statement and exclude it. If mom says she never expects to see a penny of that money and has never asked for it, count as unearned.

Just because a repayment agreement can be verbal doesn't mean we can take the client's word for it.

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