How to Complete a Food Benefit Negative Case

This procedure describes how to complete a food benefit negative case from the perspective of the reviewer (SQCR). For the most part, all negative reviews are completely desk reviews and do not require contact with the client however; it may require contact with "the agency" (DSS) via email.

There are several basic non-specific steps to completing a negative review as follows:

1. Review the circumstances of the action and ensure the action is subject to review (1332)
2. Review the action taken and determine if the action is valid or invalid based on the known circumstances in the case record (electronic file) (1350.2)
3. Review all of the information and determine if additional information is needed from the agency to help support the negative action taken (optional) (1350.3)
4. Review Food Benefit Policy (section 9000) to determine if the negative action followed policy/procedures for denials, terminations and closing of food benefits
5. Document and report findings (write-up and findings form if necessary) (1350.4)
6. Enter findings in SNAP-QCS and made combined file

All negative reviews need the following screen prints from AWW (these should be placed in the "review documents" folder in each review):

- Case Summary
- Eligibility Budget Details
- Food Benefits Issuance Summary (even if the screen is blank, print the screen)
- Case Comments (cover the date of the negative action and all relevant information leading up to the date of the action; this may include interviews, changes reported, E&T updates, etc.)
- Letter Summary (if any letter pertains to the negative action, add the letter to the "review documents" folder)

SQCR will also print the following for each review:

- The notice stating the negative action taken (it should be the one denial/termination letter for the month in question)
- Any notices that may pertain to the negative action should also be added to the "review documents" folder. You must put "Non-Sample" in upper right corner of the notice so it will not be confused with the notice being reviewed. Only print the 1st page of the non-sample notice.
- Any ASSIST Applications will need to be added to the "review documents" folder as well

- Log into DIS, enter the case number, print the DIS title page after sorting the information by date order
    - Add the DIS title page to the “DIS” folder for each review
    - Print all documents pertaining to the negative action or the documents that assist you in reviewing the negative action to the “DIS” folder
    - If any information that is needed is not found in DIS, send an email to the agency to include the supervisor and operations administrator for the area/team assigned at the time of sampling
- For all negative reviews for being over gross or net income, print the LIHEAP screen, even if there is no information on the screen
- For all negative reviews for being over gross or net income, do not worry about the work deduction; just the standard deduction
- For all ABAWD reviews, print the ABAWD clock summary and ABAWD clock details screens and add to the “review documents” folder

Now that we have covered all of the necessary printing, we will move towards the specific reasons for negative actions. Follow Chapter 13 of the FNS-310 Manual to ensure you are following the federal guidelines, and section 9000 of the DSS Policy Manual (along with the Administrative Notices in the Policy Manual).

HELPFUL TIP: All notices are required to be reviewed for timeliness, no matter the reason for negative action!!

Ineligible Student – 9010

a. Review the information in the application and make sure it matches what is in the case record
b. Check the age of the student and refer to policy for age appropriateness and exemptions (9010.1)
c. Check the household composition. Note: negative actions for an ineligible student would not close/deny an entire household, only the ineligible student. If an entire household is closed or denied, determine if there are multiple reasons for the negative action. For example, the other members are ineligible aliens
d. In cases where verifications are not located, check AWW under school enrollment to determine the most recent update prior to the date of the action. Print this screen, when relevant
e. Review the correctness of the action based on documentation located
f. Complete student negative template. Make sure to include the date and description of the actual reason on the notice and the validity of the action
g. Enter findings in SNAP-QCS

ABAWD – Administrative Notice A-03-2019 (Abled Bodied Adults Without Dependents) – 9018, 9013.1

a. Review the information in the application and make sure it matches what is in the case record. It could also be a change reported or even a recertification (renewal). It will not always be an application.

b. Check the age of the client(s). If less than 18 check for student status, and if 50 or over, the client is no longer considered an ABAWD

c. Go into AWW and go to Post Eligibility, under Conclude open the ABAWD clock, print the ABAWD clock summary screen (add this to the "review document" folder

d. Click on month 1 in the summary screen and pull the ABAWD clock details, then print the details. The details screen will indicate when the 36-month period started and ends. Add this to the "review documents" folder.

e. The additional information needed in an ABAWD case is:

i. Benefit Issuance – Food Benefit Issuance – Print all food benefit issuances for the 36-month time period
ii. Print all case comments for the time period.
iii. In DIS print all information pertinent to the case for the 36-month period

f. Using the food benefit issuance screen review each month for the 36-month time period.

g. Check the correctness of the agency's recorded ABAWD month against the Food Benefit Issuance screen once completed. This will indicate if the ABAWD months are correct

h. Check for any ABAWD exemptions on the Interview sheet, Screening sheet, Application, or any other documents, and the Benefits Issuance Cash screen (for any month the client or clients were receiving cash assistance, they were exempt from ABAWD rules)

i. Review the correctness of the action based on documentation located

j. If the client is under 21 and living with parents, refer to 9013.1 for household definition

k. If the client is 18 and not living with parents, the client can be considered an ABAWD

l. The household can have two (or more) ABAWDs at a time

m. If the ABAWD has used months 1, 2 and 3 verify if the ABAWD is entitled to months 4, 5, and 6

n. Complete the ABAWD negative template. Make sure to include the date and description of the actual reason on the Notice and the validity of the action. Indicate the correct ABAWD months on the template

o. Enter findings in SNAP-QCS

Gross Income/Net Income – 9056, 9057, 9058, 9059, 9060, 9063,

a. Review the information in the application and make sure it matches what is in the case record

b. When the application is denied for Net Income print out the LIHEAP screen. This is under Supplemental Modules, Benefit Issuance. It is listed as Update LIHEAP Checks Disposition

c. Refer to 9063 for additional reasons and the eligibility rules on income

d. Income is converted based in how the individual is paid. Refer to 9063.2 for the conversion of income

e. Identify the source of income

Earned Income is reviewed as follows:

1. In the denial it will list all of the earned income for each household member that has earned income. The SQCR will need to ensure that all earned income is correct for each household member.

2. Go to the application entry screen and scroll down to employment

3. Check the employment screen and match the paystubs with the dollar amount used in the budget. Find the paystubs in DIS. If the paystubs are not found in DIS, SQCR may need to reach out to the agency to obtain these documents.

4. Print the employment screen if applicable

5. If the information is not in the case record check the following:

   - Check history under employment screen to see if the pays are from a different month
   - SQCR may need to log into The Work Number to obtain pay information
   - Review the Department of Labor (DOL) screens. Although the agency cannot use the DOL information to make a determination on food benefits, often DOL will point the SQCR in the right direction to find the necessary information

6. The application/recertification may contain a non-household member; refer to 9013.1 for household definition. If this is the case deem the income, the conversion is different for the deemed income - 9076

7. The application may have a person who is self-employed; the income is converted differently for self-employment - 9074

8. Income from an employer is converted according to 9063.2

Weekly pay 4.33
Biwekly pay 2.16
Semi-monthly pay 2

Unearned income is reviewed as follows:

1. The denial may include unearned income. Depending on where the unearned income is coming from, different screens may be required to be printed. In AWW under application, then unearned income and print that screen along with the following screens if they are part of the case:

i. Unemployment Compensation. This will be located in Department of Labor (DOL) screen

ii. SSI/RSDI/WPTY II – This is under the Benefits Issuance Screen in Data Exchange

iii. Child Support – This is in DECSS

In the denial it will list Gross Income along with the gross income limit for the household size. Make sure the household members and their income are correct against the Income Eligibility Standards (9054) and on the (COLA) Cost of Living Adjustment (Administrative Notices).

Deductions are reviewed as follows:

1. Standard Deduction - Make sure it is correct based on number of household members (COLA – Cost of Living Adjustment in the Administrative Notices section of the DSS Policy Manual)

2. Dependent Care Expenses - Check POC (Purchase of Care) screen to make sure it is correct if applicable
   - Go to the application entry screen and scroll down under dependent care expenses
   - In AWW check the Dependent Care Summary. If multiple children are listed, then make sure it is correct for each child
   - Print the Dependent Care Summary screen if applicable
   - Check the Dependent Care Summary screen with the authorization screen listed under Post Eligibility and then childcare authorization for correctness
   - Print the authorization screen if there is a discrepancy and add to the "review documents" folder

Shelter/Utilities are reviewed as follows:

1. The shelter cost is found in AWW under application entry, expenses and shelter cost

2. Make sure the shelter cost matches the application (or change report or recertification), case comments and documentation from DIS

3. Click on the shelter cost and print out the Shelter Cost Details screen, when applicable

4. In AWW check under application entry under utilities the utilities cost

5. Make sure the expenses match the application, case comments and documentation from DIS

6. Click on the utilities cost and print out the Utilities Details screen if applicable

Helpful Tip: Shelter and utility costs are mandatory verifications. Verification of all shelter and utility expenses should be in DIS. If SQCR cannot locate the verification in DIS, an email to the agency may be necessary.

Helpful Tip: In the denial it will list all net income for each household member. Make sure the household members are correct against the Income Eligibility Standards (9054) or the (COLA) Cost of Living Adjust (in the Administrative Notices section of the DSS Policy Manual)

Helpful Tip: If the net income includes a lump sum, this must be verified. A lump sum payment is not a countable resource and must be excluded from the budget. (9059-J) If the lump sum is questionable it should be reviewed under 9033. The lump sum typically comes in SSI income when someone gets a retro-payment, or child support with a back payment. The budget should only include the regular monthly amounts.

7. Complete the Gross or Net Income negative template. Make sure to include the date and description of the actual reason on the Notice and validity of the action. Remember to also review the action for timeliness.

8. Enter findings in SNAP-QCS

6/12 Month Periodic Reports - Administrative Notice A-05-2013 (12/24 Month Certification Periods Periodic Report Processing) - 9085

a. Review the information in the 6 Month Periodic Report and make sure it matches what is in the case record
b. Additional screens need to be printed when reviewing a Periodic Report (12/24 Month)

   1. The 6/12 Month Periodic Report (all pages)
   2. Missing Report Reminder
   3. Notice of Incomplete 6 Month Periodic Report (NIPR)
   4. Certification Period Notice (1st page only w/Non-Sample in upper right corner)

c. Additional screen needs to be printed from the Notices

d. If the Periodic Report was submitted, then it has to be printed showing the date it was date stamped

e. Check to make sure the 6/12 Month Periodic Report is aligned with the certification period. In some instances, the beginning of the certification period may not be on the Certification Notice you pull. Check to see if the certification period is correct, and if unsure check with your supervisor

f. Complete the Periodic Report negative template. Make sure to include the date and description of the action reason on the Notice and the validity of the action

g. Enter findings in SNAP-QCS

Renewals – Administrative Notice A-09-2015 (30 Day Processing of Renewal Applications) – 9043

a. Review the information on the Renewal and make sure it matches what is in the case record

b. Print all comments related to the Renewal

   1. Interview
   2. DOL – Department of Labor Screening
   3. 105 for interview and necessary verifications if listed under letters in AWW or in DIS if sent manually
   4. Notice of Missed Interview if under Notices in AWW or in DIS if sent manually
   5. Pending status form 340 if in AWW or DIS if applicable or in DIS if sent manually

c. Complete the negative Renewal template. Make sure to include the date and description of the action reason on the Notice and validity of the action

d. Enter findings in SNAP-QCS

You are not a citizen – 9007.1, 9036.2

a. Review the information in the application and make sure it matches what is in the case record

b. When a Notice indicates a denial for Citizenship status refer to 9036.2

c. Make sure the application has correct information on it

d. Check to see if the application has a social security number

e. If a social security number is listed check AWW under Data Exchange, this is one way to check to see if the social security number is matched with the Federal Hub

f. Check the case record for a SAVE (Systematic Alien verification for Entitlements form) – This is typically in DIS

g. If there is no SAVE form in the case record, find the INS (Immigration and Naturalization Service – the new name is USCIS) number to send over to the SAVE data base

h. If the client has Form (INS) G-845 it can be used as a secondary form of verification

i. If the client is determined to be lawfully permitted in the US, then the reviewer must determine if the client is an eligible alien (9007.1)

j. If the client reports income, the income is to be deemed if the client is not both a qualified alien, and eligible alien – see earned income section

k. Complete a generic negative template as this is one of the fewer types of denials/terminations. Make sure to include the date and description of the action reason on the Notice and validity of the action

l. Enter findings in SNAP-QCS

Missed Schedules Interview – (9030)

a. Review the information in the application and make sure it matches what is in the case record

b. If the client is not at the office when the application is received, the agency must send a request for an interview. This is typically done on Form 105 or the Verification and Appointment letter found in AWW

c. Print the Verification and Appointment letter from the letters screen in AWW if applicable. The 105 form may be in DIS. If it is in DIS make sure it is printed

d. If the client has missed the interview, the agency must reschedule an additional interview. If this is the case a NOMI (Notice of Missed Interview) will be in the case record. This letter is typically in AWW under the letters screen. If it is not there, check DIS and see if it is in there

e. Complete the Missed Scheduled Interview negative template. Make sure to include the date and description of the action reason on the Notice and validity of the action

f. Go to Q5i section of the manual

Failed to Provide Verification – (9032)

a. Review the information in the application and make sure it matches what is in the case record

b. If the client is not at the office when the application is received, and the agency does not have all the mandatory information needed to support a decision, the agency will typically send a Verification Form or a 105 requesting needed verifications

c. The Verification Form may be in AWW and would need to be printed and put in the case record. If it is not in AWW then it may be in DIS. If it is in DIS make sure it is printed

d. The agency must allow the client a specific period of time prior to denying/terminating the food benefits if the client fails to send in the information

e. If the agency receives the information on the same day as the Notice, the Action and Notice are invalid

f. Complete the Failure to Provide negative template. Make sure to include the date and description of the action reason on the Notice and validity of the action

g. Go to Q5i section of the manual

Loss of Contact with the household – Request for Contact (RFC)

a. This is no longer a valid reason for a denial/termination. If this is listed than it is invalid (action and notice). This may not be seen on a notice at all, but it is listed here as an FYI and just in case.

b. Refer to the flow chart in **"the big rule"** for the procedures for responding to unclear information during the certification period

c. The agency may become aware that someone in the household is no longer in the household and send out an RFC (Request for Contact)

d. Complete a generic negative template as this is one of the fewer types of denials/terminations. Make sure to include the date and description of the action reason on the Notice and validity of the action (should be invalid)

e. Enter findings in SNAP-QCS

Applicant/household deceased

a. Review the information in the case record

b. When an agency receives information that a member of a household is deceased, make sure the source of the information is verified upon receipt

c. Check EVRS – Vital Statistics for the verification

d. Complete a generic negative template as this is one of the fewer types of denials/terminations. Make sure to include the date and description of the action reason on the Notice and validity of the action

e. Enter findings in SNAP-QCS

Not Eligible for Separate Household Status – 9013.1

a. Review the information in the application and make sure it matches what is in the case record

b. There are numerous reasons a client may not be eligible for separate household status, refer to DSS Policy 9013.1

c. Complete a generic negative template as this is one of the fewer types of denials/terminations. Review the information in the application and make sure it matches what is in the case record

d. Enter findings in SNAP-QCS

Not Eligible due to Status of Fleeing Felon – Administrative Notice A-02-2017

a. Review the information in the application/change report/recertification and make sure it matches what is in the case record

b. Review the case record for documentation of Fleeing Felon

c. Refer to Administrative Notice A-02-2017

d. Complete a generic negative template as this is one of the fewer types of denials/terminations. Make sure to include the date and description of the action reason on the Notice and validity of the action

e. Enter findings in SNAP-QCS

If there is no reason listed on the Notice

a. Refer to the eligibility screen (eligibility budget details) to see why the denial/termination occurred

b. This is considered an invalid notice, but the action is still under review. SQCR must determine if the action is valid

c. Once the reason for the action is determined, follow the policy and procedures related to the denial/termination reason listed

d. Complete a generic negative template as this is one of the fewer types of denials/terminations. Make sure to include the date and description of the action reason on the Notice and validity of the action (include timeliness as well)

e. Enter findings in SNAP-QCS

Household Received Food Benefits in another SNAP Household for the Same Time Period

a. Review the information in the application/recertification and make sure it matches what is in the case record

b. Review the case record to see if the client has received food benefits in another case. Review the comments, and any other documentation to see if the client did in fact receive food benefits in another household. Make note of the other case number.

c. In the other case number, review the food benefits issuance screen to verify that the household member(s) received food benefits on the case during the time period in question

d. Print the other case's food benefits issuance screen and add this to the "review documents"

e. View the current case record and make sure the client did not receive food benefits at the same time

f. Complete a generic negative template as this is one of the fewer types of denials/terminations. Make sure to include the date and description of the action reason on the Notice and validity of the action

g. Enter findings in SNAP-QCS

Household Received Food in another State for the Same Time Period

- **a.** Review the information in the application and make sure it matches what is in the case record
- **b.** Review the case record to see if the client has received food benefits in another state. Review the comments, and any other documentation to see if the client did in fact receive food benefits in another state
- **c.** The case record should have documentation and verification stating when the client's food benefits ended in the other state
- **d.** Complete a generic negative template as this is one of the fewer types of denials/terminations. Make sure to include the date and description of the action reason on the Notice and validity of the action
- **e.** Enter findings in SNAP-QCS

Application Withdrawal

a. The client may choose to withdrawal the application at any time

b. When this is the case, it is technically a withdrawal after the certification period (this will be used when entering findings into SNAP-QCS)

c. Complete a generic negative template as this is one of the fewer types of denials/terminations. Make sure to include the date and description of the action reason on the Notice and validity of the action

d. Enter findings in SNAP-QCS

Example of a generic *<u>VALID</u>* template:

SQCR:
Supervisor:

1. Date of Action/Notice: (This is the day the agency sent the Notice)

2. Reason(s) as stated in case file: (This is located on the eligibility Screen)

3. Reason(s) as stated on the Notice: (This is located on the Notice itself)

4. Did the action meet the Procedural requirements (expedite, send NOMI, 30-day processing of applications, etc.)? Explain: Yes, all procedural requirements were met.

5. Did the action taken reflect what was known by the EW? Explain:

Reason for action: (indicate the reason for the action)

Timeliness: (state if the action is timely)

On ***(this is the day of the Notice),*** the agency took action to deny the client's application for food benefits due to ***(this is the reason as stated on the Notice).***

SQCR finds the agency received the information the day after the notice was sent.

SQCR finds the action and notice are valid.

6. Did the EW make a mistake? Explain: No mistakes were made by the agency.

7. Did the notice reflect what the EW thought was happening? Explain: Yes, the notice reflects what the agency thought was happening.

8. Does the notice indicate what happened? Yes, the notice indicates what happened.

9. Was the notice clearly understandable and specific about what was happening? Explain: Yes, the notice was clear.

10. If no notice was sent, was it within the certification guidelines to not send a notice? N/A

11. If Error, Suggested Corrective Action: N/A

Example of a generic *__invalid__* template will look like this:

Number 1-3 on the template will remain the same as on the valid.

4. Did the action meet the Procedural requirements (expedite, send NOMI, 30-day processing of applications, etc.)? Explain: **NO**

5. Did the action taken reflect what was known by the EW? Explain:

Reason for action: (indicate the reason for the action)

Timeliness: (state if the action is timely)

On ***(this is the day of the Notice),*** the agency took action to deny the client's application for food benefits due to ***(this is the reason as stated on the Notice).***

SQCR finds the agency received the information on ________________. This conflicts with the comments and the notice date. The agency received the information on the same day as the Notice.

SQCR finds the action and notice are invalid.

6. Did the EW make a mistake? Explain: Yes

7. Did the notice reflect what the agency thought was happening? Explain: No, the comments state the agency received the information on ______________. It is date stamped on ______________.

8. Does the notice indicate what happened? Yes, the notice indicates what happened. (When answering this question keep in mind that the notice has a reason for the action a majority of the time. Even if it is the incorrect reason, you will very rarely change this response on the templates).

9. Was the notice clearly understandable and specific about what was happening? Explain: No. The notice is confusing to the client, as the client submitted the needed information on the same day the Notice was sent.

10. If no notice was sent, was it within the certification guidelines to not send a notice? N/A

11. If Error, Suggested Corrective Action: (In this section site the policy and procedures the agency failed to follow): SQCR recommends the agency review policy and procedures on application processing and clear/understandable notices.

Helpful Tip: Save a copy of the completed template/write-up for future reference. All templates are on the F: drive > EPQC > QC > > Program Specialist FB_Forms_Training_Policy >Negative Templates.

Entering into SNAP-QCS:

- It is very helpful to use the yellow page to enter the demographic information into SNAP-QCS such as the client's full name, phone number and address

- Only enter an element code and nature code of the action and/or notice is invalid (these codes can be found in Chapter 13 of the FNS 310 Manual in Appendix D

- Make note of the element and nature codes to help with completing the findings form for those reviews with errors

Completing the Findings Form:

- Enter the date
- Enter the Area which can be found using the spreadsheet with all of the Area's and Team's listed (found on F: drive > EPQC > QC > Program Specialist FB_Forms_Training_Policy > Agency Contacts-DSS-DMMA rev 8-6-19)
- Enter the client's full name (this can be found on the yellow sheet) by last name, first name middle initial
- Enter the case number (also on the yellow sheet)
- Enter the team number (on the yellow sheet)
- Enter the review number (this is the QC review number; it can be found on the yellow sheet)
- Enter the review month (enter month as m-yyyy)
- Enter SQCR name (first name then last name)
- Pick supervisor from the dropdown menu

HELPFUL TIP: Save a blank copy of the findings form with your name and supervisor already saved on it so you will not have to complete this step each time)

- Pick the review type by double-clicking and moving the correct review type up to the top (food benefit denial or termination)
- Pick the Finding by double-clicking and moving the correct fining to the top (Valid Denial, Invalid Denial, Valid Termination, Invalid Termination)
- When completing a finding form for negatives, there is no need to enter any information in the FB Amount or Error Amount
- Enter the policy used to make a determination along with the name of the policy (Example: 9006.2 – Adequate Notice); any Administrative Notice used is also placed in the DSSM block as well
- Enter the Element Code(s) & Responsibility (Example 371 – Combined Gross Income & 031 – Incorrect limit applied)
- Enter the explanation portion of the write up. Be sure to include the response to #11 on the findings form as well. An example of what goes into the findings form:

On 7/21/2020, the agency took action to deny the food benefit application due to being over the gross income limit.

On 7/14/2020, the agency received an application for food benefits for a household of 2 with DOL completed on 7/16/2020, and screening completed on 7/14/2020 and determined ineligible for expedited services.

On 7/16/2020, an Appointment and Request for Verification Letter was sent requesting an interview scheduled for 7/27/2020 at 8:30am, along with all mandatory verifications.

SQCR finds an interview was completed on 7/17/2020. A 105 was sent requesting shelter verification, along with household member Lincoln's social security number, due by 7/27/2020. Wages were received on 7/17/2020 as well for household member Lorraine from employer Nemours.

On 7/20/2020, the agency received verification of shelter expenses of $300 which includes the utilities.

SQCR finds the agency calculated gross income as follows:

6/26/20 $1,041.50

7/10/20 $1,627.40

Total: $2,668.90 / 2 biweekly paystubs = $1,334.45 x 2.16 = $2,882.41 total gross income.

SQCR finds the gross income of $2,882.41 is greater than the gross income limit for a household of 2 of $2,818. SQCR finds the agency used a gross income limit of $2,820.

SQCR finds the action and notice are invalid.

SQCR recommends the agency review policy and procedure on income eligibility standards, cost of living adjustments, along with clear/understandable notices.

- You will need to save the completed findings form in the Findings Form folder for the review you are working on
- It will need to be converted to a pdf file
- Save the file as follows: QC# month – year Error Finding area team
    - (example: 20982027 6-20 Error Finding Area 2 Team 135)

The final step is to create a combined file of all of the documents used for the review as follows:

1. *Yellow page (sample sheet)*

2. *Notice (if no notice, use the Eligibility budget details screen)*

3. *Notice Summary*

4. *Items from AWW that support decision (all of the documents from the "review documents" folder)*

5. *DSS Case File Information (all documents in the DIS folder)*

6. *Findings Form, if applicable*