Welcome To...

QC PI'S

BROUGHT TO YOU BY: THE BEST OF THE WEST

WHAT IS A QC PI?

The PI is submitted on the CF24 form by counties who have questions relating to Quality Control.

Q = Quality

C = Control

P = Policy

I = Interpretation

WHAT PI'S ARE WE SERVING TODAY?

1. 18-51 STATEMENT OF FACTS
2. 18-52 SSA GROSS INCOME AND OVERPAYMENT REDUCTION
3. 18-84 SSA: GROSS OR NET?
4. 18-89 FRAUD UNVERIFIED EARNINGS

PI 18-51 - STATEMENT OF FACTS

Question:

Signed SAWS1 application for CalFresh received by county and accepted as single signature application. County worker completed interactive interview with client and completes all applicable screens in CalWIN based on the information gathered from the client at the time of the interview. County worker fails to print the statement of facts at the time the interactive interview is completed (at the time some workers were under the impression that the SAWS1, the initial application for CalFresh only households, was the only thing that needed to be printed as no signature was needed on the Statement of Facts). QC is not able to get a printed Statement of Facts. Question is, how should QC proceed at this time if we are not able to get a printed Statement of Facts? Transmittal 09-04 states that Statement of Facts is to be filed with the active case.

PI 18-51 - STATEMENT OF FACTS

Requestor's Proposed Answer:

Complete QC review as any other active case (Comp I and Comp II). Attach CalWIN print outs showing information gathered during the interactive application interview and case comments from county worker for the interactive interview.

State Policy Response:

State agrees with the requestor's response. Furthermore to the above response, the analysis of the case record narrative must address the following:

1. SAWS1 was used as a single signature application per ACL 15-84.
2. The system does not allow QC to re-print Statement of Facts.
3. Identify and label each screen print-out by element.
4. How the eligibility worker determined eligibility for each element, per Section 323.3 of the FNS310 Handbook.

LET'S DIGEST: EXAMPLE

Element 311

CR: Based on a review of the case record and the agency's case comments, Mrs. Sweetie reported no earned income. The SAWSI application was used as a single signature application, per ACL 15-84. QC was not able to reprint a copy of the Statement of Facts; however, in the context of the overall case record was able to determine the facts of the household. The agency correctly budgeted $0 for wages.

FF: Mrs. Sweetie reported no earned income for the sample month. Per the IEVS report, QC found no evidence to the contrary. Comp 1 = $0.

PI 18-52 - SSA GROSS INCOME AND OVERPAYMENT REDUCTION

Question:

63-502.12 states that income shall not include; "Monies withheld from an assistance payment, earned income, or other income source, or monies received from any income source which are voluntarily or involuntarily returned, to repay a prior overpayment received from that income source, provided that the overpayment was not excludable under Section 63-502.2, or due to the household's failure to comply as specified in Section 63-502.17." Based on ACIN 1-16-03, the amount of the pension to be counted is the net, the offset amount would not count as income in the CalFresh budget.

Example: Customer's SSA benefit is $1,000 per month. There is a $100 overpayment reduction by SSA, so the customer receives $900. There is no information in the case record to indicate why, but the County uses $900 to determine benefits. QC contacts SSA and is informed that the overpayment was caused by the customer not reporting employment income when receiving disability based SSA; so per SSA, it was caused by not complying with SSA program requirements. Is the County required to verify that the overpayment is not due to failure to comply? Will QC use $1,000 or $900 on Comp I and II?

PI 18-52 - SSA GROSS INCOME AND OVERPAYMENT REDUCTION

Requestor's Proposed Answer:

1. As the County has not verified the SSA overpayment was not due to failure to comply with SSA program requirements, or documented why they are using the lesser amount, QC should use $1,000 on Comp I and II.
2. The County should use the net income and count $900 in the budget to calculate the amount of benefits the household is eligible to.

PI 18-52 - SSA GROSS INCOME AND OVERPAYMENT REDUCTION

State Policy Response:

State agrees with proposed answer #2. For QC purposes, it is not required to verify if the reason for the overpayment is due to failure to comply with the Social Security Disability (RSDI) program requirements. Section 63-502.17 only applies to means-tested programs. Since RSDI is a non-means tested unearned income program this section does not apply in this scenario. As a reminder, QC is responsible to verify all unearned income including the reason for the lower RSDI payment (e.g. Medicare premium deduction, child support deduction, etc.)

In this scenario, the $100 recoupment is from RSDI, that is a non-means tested unearned income benefit. As a result, the overpayment, in this case, must be disregarded as income when determining CalFresh benefit amounts, per CFR 273.9(b)(5) and M.P.P. 63-502.121. Therefore, the net income of $900 should be counted in Comp I and Comp II; if required to proceed to Comp II.

PI 18-84 - SSA: GROSS OR NET?

Question:

We have a situation (NACF) where the HH is mom and 2 children; the children receive SSA based on the absent parent's (AP) retirement benefits. There is an OP and the children receive $640. The gross approved amount is $740. We can't find regulations to support the use of gross or net to determine the CF benefit allotment when it comes to social security benefits. Do we apply the same process as we would for UIB/DIB/RSDI? Please note, the OP is based on the action or inaction by the Dad/AP.

PI 18-84 - SSA: GROSS OR NET?

Requestor's Proposed Answer:

Our proposed answer is to use the net as this is an offset due to an overpayment.

State Policy Response:

State agrees with the proposed answer. In this scenario, the net income of $640 must be used to determine the CalFresh benefit allotment since the SSA benefit paid to the children is from the absent parent's Retirement, Survivor's, Disability Insurance (RSDI) benefit. The overpayment must be disregarded as income when determining CalFresh benefit amounts per CFR 273.9(b)(5) and M.P.P. 63-502.121.

LET'S SHARE A PIECE

In the state of Massachusetts, it was discovered that the eligibility workers were counting the gross amount and not the net amount for cases similar to the ones discussed.

To prevent an under issuance to our clients please share this information with the eligibility workers as a reminder.

PI 18-89: FRAUD - UNVERIFIED EARNINGS

Question:

Case was dropped for unverified earned income. The customer worked "for a friend of a friend." The information can not be verified as this time. QC closed the case as code 3 – incomplete. We/QC are doing a fraud referral. If fraud determines there is no fraud or there are no findings, can QC determine the customer has cooperated?

Requestor's Proposed Answer:

If there are no findings and the fraud investigators informs QC of no issues found, QC can say the customer has co-op and lift the QC sanction.

PI 18-89: FRAUD - UNVERIFIED EARNINGS

State Policy Response:

The customer's refusal to cooperate in providing verification of income caused their case to be terminated. In order for the QC sanction to be lifted, the reason that caused the termination action must first be corrected; meaning, the customer subsequently cooperated. Should fraud investigation determine no issues found, QC should not assume customer cooperation. Before the sanction can be lifted, the fraud investigation report should specifically indicate that the customer had subsequently cooperated in providing verification of income, per M.P.P 63-505.13.

As a reminder per Section 442.2 of the FNS 310, "The reviewer shall not, however, report the case to the State for termination when it is determined that the household failed, rather than refused, to cooperate." For QC purposes, the reviewer must clearly indicate in their case narrative the distinction.

WE HOPE YOU ENJOYED OUR QC PI'S !

Any Questions ???