INCOME AMOUNTS FOR COMPS I & II

DATE: August 30, 2006

SITUATION:

This is a May 2006 QR/PB case in the April/May/June payment quarter. In 4/06, the client made a mid-quarter report that her job ended in 3/06. The client received two checks in 4/06 and provided verification on 5/1/06. The client had no actual earnings in May or June. On 5/1/06, the CWD supplemented CW for 4/06 and 5/06; however, the CWD did not supplement FS. Since decreased income was reported in 4/06, the CWD should have re-averaged earnings for April, May, and June, spreading out the 4/06 earnings over the quarter. So under QR/PB regulations, one third of the 4/06 earnings should have been used in figuring the 5/06 FS benefits. That is the earnings used in Comp II.

QUESTION:

For Comp I, should we use the actual 5/06 earnings of zero, or one third of the 4/06 earnings actually received in 4/06 and averaged over the quarter? Section 621.1 of the FNS 310 tells us to use actual verified income in Comp I, including relevant annualized or prorated amounts and converting when appropriate. It does not mention income averaged over a guarter.

RESPONSE:

Use the actual income received in the Sample Month because "income averaged over the quarter" is not one of the options allowed in the computation. FNS concurrence received 08/30/06.