

IMPOSING QC SANCTIONS AT THE END OF THE FEDERAL REVIEW PERIOD

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Note: The following incorporates situations and questions received from two counties involving the imposition of household non-cooperation with a Quality Control Review. Since both inquiries involve this topic, they have been combined into a single document. Additionally, because of county concerns, the scenarios have been modified to reflect situations occurring at the end of the Federal review period/Fiscal Year (FFY.) The answers below apply to both scenarios so are not produced separately under each situation as would usually be the case.

Scenario #1

The GR/FS case is approved for benefits effective March 2006. The case is selected for a QC review in August 2006, (in the 2006 FFY). This is the last month this case was active because it was changed to a PAFS case effective September. The household refuses to cooperate with the QC reviewer in October 2006, which is in the 2007 FFY.

Scenario #2

The Sample Month is September. The household consists of a Grandmother and three children. The Grandmother (the only person who can provide household information) refuses to cooperate with the QC reviewer in November (the next FFY.) Subsequent to the refusal, Grandmother is replaced by the Mother as head of household.

Question #1:

Is the determination of refusal to cooperate case-based or household-based?

Response:

Per FNS E-Mail Correspondence:

Once the determination of refusal to cooperate is made, it stays with the household. However, if the household composition change brings in a new member who is in a position to cooperate and who does so, the sanction is then lifted.

Question #2:

Do the sanctions follow the household and Grandmother respectively or stay with the original cases?

Response:

See response to Question #1 above.

Question #3:

If these cases have August or September Sample Months (thereby creating the non-cooperation in the next FFY), is the determination of which FFY to add the 95 days based on the Sample Month (FFY 2006) or actual date of occurrence (FFY 2007)?

Response:

Any sanction that is imposed ends 95 days from the end of the FFY containing the Sample Month. Therefore, in these scenarios, the sanctions would end in January 2007, NOT January 2008.