

EES POLICY NO. 23-06-06	RE: Periodic Report Procedures to Recertify Household Waiver
Policy Memo	Contact Persons: Sarah van Straaten
From: Carla Whiteside-Hicks, Interim EES Director	KEESM Reference:
Date: June 08, 2023	Other:
Primary DCF Areas Affected: Food Assistance	Where Posted on Web: http://content.dcf.ks.gov/ees/KEESM/Policy_Memo/policy_memo_list.htm

USDA FNS has approved a waiver to allow DCF to process Food Assistance Reviews processed on or after May 01, 2023, through April 30, 2024, using periodic report procedures with a few mandatory expectations.

Any Food Assistance Review processed on or after May 01, 2023, through April 30, 2024, will be processed using periodic report procedures per KEESM 9122.6 #1. This means that Review applications will be processed using the same process as an Interim Report. No interview will be required, and Interim Report processing procedures will be used to recertify households.

REMINDER: Elderly and Disabled Review with no earned income and no reported changes will follow normal processes as interviews are already waived for this population.

With the approval of this waiver the following expectations are mandated:

- The State may not waive the verbal explanation of work requirements for the households with members subject to Mandatory E&T Program.
- Reviews filed after end of certification period, but within 30 days of closure must follow normal processing procedure.
- Written Consolidated Work Requirements notice must be sent to all households subject to the general work requirements, ABAWD work requirements, and/or mandatory E&T.
- Screen for exemptions from general work requirements and ABAWD work requirements including if is appropriate to refer individual to E&T.
- Screen for exemptions from student criteria.
- Written explanation of simplified reporting requirements.

- If the household requests an interview an interview must be conducted with household.
- Any unclear information that was held until Review, must be acted on.

Per BPM procedures an interview template will be completed as normal for the Food Assistance Review to document the work that is done to determine eligibility (who, what, where, when, why) and include the following statement in Narrative Section of template:

- “Periodic Report procedures used to establish new certification period”

To meet the mandated expectations of this waiver the workers must follow the below guidance:

- Screen and determine if any household member(s) are exempt from general work requirements and/or ABAWD work requirements. If exempt document why and update KEES appropriately for ABAWD time limits.
- Screen and determine if any household member(s) are mandatory, exempt or not a good fit for the Mandatory E&T Program and document why on template. (Reminder: if not a good fit, worker will need to void system generated referral task)
 - If a member(s) is mandatory to participate in E&T program verbal explanation must be provided. Worker will need to contact client to provide verbal explanation of work requirements using normal procedure to discuss Consolidated Work Requirement notice and document on template using normal procedures. If attempt to discuss is unsuccessful, include following statement in Narrative Section of template:
 - “Verbal explanation of work requirements offered to client unsuccessful”
 - If worker contacts clients for any other reason verbal explanation of the work requirements must be provided. Worker will need to follow normal procedure to discuss Consolidated Work Requirement notice and document on template using normal procedures.
- Screen and determine if any household member(s) are exempt from student criteria, document, and update KEES accordingly.

The interview is being waived, but a customer schedule must be created to process the review. Add customer schedule with review type and attendance of complete.

If further verification is needed to process review a 10-day request will be sent. (**DO NOT** use F847 as system will not discontinue a review)

If a review application is received and only information provided is name, address, and signature this is not enough information to process using periodic reporting procedures. An interview will be required for these households.

Examples:

1. FA Review received 05/05/2023 for June 2023 benefits. Worker reviews recertification application and client has completed questions and deems that periodic report procedures can be used to process. Customer schedule is created with Review type and attendance of complete. Worker completes interview template, and no changes are reported, but worker notices that client is an ABAWD and not meeting ABAWD criteria and would be mandatory to participate in E&T. Worker contacts client to provide verbal explanation of Consolidated Work Requirements. During discussion, client discloses that they are applying for SSI due to a diagnosis of schizophrenia and anxiety which limits their ability to work. Pending application for SSA disability will exempt client from ABAWD criteria and mandatory E&T. Worker checks EATSS and is able to verify that client has “early input” and this can be used to verify exemption. Workers adds medical condition of “Incapacity – Verifiable and at Least 30 Day” and processes case.
2. FA Review received 05/10/2023 for June benefits. Worker reviews recertification application and client has completed questions and deems that periodic report procedure can be used to process. Customer schedule is created for Review type with attendance of complete. Worker completes interview template, and no changes are reported, but notices that there are prior quarter earnings from Imperial Garden that was not reported on review and is not currently being used in budget. Worker screens case for ABAWD and mandatory E&T requirements and exempts from both due to child in the home. Collateral contact is unsuccessful. Request for information is sent requesting last 30 days paystubs from Imperial Garden and Review is pending.
 - Information is provided and income is added for FA starting 06/01/2023, EDBC is ran with reason of Review and NOA sent.
 - Information is not provided. Update verifications page and add non-compliance record. Run EDBC for June with run reason of Review and discontinue FA for failure to provide.
3. FA/AF Review received 06/12/2023 for July benefits. Worker reviews recertification application and client has completed questions and deems that periodic report procedures can be used to process FA and interview can be waived for AF as it is not required. Customer schedule is created for review type with attendance of complete for FA and a separate customer schedule is created for review type with attendance of exempt for AF. Interview template is completed, and it is found during the process that client reported new employment at Taco Bell with a start date of 05/29/2023. Collateral contact made to Taco Bell to verify employment is unsuccessful. Request for information is sent requesting last 30 days paystubs from Taco Bell (or Employment Verification Form, if 30 days not available at time of processing). Review is pending.
 - Information is provided and income is added for FA/AF starting 07/01/2023, EDBC is ran with reason of Review and NOA sent.

- Information is not provided. Update verification page and add non-compliance record. Run EDBC for July with run reason of Review and discontinue AF/FA for failure to provide.
4. FA Review received 06/09/2023 for July benefits. Worker reviews recertification application and client has completed questions and deems that periodic report procedures can be used to recertify household. Customer schedule is created for Review type with attendance of complete. Interview template is completed and during the processing of the recertification application worker notices that income from Sears is being budgeted, but applicant did not report any income on recertification application. Worker determines that client is an ABAWD and must participate in E&T program. Collateral contact is made to Sears but is unsuccessful. Worker contacts client and client verifies that Sears store closed in April 2023, and they received their last check on 05/12/2023. Client is able to email over letter from Sears that employee received about closure and copy of last check. Prudent person is used to determine check provided is last check. Worker verbally explains Consolidated Work Requirement notice and during discussion client reports that she is looking for work and has applied for unemployment. Pending application with unemployment exempts client from ABAWD criteria and mandatory E&T program. System check verifies that client has a pending unemployment application. Worker updates time limit page to exempt for unemployment and documents exemption on template. No further information is needed, and case is processed for July benefits.
 5. FA Review received 05/24/2023 for June benefits. Worker reviews recertification application and client has completed questions and deems that periodic report procedures can be used to recertify household. Customer schedule is created for Review type with attendance of complete. Interview template is completed, no changes reported, and no income currently being budgeted. Worker also determines that client is an ABAWD with no potential reasons reported on application for exemption and is mandatory for E&T program. Worker contacts client to provide verbal explanation of Consolidated Work Requirements and call is unsuccessful. ABAWD time limit page is updated, and case is processed. Worker journals in Narrative Section of template that “Verbal explanation of work requirements offered to client unsuccessful”. Referral is generated by KEES for E&T program.
 6. FA Review received 06/07/2023 for July benefits. Worker review recertification application and client has completed questions and deems that periodic report procedures can be used to recertify household. Customer schedule is created for Review type with attendance of complete. Interview template is completed, and worker finds that client is reporting work limitations due to depression, ADHD and anxiety, no income and no income being budgeted. Worker determines that client is an ABAWD and mandatory to participate in E&T program, but disclosure of work limitations reasons potentially could exempt client from both. Worker contacts client to provide verbal explanation of

Consolidated Work Requirements, but call is unsuccessful. EATSS shows no pending application for disability, KEES has no approval for presumptive disability as either Tier 1 or MediKan and there is no reasonable evidence in the case file that supports this exemption. Workers documents “Verbal explanation of work requirements offered to client unsuccessful” and sends request for information requesting ES-4309 be completed and returned within 10 days.

- If information is received and ES-4309 verifies limitations on work, add record on medical conditions page of “Incapacity – Verifiable and at Least 30 Day” and process case. This will exempt client from ABAWD and mandatory E&T program.
- If information is not received or ES-4309 does not verify limitations on work, time limit page will be updated accordingly, worker will use prudent person to determine if client is a good fit for E&T and case will be processed.

7. FA Review received 05/03/2023 for June benefits. Worker reviews recertification application and client has completed questions and deems that periodic report procedures can be used to recertify household. Customer schedule is created for Review type with attendance of complete. Interview template is completed, and worker finds that client is 20 years old reporting attending WSU full-time starting January 2023, no children in the home and no income. Client must meet student criteria and since Review was submitted on or before June 30, 2023, recertification can be processed using COVID-19 temporary student exemptions. Worker contacts client to discuss student criteria and verifies with client that they are not working, do not participate in Work Study, but do have an expected family contribution of 0 in the current academic year. Client is able to email over documentation of this and case is processed allowing for student exemption.
8. FA Review received 07/05/2023 for August benefits. Worker reviews recertification application and client has completed questions and deems that periodic report procedures can be used to recertify household. Customer schedule is created for Review type with attendance of complete. Interview template is completed, and worker finds that client is 19 years old reporting attending FHSU full-time starting January 2023, no children in home and no income. Client must meet student criteria and since Review was submitted on or after July 1, 2023, COVID-19 temporary student expirations have expired, and client must meet student criteria per KEESM 2531. Client is currently not meeting student criteria and case would be processed and discontinued.
9. FA Review received 06/05/2023 for July benefits. Worker reviews recertification application and notices that client did not answer any questions and only provided name, address, and signature. Worker deems that periodic report procedure cannot be used and contacts client to complete phone interview. Call attempt is unsuccessful. Customer schedule is created with Review type and attendance as scheduled and interview NOA sent.