Work First (WF)

- 1 Regarding the Past Paid Public Assistance (PPPA) form, is it required to send the form back to Child Support Services in a paper format? Work First policy does not determine the method the information is submitted to Child Support Services. This submission should follow specific county processes and must be submitted through a secure method.
- 2 Why is the Work First Cash Assistance (WFCA) payment divided by the number of children in the home before adding that amount to the DSS-4746? When child support orders are issued from child support services they are specific to a child. Therefore, when the DSS-4746 form for past paid public assistance is requested the history is needed per child.
- **3** When the parent is included on the case should the amount of PPPA be divided by the number of children and the parent? For example: Mom and son receive \$236 monthly. For April 2025 payment is the \$236 divided by 2 or is the absent dad required to cover \$236 to the state?

The assignment of rights to child support are specific to the child on the case and does not include the adult included on the case. When the case manager receives the request for the Past Paid Public Assistance form to be completed the monthly payment amount would be divided by the number of child(ren) in the Work First Cash Assistance case.

4 If the client declines the Learning Needs Screening Tool (DSS-5327) and signs the waiver (DSS-5330), do we need to include the DSS-5327 (child only/parent and child/2-parent and child)?

Work First policy outlines the Learning Needs Screening Tool is to be offered to each participant, child only and Work First Benefit cases. Case managers must utilize the Learning Needs Screening Tool Waiver (DSS-5330) to document the participants' preference. If the assessment is not conducted policy does not indicate the DSS-5327 must be included in the case file. (WF Manual Section 117 I. E. 4.)

5 If a child only case, does the DSS 8218 and DSS-8218-A need to be completed? The substance use screening and testing requirement does not apply when: there is a non-parent caretaker as the case head, or for dependent child(ren), or to recipients of Supplemental Security Income (including custodial parents). If the case is subject to substance use screening and testing requirements then the case manager must give each applicant/participant, the Substance Use Screening Notice (DSS-8218-A) and conduct the AUDIT/DAST -10 (DSS-8218). (WF Manual Section 104B II.)

6 The DSS-8109 is no longer used, can't be found on the Income Support or PDC. Can we use the DSS-8146 to schedule appointment for interviews (recertifications and applications) and also to request missing information to complete application/recertifications?

Policy outlines the use of the Appointment Notice (DSS-8189) for the appointment time for recertifications. This form also includes a list of items for the case manager to indicate are needed to complete the recertification. The Notice of Information Needed to Determine your Eligibility for Work First Family Assistance (DSS – 8146 A) should be used to request information for applications and recertifications, as needed (WF Manual Section 104. I. K.3. and WF Manual Section 201 I. B)

7 Are other counties having issues with the Social Security office using Work First Cash Assistance income support numbers to reapp on for their Medical Assistance cases?

When this happens, it is over-riding our cases causing us to have to close our current WFCA case and then re-key. Is there anything that can be done about this?

Yes, this circumstance is being experienced across the state. The guidance which is being provided is for county staff to close the current case with the last date of the month and key a new application with a start date of the first of the following month. Document clearly when this occurs for monitoring purposes.

8 NC FAST will not allow the release of a payment that has been on hold for 3 months or more, they can be canceled but not released. Could a report be generated for payments on hold for 2 months or more?

On hold payments must be released or canceled within 2 months of payment generation. If it is determined that a participant is eligible for a payment that has been on hold for over 2 months a HD ticket should be submitted.

Food and Nutrition Services

- 1 Children under age 18 are automatically eligible to receive, however once that child turns 18 or older, would case manager revisit to determine child 18 or older citizenship status? Or, reevaluate 40 qualifying quarters of their parent or spouse to determine eligibility? The statement in your question "Children under age 18 are automatically eligible to receive" is not supported by policy. There is a misconception that all children under the age of 18 are automatically eligible regardless of their status. This is not true. The child must either fall under one of the four categories in FNS 227.05 to exempt them from the qualified status process, or they must be a qualified non-citizen. If your question refers to a gualified child, i.e. an LPR child that is exempt from the waiting period due to being under the age of 18, then yes once that child turns 18 you would review their non-citizen eligibility. Remember, SAVE should be requested at every application/recertification for non-citizen clients. You will need to reevaluate to determine if the client meets any other criteria to be exempt from the waiting period, or if at that point if they have met the 5-year waiting period. If not, yes you could use parent's guarters to meet 40 gualifying guarters. However, per FNS 227.10 you could only use guarters worked prior to the individual's 18th birthday.
- Is this 10 years and or 5 years for non-citizens for using the 40 qualifying quarters.
 1 quarter equals 3 months. There are 4 quarters in a year. 40 qualifying quarters is 10 years.
- 3 For clients who are ineligible due to not providing sponsor income/resources. How do we make them ineligible in NC FAST? The option to add an ineligibility period is not available and leaving sponsor evidence unverified does not work. Please submit a help desk ticket for this NCFAST functionality issue the next time this situation arises.
- 4 Does a client being deemed disabled/blind or is receiving disability through SSA exempt them from sponsor deeming? Please refer to Listserv message #2025-51 sent 4/1/25 as this discusses when sponsors obligations end. FNS 227.09 B. lists the clients that are exempt from the sponsored non-citizen requirement, being deemed disabled does not show as an exemption reason.
- **5** How would a parolee/not approved for work authorization prove SSN enumeration if they are not eligible to receive a SSN until being work authorized?

Agencies should follow FNS 230.07 to refer a client to SSA for enumeration. This link <u>Types of Social Security Cards | SSA</u> from SSA.gov discusses the 3 instances when a client is assigned an SSN. One option is "not valid for employment" when an SSN is needed because of a federal law requiring an SSN to get a benefit or service. Since enumeration is an FNS requirement, clients can be assigned SSN even if they are not eligible for work.

6 Can we get more clarification on who can be considered homeless? For example, a person living place to place at each recertification every six months. Can they claim this exemption at each review?

Per FNS 260.01 E. 4. C. "Homeless means an individual who lacks a fixed and regular nighttime residence or an individual whose primary nighttime residence is: ... A temporary accommodation for not more than 90 days in the residence of another individual" which fits your scenario for an ABAWD exemption purpose. When the client reports homelessness, per FNS 260.01 I. client statement should be accepted unless questionable. If it is determined the client statement is questionable, clear documentation should be added to include how you came to that determination.

- 7 Was there a communication regarding not using SAVE outside of NC FAST? This would be an individual county decision based on costs incurred. County staff should consult with leadership regarding county specific practices. FNS policy does not outline SAVE must be run solely through NC FAST.
- 8 Do undocumented clients have to apply for SSN to receive FNS benefits? Undocumented clients are not eligible to participate in the FNS program.
- 9 Are Cuban Haitian entrants (CHE) who enter the US illegally/unlawfully but later obtain a status of pending asylum are they eligible? Yes, per slide 13 in the non-citizen PowerPoint CHE's with an application for asylum pending are eligible without a waiting period provided all other eligibility criteria are met. Instituting additional verification on SAVE for CHE will verify their status.
- **10** Is a client who has a Cuban/Haitian status and SAVE reflects pending status adjusted to eligible?

The agency should institute additional verification on SAVE for CHE to determine if the client is considered a Cuban Haitian Entrant. If this does not clear the client's non-citizen status, a completed DSS 9000 should be sent to <u>dss.policy.questions@dhhs.nc.gov</u> so the specific case can be reviewed.

11 If you remove the expedite indicator on the 7th day due to the applicant not completing their interview or providing ID, if they complete the interview or provide their ID on that same day, when trying to place the indicator back on the case, NC FAST will not allow you to use the same date of discovery. Is it acceptable to use an alternate date of discovery for processing purposes?

HSBIA FNS Business suggests the Date of Discovery should be changed to the Date of Application, since the interview was completed and/or ID verified within the seventh day of the application with proper documentation.

If the client does not interview and/or provide identity by the 7th day they lose their right to expedite services. If the application was originally pending as non-expedite but becomes expedite after verification of income and expenses are received, then the job aid should be followed to aid the date of discovery for when the agency became aware of the change

in status. If the system is not functioning as designed based on the job aid, then a NCFAST Help Desk ticket should be submitted.

12 Can we get a clear statement in policy for clarifying which employment needs to be verified if terminated at recertification. All jobs on ESC/Newhire? Jobs counted in case only? Jobs ended where income could go into new CP? It's difficult to be consistent without an obvious instruction for recertifications. Applications are easy if they are not in base period there is no issue.

This request will be sent to Division of Child and Family Wellbeing (DCFW).

- **13** The Alien Worksheet (DSS 8239) is outdated. Thank you for this information. DCFW will be notified.
- **14** Can the Referral for Social Security Number Application (DSS 8174) be translated to Spanish?

Thank you for this suggestion. DCFW will be notified.

- **15** COFA immigrants and the temporary process change with NCFAST to make individuals eligible, need updated guidance on this process. DCFW will be notified to request an update.
- **16** For SAVE, if naturalized and SOLQIC still shows code "B" do we still need to run SAVE? SAVE should be requested on every application and recertification for any non-citizen client.
- **17** Where do caseworkers sign up for terminal messages and listserv messages? The most recent guidance is in Listserv Message #2022-195 December 1, 2022.
- **18** Can we get clarification on policy 310.06 A.2. Example from policy says the individual lost their job during the month of application or recertification. The individual was paid every 2 weeks and received a full months pay. Week 1 \$423.15 (full) Week 2: \$315.27 (full) Pay period amount: \$423.15+\$315.27=\$738.42/2 = \$369.21 Application month calculation: \$369.21 X 2.15 = \$793.80. Do both pays have to be representative in the month of application to convert or do we use actual?

FNS 310.06 A. states "Individual will receive a full month of income during the month of application or recertification." It would need to be a full month of income to convert.

19 If a client has already provided proof of rent or residency with a lease, but the case is denied during the lease term, do we need to request verification again, or can we use what we already have received?

If the lease is unexpired and the amount has not changed, the verification in the agency records can be used.

20 If the recertification comes in without the minimum requirements, such as full name and address, can we call to verify that information like a telephone signature, or does it go back to the client per FNS 505.03 B?

The DSS 2435 prints with the client's name and address already included on the 1st page of the form. If this page is included with the signature page that contains the client's signature, this is enough to be considered a filed recertification.

- **21** Policy 315.31 A. & B. states that if an SSI check is reduced due to a client responsible overpayment we count gross, but then part B. states if DSS is not successful in obtaining cooperation from SSA in verifying, then we count net. How are we supposed to count SSA? Please refer to FNS policy section 305.01 F, there are two examples included in policy that cover this situation.
- 22 If expedited status is discovered later, will the case show overdue on the timely report?

If your question is about a non-expedited case becoming expedited, i.e. change or verified income and expenses, as long as the date of discovery is properly recorded it will adjust accordingly. Please refer to the job aid "FNS – Expedited Applications."

- 23 Alerts from BEER reports noted on a Medicaid case that was active, individual applies for FNS and caseworker did not research other cases in the agency. Is this considered an Agency Error since it was known to the agency? BEER Report is for income in the past. The only time an overpayment would occur at application is if the client was still employed. If you have a case specific question, please submit to dss.pi.guestions@dhhs.nc.gov.
- 24 Will cases that were extended for/during Hurricane Helene go back to their "normal" certification period (CP)?

Yes, per DCDL 23-2024 sent October 14, 2024, the cases which were extended at that time were only extended for six months.

- **25** Should difficulty/hardship of care payments be counted as income? Difficulty of Care payments the client receives under the Medicaid waiver program are countable as income in determining eligibility for FNS benefits. The income the client receives is recognized in the federal regulation definition of FNS income.
- **26** Can you take a look into problems that are caused by ePass incorrectly auto filling client's recertification information into NC FAST? Submit a Help Desk ticket.
- **27** Is it required to update SUA evidence? Does the system auto update SUA evidence? Yes, SUA evidence must be updated as the system does not update this evidence.
- 28 If the DSS-8650 expires on the last working day of the month, can we close the case after 5pm (for timely recertifications)? No, the recipient must be given 10 calendar days to provide the requested information (FNS policy section 510.01 C3). Staff must send the DSS-8650 timely enough to allow the 10 days to expire prior to the deadline.
- **29** Is BUA evidence entered twice? Example: Client pays water and phone, will BUA amount be entered once or twice?

No, the evidence is entered only once.

- **30** If client reports a change in self-employment, can the case be reassessed? Changes reported directly to the FNS worker by the FNS unit must be reacted to as stated in FNS policy section 515.01 A. However, if the change meets the criteria listed in FNS policy section 515.01 B, you would not react to it.
- 31 Is there a collateral contact form for FNS? No

32 What evidence should be entered if client is participating in E&T program?

It would depend on what the client is doing in the E&T program to meet requirements, i.e. if the client is completing volunteer work, there is volunteer work evidence that would be entered.

33 Is voter registration evidence only for case head?

Per guidance provided by the compliance officer, voter registration evidence should be entered for the case head as well as anyone else in the household who is a US citizen and over age 16 where contact is made and a covered transaction was completed.

34 If documented client have not been to court, can they still receive if documents expired?

You must run SAVE and evaluate their eligibility based on the response.

- **35** Are pending asylum applicants eligible for FNS? Per FNS policy section 227.07, Cuban or Haitian entrants who are pending asylum are qualified non-citizens and are eligible for FNS, as long as they meet all other requirements.
- **36** Client applies for FNS 4/15/2025. The client has terminated income for the month of April 2025 that is over 130% for their household size. Effective 5/1/2025 the household has \$0 income. The application is approved for April prorated to \$0 benefit and max allotment for May for their household size. NC FAST generates a change report form stating the household has no change reporting requirements because they were over the 130% for the application month. Is this correct, it happens often?

Yes, it is correct. Per FNS policy section 500.03 A2(c), at the time a household's income exceeds their 130% maximum allowable gross income limit for reporting requirements the household is no longer required to report changes in income.

37 With the national agreement between Homeland and IRS, what info and what conditions will client info be shared?

Nothing has changed regarding the disclosure of information for FNS.

38 SAVE in NC FAST does not show up the same way on the website. Staff are instructed to run in NC FAST first. Is there a timeframe for when SAVE in NC FAST will update to show the same way? Ex. Cuban/Haitian

There is no information regarding an update to the way NC FAST displays SAVE information at this time.

- **39** Has there been any change on the method by which applications and recerts are received as listed in policy? Currently it's listed as in person, mail-in, ePass, email. No, per FNS policy section 400.02, an FNS application may be submitted via in-person, mail, fax, email, ePASS, or the Social Security Administration.
- **40** Case number XXXXXXXX. The client submitted documents via ePass portal. Documents from a different client were pulled on her case. What should be done in this situation. Submit a Help Desk ticket. (Case number was removed for confidentiality purposes)
- **41** Can we get Job Aids on how to enter different forms into NC FAST evidence, so it is correct. The I-94 asks for alternative ID?

This request will be submitted to NC FAST.

EBT Call Center

- 1 We have received calls from customers stating the call center told them to call the county to change their address. Can the Call Center not change address? Call Center staff can change the address in EBT edge to any active address in NC FAST. If there is not an open-ended address in NC FAST call center staff will refer the customer to the county to ensure appropriate verifications are obtained prior to changing addresses in EBT Edge.
- 2 How can our county request that an EBT card be expedited to the client? Each county should follow their own internal protocol. Expediting cards results in a county cost of approximately \$20 per card and is included in the county's monthly FIS/EBT billing process. Procedurally, the worker must order the new EBT card (from within NC FAST or through ebtEDGE). Then, on the same day, a ticket is submitted to

FIS using the Client Portal to request the new EBT card be pulled and sent for overnight delivery. Counties who have a need to expedite multiple cards per day can request an account directly with CardPro, the card manufacturer, to bypass the ticketing process using the FIS Client Portal.

3 Who can we contact to get an account set up for FIS access? Is there someone we can contact directly to get access for the FIS system to be able to request or order EBT cards (replacements expedited)? There are a select few in the county that have access to the system that can submit a ticket for this and when we inquire about getting others access, we always get push back on not being able to do it.

No, due to the Separation of Duties requirement, others cannot get access to FIS for this purpose. Only those staff who your agency designated as having update capability in EBT Edge can perform the task you are referring to.

Energy

- 1 Can we put two due dates on the same DSS 8185, one for CIP and one for LIEAP? No, they must be separate DSS 8185's to avoid confusion.
- 2 Disaster Energy, is it designated for heating? As warm weather comes in how can we use the funds, can it be used for cooling? Yes, a communication is forth coming.