

our partnering agencies (Department of Social Services, Department of Mental Health, Department of Public Health, Massachusetts Rehabilitation Commission, F.O.R. Families, etc.).

Over the next few months, we will be taking a closer look at our work program requirements as well as the work program sanctions we have in place to determine whether there are ways to improve the process. In the meantime, as Department employees, we need to do all that we can to ensure that the sanctions currently in place are applied consistently, prudently and only as a last resort. We can best achieve this by maintaining a positive dialogue with our clients, providing them with a complete explanation of the work program and what it entails, helping individuals plan for any anticipated challenges through a careful assessment of their needs, providing support services, referring families to specialists and/or our partnering agencies and exploring good cause reasons for those unable to meet their obligations. Reducing the benefits available to already low income families is a drastic step that should only be made after we have taken all appropriate steps to support the family, and determined that there are no good cause reasons that explain the noncompliance.

At the same time that I am enlisting your support in this effort, I have also begun a review of our shelter noncompliance policies and practices. In a letter sent last month to our contracted shelter providers, I made a similar appeal for understanding, uniformity, intervention and fairness when implementing noncompliance procedures. We are asking shelter providers to only refer the most serious noncompliant situations, such as when a family member poses a danger to himself or others, engages in criminal behavior or uses illegal substances while residing in shelter.

Our objective is to ensure that shelter rules are uniform statewide, that clients have a complete understanding of the rules as well as the reasons these rules are in place, and that providers work with clients to develop environments that support problem solving through timely intervention. We want to minimize future instances of noncompliance by maximizing the amount of information, support and services given to shelter residents. In the future, we also plan to provide technical assistance and include “best practice” guidance on self-sufficiency and family stabilization.

Quality Corner

This month we will review two errors, one related to noncitizen calculation and the other to medical expenses.

Noncitizen Earned Income

An NPA FS case was certified as a Universal Semiannual Reporting case. The household consisted of two legal permanent resident (LPR) parents and eight children who were also LPRs. Four of the children were over 18 years old and four were under 18. The parents and the four older children were ineligible legal noncitizens for Food Stamp purposes. At the time of the most recent recertification, both parents were working full time; the four older children were also working. The earnings of the parents and the older children were entered on the Earned Income window as noncountable for Food Stamps. Consequently these earnings were not counted in the food stamp benefit calculation. This caused a substantial overpayment error. The gross income for this household had, in fact, exceeded the income limit for their household size.

What's An AU Manager to Do?

Noncitizen policy and procedures can be complex and at

times difficult to understand. AU Managers and Supervisors must refer to Policy Online to ensure that current noncitizen policy is correctly applied.

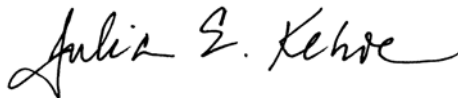
On the Earned Income window, the AU Manager should have entered the earnings of the legal but ineligible LPR adults as countable for Food Stamps. On the Noncitizen window, the AU Manager should have answered *Yes* to the Legal FS Disqualified indicator for each of the LPR adults. BEACON would then have calculated this household's Food Stamp benefits in accordance with 106 CMR 364.600 (C). For more information on calculating Food Stamp benefits for mixed households, see *A User's Guide: Transitional Assistance Programs and BEACON*, Chapter XII-E, pages 28 through 30.

Medical Deduction Error

This NPA FS case consisted of an elderly couple, both of whom received SSI. At the time of the last recertification, the client presented a \$700 dental receipt to the AU Manager. A notation on the receipt said it was paid every other month. The AU Manager divided the bill in half and subtracted \$35, allowing a medical deduction of \$315 for the certification period. The case was assigned a two-year certification period.

When clients succeed in finding jobs or locating housing, we all succeed. As we redouble our efforts towards reducing homelessness, increasing opportunities for economic self-sufficiency and improving customer service, I want to thank you all for your dedication to these priorities.

Sincerely,



Julia E. Kehoe, Commissioner

Quality Corner (con't)

Quality Control verified with the client and the client's dentist that the \$700 dental receipt was a one-time dental bill that had been paid in two installments. There seems to have been some miscommunication between the AU Manager and the clients, who were both elderly and who both had limited English proficiency.

What's An AU Manager to Do?

Considering the amount of the bill and the client's income, the AU Manager should have followed up with the client for clarification. For example, the AU Manager could have asked the client to sign a *Voluntary Authorization to Release Information* form authorizing the Department to contact the client's dentist, or the AU Manager could have asked the client how often the bill was received and how the bill was being paid. If there seemed to be a communication problem, the AU Manager should have requested the services of an interpreter, which might have been helpful in resolving the issue.

Once the bill was determined to be a one-time expense, it should have been allowed as a deduction for one month or averaged over the first 12 months of the certification period. For more information on averaging expenses, see 106 CMR 364.440(C)(D), and more recently an FYI in the June 2007 issue of *Transitions* entitled *Processing Nonrecurring Medical Expenses*.

Note: The AU Manager should not have subtracted \$35 from the medical expenses before entering the amount on the system. BEACON is programmed to automatically subtract \$35 from the total medical expenses entered for the household.