SNAP Error Prone Areas: RSDI and SSI Income

Laura Ellis | SNAP Quality Assurance Specialist | Economic Assistance and Employment Supports Division
Today’s topic will cover the SNAP error prone area of unearned income, specifically RSDI and SSI income.

We’ll look at some tips to help avoid these errors and the resources that you have available to you as well.

In reviewing the QC error cases pertaining to RSDI and/or SSI income from October 2015 – September 2016, 100% of the errors were due to Agency Error.

The “Pollyanna” way of looking at this is that we have 100% control over reducing these types of errors. We don’t always have control over some of the errors that we get cited for. For example, we can’t control what the client chooses to report or not report to us or that we can’t reach them in time for an expedited interview. The errors we will go through today are completely within our control to avoid.

This is an opportunity for success. We can do it!
In reviewing the QC case errors that were found, 3 common error categories emerged.

The first category for common errors is Agency Failure to Act. This is by far the most common source of errors for RSDI and SSI income.

**Tips:**
Look at all verifications received – the information that is provided is known to the agency and the agency must follow up to determine the next steps to take. Be mindful of inconsistent/incomplete information.

Use the production calendar to help you organize your work so that you can set yourself up for success in acting timely. Review the training on Organizing and Prioritizing Your Work found in County Link on the SNAP Resource Page and in SIR on the Training Toolkit.

Act timely on INFO DAIL messages – SDX and BNDX, etc. You can sort your DAILS using the View/Pick Selection prior to 10 day cutoff to make sure that these have all been reviewed and required actions taken.
Use the Combined Manual to determine when to act: CM 0007.15.03
Unscheduled Reporting of Changes – SNAP, CM 0008.06.01 Implementing
Changes – Program Provisions.

Remember to update the PIC along with the STAT/UNEA panel. Also remember
to approve your new results.

Take time and really examine income panels and PIC’s at renewals.

Don’t get stuck in a silo – when determining eligibility for any program, check to see the impact that may have on other programs that are active or pending. Did new verifications come in that may cause a change? Did the client report a change on the form that needs to be acted on for any program?

Many of these cases are eligible for a 2 year recertification period. Review CM 0009.03 Length of Recertification Periods for SNAP: Recertify units whose adults are ALL elderly or disabled without earned income at least once every 24 months. You must have contact with these units at least every 12 months, to remind them of when they must report changes and what changes must be reported. For MAXIS instructions, see TEMP Manual TE02.08.165 (SNAP Aged/Disabled 12 Month Contacts).

Do a thorough case note detailing income budgeted and actions taken.

**Case #1:** The agency failed to budget SSI of $733 that was documented on the bank statement provided. The client failed to report the income during the interview, but the verification was on file as demonstrated on the bank statement. The agency did not follow up on inconsistent/incomplete information.

**Case #2:** The SNAP unit provided verification that SSI was ending and RSDI was starting. The agency failed to act on the reported information.

**Case #3:** The client’s SSI changed to $117, and the agency continued to budget $178. The client was also receiving RSDI benefits for herself and under an ex-spouse for a total combined RSDI income of $636 per month. That income was not budgeted by the agency. The SSA award letter was provided by the client and the INFC/BNDX indicated those amounts as well.

**Case #4:** The client reported on the Combined Six Month Report form that the client was the only one receiving RSDI and the RSDI amount had changed to $241. The old amount of $324 continued to be budgeted. The worker did
update the STAT/UNEA panel with the new amount, but did not complete the next step of updating the PIC (Prospective Income Calculation pop-up window). When MAXIS calculated the income, it was still reading old income from the PIC, resulting in an error.

**Case #5:** The agency did not update the STAT/UNEA PIC for over 2 years. The client received $813 RSDI and $774 was budgeted. Again, the bank statements on file also showed that the client was receiving this amount monthly.

**Case #6:** The agency documented receiving verification of SSI. The worker updated the STAT/UNEA panel and the PIC, but never approved the new results. Without hitting APP to approve, all the good work that was done up to that point didn’t make the necessary change take effect on the case, resulting in an error.

**Case #7:** The client reported that their SSI had increased to $714 monthly on an Emergency Assistance application. The agency addressed the emergency need, but failed to make any changes to the UNEA panel and continued to budget $660 SSI, resulting in an error.
The second category for common errors is including non fraud overpayments when determining income.

**Tips:**
Remember to review CM 0017.15.45 when determining the amount of income to include on the UNEA panel and on the PIC (Prospective Income Calculation pop up window).

Also remember to thoroughly case note the income that you used and why, detailing any non fraud overpayments or rep payee fees that were excluded.

**Case #1:** The client was working and receiving SSI, so the SSI income was being recalculated by the Social Security Administration frequently due to the earned income fluctuations. The agency budgeted an amount that included a non fraud overpayment, which should have been excluded per policy. The overpayment was being taken out of SSI because of earned income (not due to the client fraudulently getting benefits).

**Case #2:** The agency used the gross RSDI income of $930 per month. The
client had a non fraud overpayment of $50 and a rep payee fee of $41. These should have both been excluded per policy. The agency should have used the net RSDI of $839 ($930 RSDI - $50 non fraud overpayment - $41 rep payee fee). All information was known to the agency.

**Review CM 0017.15.45.**

SNAP:
Count SSI and/or gross RSDI as unearned income, EXCEPT for the following:

- Exclude retroactive SSI benefit payments. The Social Security Administration may make payments for retroactive benefits in a 1-time lump sum payment, or in installments.

- Exclude any portion of RSDI or SSI payments that SSA recoups or that the client returns to the SSA to repay an overpayment. This exclusion does not apply to overpayments caused by the client fraudulently getting benefits.

- Exclude fees paid from SSI/RSDI to organizational representative payees as income.
The third category for common errors has to do with Medicare premiums and the FMED panel.

**Tips:**
Do NOT exclude the Medicare Premium when determining income. Count SSI and/or gross RSDI as unearned income, unless the situation meets an exception listed in CM 0017.15.45. Medicare premiums are NOT one of those exceptions.

Check to see if the client is allowed an FMED deduction for their Medicare premium. Remember to look at the Buy-In. Is the client on QMB, SLMB, QI-1? If they are not on the Buy-In, they may qualify to use their Medicare premium as a deduction on the FMED panel. Follow the policy outlined in CM 0018.12 Medical Deductions and CM 0018.12.03 Allowable SNAP Medical Expenses.

Remember to do a thorough case note.

**Case #1:** The agency budgeted the net RSDI of $1027 ($1146.90 RSDI - $104.90 Medicare Premium - $15 non fraud overpayment). The agency correctly excluded the non fraud overpayment, but should not have also
excluded the Medicare premium. $1131.90 should have been budgeted for RSDI ($1146.90 RSDI - $15 non fraud overpayment). The client was given the FMED deduction for the Medicare premium, which was correct in this scenario, as they were not on the Buy-In.

**Case #2:** The client had his $104.90 Medicare Part B premium withheld from his RSDI and was not on the Buy-In. The agency incorrectly budgeted a net RSDI amount of $553 ($657.90 RSDI - $104.90 Medicare premium). They should have budgeted the gross RSDI amount of $657.90. The client was also entitled to an FMED deduction as he was not on the Buy-In and the agency did not allow for this. The agency also did not budget the income that the client was receiving from SSI. This goes back to the failure to act category.
Resources

- Combined Manual
- POLI TEMP
- County Link - SNAP Resource Page
- SIR - MAXIS Home Page
- Scripts

Combined Manual references:
CM 0007.15.03 Unscheduled Reporting of Changes – SNAP
CM 0008.06.01 Implementing Changes – Program Provisions
CM 0017.15.45 Income from RSDI and SSI
CM 0018.12 Medical Deductions
CM 0018.12.03 Allowable SNAP Medical Expenses

County Link – SNAP Resource Page:
Elderly/Disabled Food Support Net Income Limits and Deductions
Organizing and Prioritizing Your Work

SIR MAXIS Home Page:
Protecting Information Received from DHS – Guide to Safeguarding FTI and SSA Information
SSA County DHS Quarterly Meeting Site
System Availability – MEC2/MAXIS/TSS Production Calendars
Training Toolkit –
FMED Deductions, SNAP Anticipating Income Self-Directed Presentation, SNAP Refresher Processing Changes Q&A, Organizing and Prioritizing Your Work,
Case Notes Self-Directed Presentation

**Scripts:**
Actions – Send SVES
Bulk – MA-EPD/Medi Pt B CEI
Notices – 12 Month Contact
Notes – Explanation of Income Budgeted

Remember to review the case and MAXIS and have accurate and current information on your MAXIS panels prior to running scripts!
Just a reminder for application processing – we see a lot of denials for the client not providing ID. The CM was recently updated to reflect that you can use SOLQ-I as verification of identity.

**CM 0010.18.02 Mandatory Verifications – SNAP**

**SNAP:**
Verify the following:
- Identity of the applicant and the authorized representative if the authorized representative is applying for the applicant. Identity may be verified through a document, or if a document is not available a collateral contact can be used. In addition it is allowable to use SOLQ-I as verification of identity.

Some common follow up questions are answered for you in Policy Quest.

**PQ #17482**
Question: Can SOLQ-I also be used to verify ID of the client regardless if they have applied for or are receiving SSI benefits?

Answer: SNAP is a federal program; therefore, you can use SOLQ-I to verify
PQ #17976
Question: It indicates in the CM and on the PQ that we can use SOLQ-I to verify identity. Is there a certain part of SOLQ-I that we should be looking at to verify identity or if they are known in SOLQ-I we can just go with that as that identity? We have seen where the SSN verification is “N” so we are questioning if there is a certain section on SOLQ-I we should be using before allowing this as verification of identity.

Answer: In SOLQ-I use the SSN verification section that displays after selecting “View VerifyMN”. Identity is verified only when the code in the “SSN Verification Code” is “V”. If a code other than “V” displays do not use SOLQ-I as verification of identity.
States with high performance or the most improved performance have the potential to qualify for bonus money. If eligible for bonus money, 25% is retained by the state and 75% is shared with counties.

More money = we’re better equipped and able to serve our clients and provide them access to timely and accurate benefits.

This presentation is available in County Link / SNAP Resource Page / Management Evaluation Review area / MAFAS and Mentor Presentations 2017. This presentation is also posted on the MAXIS Mentor area of SIR under Meeting Handouts and Agendas.
Please submit any policy related questions through PolicyQuest. Thanks!