August 23, 2010

Food Stamp Program Guide (FSPG) Letter No. 551

Subject	**Whereabouts Unknown, and Homelessness**

Effective Date	Upon receipt

References	All County Letter (ACL) No. 10-01 All County Information Notice (ACIN) I-20-10

Purpose	The purpose of this letter is to provide staff with guidance on how to:

- Handle food stamp cases when the whereabouts of a household is unknown;
- Assist Homeless Households in getting their identification

This clarification of existing policy will help reduce the potential for erroneous termination benefits when there are questions regarding residency or erroneous referrals for a fraud investigation.

Background	A question about the whereabouts of a household may arise when mail addressed to the household is returned to the County as "undeliverable" or "address unknown," and/or when the County discovers through EBT transaction reports that a household is using their EBT card in another state. These situations have been generally referred to as "whereabouts unknown" scenarios.

Whereabouts Unknown	A discontinuance based on "whereabouts unknown" is **NOT** appropriate in the Food Stamp Program (FSP); the discontinuance must be based on loss of residency gained from reliable information, indicating the household has moved out of the county. When mail is returned as "undeliverable" or "addressee unknown," the discontinuance Notice of Action must be based on reliable information that the household is no longer a county resident.

Loss of Residency	When mail is returned as "undeliverable" or "addressee unknown," the worker cannot assume a loss of residence. The determination of loss of residency by the worker must be based on enough reliable information. The following examples can be considered as reliable indications of loss of residency:

- ♦ A pattern of returned mail continues, and attempts to reach the household are unsuccessful;
- ♦ Appointments for recertification are sent and returned, or
- ♦ Contact from another county indicating an application has been made.

Reasons for discontinuing the case due to loss of residency must be documented in the CalWIN case comment window.

Note:
Transitional Food Stamp (TFS) households are not required to report changes in their circumstances, including address changes during the transitional period. The worker must never terminate TFS benefits solely because the address is not known. The worker can terminate TFS when it becomes known that the household has moved out of California or the TFS household is approved for either CalWORKs or FSP benefits in another household.

Households Moving to Another County	A Public Assistance Food Stamp (PAFS) household that moves out of the county and reapplies in another will be discontinued at the same time the transfer of the CalWORKs case is completed in accordance with FSPG section 63-282.5.
	Non Assistance Food Stamp (NAFS) households must be terminated at the time an address change is reported in another county.
Termination Notice	If it is determined that the household has lost residency in San Diego County, the household must be discontinued for loss of residency.
	For change reporting households, no notice is required as long as the determination is supported by reliable information that the household will not be residing in the county of benefit issuance. Refer to FSPG sections 63-261, 63-303.13 for information on change reporting households and FSPG sections 63-271, 63-303.1 for QR households.
	For QR households, the discontinuance, based on reliable information, can take place at the end of an issuance month as soon as adequate notice is provided to the household.
EBT Usage	Electronic Benefit Transfer (EBT) benefits can be accessed in a state or county other than the state or county that issued the benefits and EBT card. This means the household should be able to access their account from anywhere in the country where EBT benefits are redeemed.

Assisting Homeless Households in Getting their Identification	The homeless are particularly vulnerable to hunger and malnutrition. For this reason, it is imperative that staff make a special effort to ensure this group has access to the nutritional assistance offered by the Food Stamp Program. Special efforts include but are not limited to:

♦ Ensuring that homeless applicants and recipients receive timely, accurate and fair services such as providing Food Stamp Expedited Services (FSES) screening, EBT card and same day benefits if eligible;

♦ Providing homeless households with the choice to use an alternate address. Refer to FSPG letter 544 and section 63-152.5 for more details;

♦ Assisting homeless applicants or recipients in obtaining adequate documentation/identification. This may be a two-step process such as assisting the individual in getting a birth certificate so that they can obtain an identification card.

CalWORKs Impact	Refer to CalWORKs CPG letter number 208 for detailed policy information on Whereabouts Unknown specific to CalWORKs Program Regulations.

Medi-Cal Impact	Per Medi-Cal Program Guide 04.13.03, a discontinuance based on "whereabouts unknown" is appropriate when the worker determines that there is a loss of contact and the worker has made reasonable attempts to contact the beneficiary. When discontinuing a Medi-Cal case for whereabouts unknown, the worker shall continue to enter a "Y" in the "Whereabouts Unknown" field on the **Collect Case Summary** window. Refer to option 2c in the Automation Impact Section of this Letter for detailed instructions.

Automation Impact

Scenario 1 – Lost of Residency
Household members moves out of California and provides a new address.

If….	Then…
It is a Non Assistance Food Stamp only case (NAFS)	Staff will terminate the household for "Loss of Residency". The CalWIN required entries should be: ♦ Enter an "**N**" in the "Whereabouts Unknown" on the **Collect Case Summary window** for Food Stamp case. ♦ Make changes on the **Collect Individual Residency Detail window** for each person's record to reflect individuals that are no longer residents of San Diego County. ♦ Change the case address. ♦ Enter the future month for UEM. ♦ Run EDBC and Food Stamps will fail for loss of residency. ♦ Send notice to client and ♦ Enter case comments.
It is a Public Assistance Food Stamp case (PAFS)	♦ TFS will not be set up for Food Stamps for loss of California residency.

| | Automation Impact (continued) | Scenario 2 – Whereabouts Unknown |

Automation Impact (continued)

Scenario 2 – Whereabouts Unknown

If…	and…	then…
a) It is a Non Assistance Food Stamp only case (NAFS)	HH whereabouts is unknown	Case will close at the end of the quarter for no QR7 not for whereabouts unknown.
b) It is a CalWORKs (CW) and Food Stamps combo case,	**CalWORKs** discontinues for "whereabouts unknown" and a "Y" is entered in the Whereabouts Unknown field and run EDBC	♦ CW and Medi-Cal (MC) will fail for whereabouts unknown and ♦ CalWIN will generate **TFS** automatically (If TFS is not generated then a ticket will need to be opened). ♦ Send TFS approval, CW and MC termination NOA to HH and enter case comment.
c) It is a Medi-Cal and Food Stamp combo case,	Medi-Cal discontinues for "whereabouts unknown" at the end of July 2010,	Food Stamp case should stay open. If HH hasn't turn in the QR7, FS will close for no QR7. If QR7 is submitted on time and there is no report of a change of address, contact client to clarify the situation.

CalWIN required entries:
On the Collect Case Summary Detail Window

Field	Enter
Whereabouts Unknown	Y

Since CalWIN will also close the FS case when the MC case discontinues for "whereabouts unknown", a workaround is required. Staff must determine the next QR7 budget month and enter that future month in the UEM window and run EDBC. This process will allow Food Stamps to stay open and allow staff to make contact with the client and perform case management. For example, if QR7 Data month is June, submit month in July, the budget month would be August 2010.
On the "Collect Reporting Information For Data changes" window

Field	Enter
Food Stamps UEM	August 2010 for this scenario.

Forms Impact   None

Imaging Impact	None

Access Impact	ACCESS Customer Service Agents (CSA) will facilitate information to assist homeless households and clarify whereabouts unknown requirements and procedures outlined in this FSPG letter to clients calling ACCESS and inquiring about the process. ACCESS CSA will change the address in CalWIN to discontinue FS benefits for a QR household, based on reliable information indicating loss of residency, at the end of the issuance month with adequate notice. The ACCESS CSA will enter appropriate CalWIN Case Comments.

Operational Impact	No impact

Quality Assurance	Quality Assurance will cite the appropriate error when the requirements in this material have not been followed.

FSPG Changes/ Updates	The FSPG 63-152 and 63-117.12 have been modified and uploaded to the online FSPG.

Section	Title	Description
63-152	Table of Contents	Added on new block 63-152.8 entitled "Whereabouts Unknown"; Deleted form 16-76 as it has been combined with form 16-45 HHSA – Informing Notice For Homeless Applicants/Recipients. (Refer to EEOG document issued on 02/09 for more details.)
63-152.5 63-117.12	Homeless Households	Added information on assisting homeless households in getting their identification
63-152.8	Whereabouts Unknown	Added clarifications and procedures for whereabouts unknown.

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Whereabouts Unknown, Residency and Homelessness