

DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION	TEMPORARY CASH ASSISTANCE MANUAL	
QUALITY CONTROL - 315	COMAR 07.03.03.06	TECHNICAL ELIGIBILITY- 300

315 .1 QUALITY CONTROL PAYMENT ACCURACY REVIEWS

- A. Quality Control (QC) reviews Temporary Cash Assistance (TCA) cases for payment accuracy and to ensure work participation and work verification requirements are met.
 - 1. The case sample pulled monthly is a stratified sample and is not statistically valid in the smaller jurisdictions
 - 2. Case managers in the local departments:
 - a. Tell all customers about QC case reviews and the customer's responsibility to cooperate with the review
 - b. Advise customers that failure to cooperate may result in termination of benefits for the entire family
- B. Local departments must make case records available upon QC request. If the original record cannot be located, the local department compiles a duplicate record.
- C. Sample Selection.
 - 1. 10 percent of the monthly sample is caretaker relative and child only cases paid during the sample month
 - 2. 90 percent of the monthly sample is from all other TCA cases paid in the sample month. This includes some cases that are exempt from work participation requirements such as customers caring for a child under 1
 - 3. All cases in the sample are examined for payment accuracy
 - 4. Work eligible cases are examined for work status code on CARES: exempt or work eligible

315.2 PAYMENT ACCURACY RATE

- A. The payment accuracy rate is the percentage of benefit dollars paid correctly out of all benefit dollars for the sample cases selected at random.
- B. The QC Unit of FIA reviews for payment accuracy by:
 - 1. Analyzing case records and system data
 - 2. Reviewing CARES, MABS, SVES and MVA

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3. Comparing the data to case record data for the sample month
4. Verifying all eligibility factors in the month of review for the sampled cases based on State policy and approved local plans
5. Obtaining independent verification only if information is different, questionable, or not available.
6. Interviewing the customer
7. Making collateral contacts

315.3 QC REVIEW RESULTS PROVIDED WITH FORM TCA 16 THAT INCLUDE:

- A. Case payment findings:
 1. Eligible and correctly paid
 2. Eligible and overpaid
 3. Eligible and underpaid
 4. Ineligible
- B. Information about payment errors, when a case is not correctly paid:
 1. Code errors for type, responsibility, and cause if known
 2. Amount of the payment error
 3. Eligibility and financial factor inaccuracies that resulted in the error
 4. Whether the error is caused by the agency or customer
 5. Additional information which may affect future or past case eligibility
 - a. Changes in the sample month
 - b. IAR date on the CARES DEM2
 - c. Child Support cooperation
 - d. PPI changes

315.4 BUREAU OF CONTINUOUS IMPROVEMENT (BCI) FOLLOWS UP BY:

- A. Analyzing Quality Control review findings.
- B. Ensuring that sampled cases are corrected when required.
- C. Approving local department payment accuracy improvement plans.

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D. Monitoring implementation of the improvement plans.

315.5 THE LOCAL DEPARTMENT:

- A. Sanctions families not cooperating with the QC review process, when notified by QC.
- B. Corrects incorrectly paid cases.
- C. Processes overpayments.
- D. Issues benefits for underpaid cases if error was caused by the agency.
- E. Changes ongoing benefits for active cases when appropriate.
- F. Develops payment accuracy improvement plans/corrective action plans (CAPS) based on QC error profiles, if needed.
- G. Implements the improvement plan statewide as needed.
- H. **Can challenge** QC findings and present additional information to support their position.
 - QC considers the additional information and will change the original findings if warranted by the new evidence.

315.6 WORK PROGRAM ACCURACY RATE

The percentage of cases that was correct for work program components out of all sampled cases selected at random.

315.7 PAYMENT ERROR DETERMINATION METHODOLOGY

- A. A case is determined inaccurate if countable variances result in a difference in the benefit amount for the sample month.
- B. Graduated error threshold: QC determines an error if there is:
 1. More than a \$30 difference for household of 1-2
 2. More than a \$40 difference for households of 3-4
 3. More than \$50 difference for households of 5 or more members

315.8 WORK PROGRAM ACCURACY SCORE

A cumulative average measures the extent to which work-eligible cases in the sample were successful on work program components.

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315.9 WORK PROGRAM REQUIRED ELEMENTS

QC reviews the following elements in TCA work program requirements:

- A. Work status code for all customers.
- B. CARES coding and verification available for exempt customers.
- C. Work eligible customers:
 - 1. Participation verified or the customer is in conciliation
 - 2. Hours of attendance are documented
 - 3. Documented hours entered in the system
 - 4. Customer is countable for the Work Participation Rate (WPR)

315.10 WORK PROGRAM ERRORS

Incorrect customer coding as Exempt	Customer not assessed for good cause
Incorrect customer coding as work eligible	Sanctioned customer has good cause or is participating
Work eligible not enrolled in an activity	Hours of attendance not documented
Work eligible not participating and not in conciliation or sanction	Hours not entered into WORKS

315.11 NON-COOPERATION

- A. When the QC analyst determines that the customer is not cooperating, the analyst notifies the local department using **Form TCA 35** which:
 - 1. Indicates the specific non-cooperative actions or inactions
 - 2. Requests that the case manager contact the family to gain cooperation
 - 3. Advises that a sanction must be imposed if cooperation is not obtained
- B. The case manager determines if there is good cause for not cooperating because of circumstances beyond the customer's control, such as:
 - 1. Mail going to the wrong address
 - 2. The family was away from home, both during the period the notices were sent and the scheduled appointment

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3. A family illness or crisis required the customer's full attention
- C. When the customer does not have good cause, but now agrees to cooperate, the case manager:
1. Notifies QC
 2. Tells the customer whom to contact in QC
 3. Evaluates past experience with the individual to determine whether to begin the adverse action and closing process pending full cooperation. If the customer:
 - a. Has been cooperative and responsible in the past, the case manager may give that person another opportunity to cooperate, without initiating adverse action
 - b. Has not been cooperative in the past, the case manager may initiate the adverse action and case closing until full cooperation is achieved
- D. If the customer refuses or fails to cooperate with the QC review:
1. There is no conciliation period
 2. Send a Notice of Adverse Action and provide 10 days adverse action time
 3. Close the case using AU Status Code 556
 4. Count the TCA grant as phantom income for Food Stamps
- E. The case is reopened when the customer:
1. Cooperates in completing the QC review, reapplies for TCA, and meets all other eligibility criteria, or
 2. Reapplies and is found eligible 105 days after the end of the sample year
 - The sample year run from October through the following September

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Notes: 1. QC notifies the local department, using **Form 35A**, when:

- the customer cooperates,
- the review is completed without customer cooperation, or
- the review cannot be completed.

2. The TCA grant is counted as phantom income for the Food Supplement Program until the customer cooperates with the TCA QC review. If the customer cooperates, the phantom income is removed for the following month.

3. If the customer does not cooperate, the phantom income continues to be counted until 105 days after the end of the TCA QC sample year. The phantom income is removed for the certification period that begins 105 days or more after the end of the sample year.

F. Authorize benefits after the individual has fully cooperated with the QC review, as follows:

1. In the first non-pay month, pay full benefits for that month

2. After the first non-pay month:

- a. Pro-rate the benefit from the date of application
- b. Do not pay benefits for any month prior to the month the customer fully cooperates

G. If the customer is willing to cooperate in the first non-pay month, but is not able to fully cooperate until a subsequent month through no fault of his or her own:

- a. Pay full benefits for the month in which full cooperation was achieved
- b. Do not authorize benefits until the customer fully cooperates

H. The QC analyst and/or supervisor must notify the local department as soon as the customer cooperates

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315.12 EXAMPLES

Example 1. Ms. Apple receives TCA for herself and 2 children. She is sent an appointment letter for the QC review. Ms. Apple is not at home for the appointment and does not respond to any subsequent attempts so the local department is notified. The case manager tries to contact Ms. Apple, but she does not respond. A Notice of Adverse Action (NOAA) is issued and the case closes March 1. Ms. Apple reapplies on March 27, agrees to cooperate, and meets with the analyst on April 3.

- Do not authorize benefits for March because full cooperation is not achieved until April
- Issue full benefits for April, on or after April 3, because she began cooperating in March, but was not able to fully meet the requirement until April
- The TCA grant continued to be counted as phantom income for Food Stamps when TCA closed. Remove the phantom income when the TCA benefits begin.

Example 2. Mrs. Peach receives assistance for herself and her 3 children. She does not keep her appointment with the QC analyst and does not respond to additional attempts to reschedule. The case manager contacts Mrs. Peach on July 17. She lacks good cause, but now is willing to cooperate. The QC analyst schedules an appointment for July 22, which Mrs. Peach does not keep. The case manager is notified and sends the NOAA. Mrs. Peach calls on July 24 and says her mother was sick so she missed the appointment.

- Keep the NOAA in effect
- If Mrs. Peach can reschedule and keep an appointment before July 31, rescind the closing
- If Mrs. Peach cannot get an appointment until August, let the case close, but re-open after she cooperates and give a full benefit for August

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Example 3. The local department receives the **TCA16** on July 25, which states that Mr. Purple was overpaid \$100 in the review month of May because he began receiving Veteran's Benefits on March 23. The error was attributed to the customer, but the analyst does not suspect fraud. The local department agrees with the findings and confirms that the benefits will be ongoing.

- Send a NOAA to reduce the benefit for September
- Calculate an overpayment for May (first month that the change could have been in effect), June, July, and August

Example 4. Mrs. Orange receives assistance for her nephews. She refuses to cooperate with the QC review and cannot be persuaded by the case manager to do so.

- Close the case after giving timely and adequate notice
- If the family receives Food Stamps, the TCA grant is countable as phantom income

Example 5. Miss Plum receives assistance for herself and her daughter. She has not responded to QC and the case manager is notified. Miss Plum tells the case manager on February 14 that she just forgot, but is now willing to cooperate. Miss Plum is told that she must contact QC to schedule an appointment and that she will receive a NOAA pending notification that she has met with the QC analyst. Miss Plum does not follow through and the case is closed effective March. She reapplies in July.

- Pend Miss Plum's case, but do not open it until QC notifies the case manager that she has cooperated
- Treat this like any other application, and prorate the benefit
- If Miss Plum does not cooperate with QC within 30 days, deny the case
- The TCA grant amount has been countable as phantom income for the FSP since TCA closed effective March. The phantom income is removed if the TCA case is opened.

Example 6. The local department receives the **TCA16** on March 17 stating that Ms. Brown was overpaid \$300 in January. The case record confirms that Ms. Brown was employed and earnings were entered into CARES. QC could not find any verification of the earnings in the record and could not replicate the gross earnings in CARES. Since QC could not replicate the

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income used by the local department, the analyst recalculated and found an overpayment based on different gross earnings.

- The local department found the verifications that supported the case manager's income calculations and challenged the findings
- In this case, QC changes the case findings after agreeing that the local department used a reasonable earnings estimate and the case was correctly paid