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Informational Letter

Section 1

Transmittal:	04-INF-25
To:	Local District Commissioners
Issuing Division/Office:	Temporary Assistance
Date:	December 29, 2004
Subject:	Introduction of a Food Stamp Six-Month Reporting Desk Guide
Suggested Distribution:	Food Stamp Benefits Staff Temporary Assistance Staff Medicaid Directors Employment Coordinators WMS Coordinators Staff Development Coordinators
Contact Person(s):	Food Stamp Policy - Food Stamp Bureau at (800)-343-8859 ext. 3-1469
Attachments:	Food Stamps Six-Month Reporting Desk Guides
Attachment Available On – Line:	<input checked="" type="checkbox"/>

Filing References

Previous ADMs/INFs	Releases Cancelled	Dept. Regs.	Soc. Serv. Law & Other Legal Ref.	Manual Ref.	Misc. Ref.
04 ADM-2 02 ADM-7 01 ADM-9 03 INF-10		387.17	7CFR 273.12	FSSB Section 13	GIS Messages 04 TA/DC016 04 TA/DC015 04TA/DC009 02 TA/DC016 01 TA/DC024 01 TA/DC010

Section 2

I. Purpose

The purpose of this Informational Letter is to introduce two desk guides to assist local district workers in the interpretation and implementation of Food Stamp Simplified (Six-Month) Reporting rules. There is an Upstate and a NYC version of each desk guide.

II. Background

Food Stamp Six-Month Reporting rules were first introduced for earned income households through 01 ADM-9 in February 2001, and then extended to households with only unearned income through 02 ADM-7 effective October 1, 2002. Clarification on a number of related issues was provided in a Question & Answer format through 03 INF-10. The policy was further revised with 04 ADM-02 announcing that certain households would no longer be considered subject to Six-Month Reporting rules and changing the type of mailer sent to households with only unearned income. Questions from local districts requiring clarification, as well as direct requests from districts for this type of document, have led to the development of these desk guides.

These desk guides also reflect the clarification that six-month reporting rules do apply to most households with certification periods of **four** months or greater, including application cases certified for one partial month and three full months of participation. When six-month reporting rules were introduced, households certified for less than **six** months were not subject to six-month reporting rules. With 02 ADM-7, six-month reporting rules were extended to households certified for at least four months.

III. Program Implications

In an effort to lessen confusion and assist local district workers in understanding the rules applicable to different types of households, two desk guides have been developed. Districts may photocopy and distribute for use either or both of these guides if they find them useful.

The first guide was developed by NYS OTDA in consultation with local districts, and is labeled #1 Desk Guide on Food Stamp Change Reporting. It is a two sided document, with the intended audience or usage for each side being slightly different.

Side One displays in a chart form the types of automated mailers that are sent to households along with the associated factors that determine whether or not an automated mailer is sent and what type of mailer is sent. Side One depicts only the current policy and it may be useful in understanding whether or not a household will receive, or should have received, an automated mailer. This may be helpful for eligibility workers in explaining to a household the anticipated receipt of a mailer, or in anticipating the return of mailers from households. The note on the bottom contains information on how to identify households that were sent an automated mailer - Upstate districts can use "Quarterly Contact Datamailer Sent" screens (WMS Menu selection 24), while NYC can use the report WMS report WINRO-656.

Side Two shows the chronology of milestone changes that have occurred in the application of the Food Stamp Six-Month Reporting rules. This may be helpful in determining which reporting rules were in effect for a household at a particular point in time. This can be helpful when dealing with evaluation of potential overpayments and associated claims.

The second guide was developed by Erie County DSS and with some minor revisions by OTDA is offered as an alternative. It depicts only current FS Change Reporting policy and may be useful for eligibility workers. Both the Upstate and NYC versions of this alternative guide also contain the

information on how to identify households that were sent an automated mailer. Districts may also wish to consider keeping a one page notation sheet up front in the case record folder that clearly shows which of the reporting rules outlined on this guide apply to the household. Any change in the household's FS Change Reporting status would be noted on this sheet along with the effective date of the change in status.

These Desk Guides should assist districts to administer the Food Stamp program correctly.

Issued By _____
Name: **Russell Sykes**
Title: **Deputy Commissioner**
Division/Office: **Division of Temporary Assistance**

All FS households are subject to **6-Month Change Reporting Rules** except households in the following situations:

EXCEPTIONS TO 6-MONTH REPORTING

10-DAY REPORTING RULES (See Reverse)	TBA REPORTING RULES (See Reverse)	NYSNIP REPORTING RULES (See Reverse)
<ul style="list-style-type: none"> • HH's with no income • HH's certified for less than 4 months • Group home residents in receipt of SSI or SSD • HH's in which all adult members are aged/disabled with no earned income (except NYSNIP cases) • Migrant or seasonal farmers • Undomiciled homeless HH's (only shelter type 23) 	<ul style="list-style-type: none"> • HH's in receipt of TBA benefits (identified by FS Default/Closing codes B11-B14) 	<ul style="list-style-type: none"> • NYSNIP cases (identified by Shelter type codes 94-98)

6-MONTH REPORTING RULES (See Below)

The only change that HH's subject to 6-month reporting are required to report (other than at recert or on their 6 month report) is if their total HH income exceeds 130% of the poverty level for their household size (as set at the time of their last certification).

For 6-month reporting HH's, if reported during the course of the certification period, only the following changes reported can be reflected in the FS benefit calculations:

- Total HH monthly income exceeds 130% of the poverty level (This report must be documented in writing. If reported by phone, worker must send a written request to client to confirm information)
- The information is considered verified upon receipt
- The information is reported at recert
- The information is reported on a 6-month periodic mailer (except "Simplified Deduction" see explanation in next column)
- The HH requests to have case closed
- Changes resulting in a TA budget change
- The HH voluntarily reports and verifies information.

For all FS HH's that are certified for 7 full months or more and have earned (includes TA cases if all earnings belong to an NTA individual) and/or unearned income:

- These cases are sent a periodic mailer (LDSS-4310) which must be returned by the 10th day of the sixth month of their cert period, even if they have no changes to report
- Changes reported in the mailers must be processed even if it causes a decrease - unless the decrease is to a "Simplified Deduction" (non-move shelter, medical, or child care expenses)
- If client does not return a completed mailer, they must be sent timely notice to close FS case
- WMS report WINRO-656 is used to identify households sent a report & required to return it.

TA Face-to Face Recertification WAIVERS:

TA-FS households with only unearned income and authorized for a year under waiver are still subject to FS 6-month reporting rules. These households receive a TA six-month eligibility questionnaire developed and distributed by HRA/FIA (mail-in TA recert with FS penalty language under a TA waiver):

Completion of the TA six-month mail-in recert **IS** also a FS requirement for these households.

All FS households are subject to **6-Month Change Reporting Rules**
except households in the following situations:

EXCEPTIONS TO 6-MONTH REPORTING

10-DAY REPORTING RULES (See Reverse)	TBA REPORTING RULES (See Reverse)	NYSNIP REPORTING RULES (See Reverse)
<ul style="list-style-type: none"> • HH's with no income • HH's certified for less than 4 months • Group home residents in receipt of SSI or SSD • HH's in which all adult members are aged/disabled with no earned income (except NYSNIP cases) • Migrant or seasonal farmers • Undomiciled homeless HH's (only shelter type 23) 	<ul style="list-style-type: none"> • HH's in receipt of TBA benefits 	<ul style="list-style-type: none"> • NYSNIP cases

6-MONTH REPORTING RULES (See Below)

The only change that HH's subject to 6-month reporting are required to report (other than at recert or on their 6 month report) is if their total HH income exceeds 130% of the poverty level for their household size (as set at the time of their last certification).

For 6-month reporting HH's, if reported during the course of the certification period, only the following changes reported can be reflected in the FS benefit calculations:

- Total HH monthly income exceeds 130% of the poverty level (This report must be documented in writing. If reported by phone, worker must send a written request to client to confirm information)
- The information is considered verified upon receipt
- The information is reported at recert
- The information is reported on a 6-month periodic mailer (except "Simplified Deduction" see explanation in next column)
- The HH requests to have case closed
- Changes resulting in a TA budget change
- The HH voluntarily reports and verifies information.

For all NTA-FS HH's that are certified for 7 full months or more and have earned and/or unearned income:

- These cases are sent a periodic mailer (LDSS-4310) which must be returned by the 10th day of the sixth month of their cert period, even if they have no changes to report
- Changes reported in the mailers must be processed even if it causes a decrease - unless the decrease is to a "Simplified Deduction" (non-move shelter, medical, or child care expenses)
- If client does not return a completed mailer, they must be sent timely notice to close FS case
- Use "Quarterly Contact Datamailer Sent" screens (WMS Menu selection 24) to identify HH's sent a mailer and post completed mailers in WMS.

TA WAIVERS & TA QUARTERLY REPORTING (Limited Local Districts):

TA-FS households subject to 6-month reporting, depending on their case situation, may receive either a TA "Quarterly Report", or a local TA six-month eligibility questionnaire (mail-in TA recert with FS penalty language under a TA waiver):

- Completion of the TA "Quarterly Reports" is not also a FS requirement for these households.
- Completion of the TA six-month mail-in recert is also a FS requirement for these households.

FOOD STAMPS CHANGE REPORTING - NYC DESK GUIDE

MAILERS: PERIODIC/CHANGE REPORT CRITERIA: Which Cases Get Which Type of Mailer and When?

(Households do not have to receive a Periodic/Change Report Mailer to be subject to 6-Month Reporting Rules) (See Reverse Side)

	Case Situation	Case Type	Income	Exemption / System Criteria	Type of Mailer	Month Mailer is to be returned by HH (10 th of Month Following Mailing from NYS OTDA)
6 M O N T H	Households subject to 6-Month Reporting due to Earnings. (Includes HH's w/ All Adults A/D [Aged/Disabled])	31 (NTA-FS); or 11, 12, 16, or 17 (TA) if only NTA individual has earnings	Earned	A periodic report is sent to a TA case only if all of the household's earned income is earned by an NTA individual.	Periodic LDSS-4310 Production dependent on length of cert period - See to the right	6 th full month of auth (if FS authorization period is equal to or greater than 7 full months AND there is at least 6 months left prior to the end date of the FS authorization period) HH MUST COMPLETE & RETURN THIS MAILER (Use WMS Report WINRO-656 to identify HH's sent a Periodic Mailer.)
	FS cases subject to 6-Month Reporting due to only unearned income. (Certain Aged/Disabled cases excluded – see exclusion in 10 Day Rept)	31 (NTA-FS)	Unearned Any individuals (= or > 18 and < 60), or all inds < 18			
A/D	FS 24 Month Cases - in which all adults are aged/disabled without earnings and certified for up to 24 months. USDA requires a contact with the household at the 12 month point.	31 (NTA-FS)	No Earnings & A/D (Aged/Disabled Indicator) = X (Indicator X)		FS Change Report Form LDSS-3151	12 th full month of 24 month Auth (if FS Auth is equal to or greater than 13 full months) HH must return only if it has changes to report
10 D A Y R E P T	FS Cases are excluded from FS 6-Month Reporting because: A) all adults aged/disabled w/o earnings; B) SSI/SSD in Cong Care; C) Undomiciled; D) NYSNIP; E) TBA	31 (NTA-FS)	Unearned	A) No earnings & all adults have an A/D indicator of X; B) Unearned income type = 27 or 31 with shelter type = 15, 16, 17, 28 or 29; or C & D) Shelter type = 23, 94, 95, 96, 97, or 98; E) Food Stamp Default/Closing Codes B11, B12, B13, or B14	None	Not Applicable
TA W A I V	NYS OTDA TA Waiver of the Face-to-Face Recertification Interview	TA Case Types 11, 12, 16, or 17 (FA & SNA)	No Earned Income (earned income HH's are certified only for six month periods)		HRA-FIA developed and distributed "TA Six Month Eligibility Questionnaire" with FS Penalty Warning	6 th full month of 12 month auth HH MUST COMPLETE & RETURN THIS MAILER

FOOD STAMPS CHANGE REPORTING - NYC DESK GUIDE

WHICH HOUSEHOLDS WERE/ARE SUBJECT TO SIX-MONTH REPORTING RULES? USEFUL INFO FOR CLAIM EVALUATION

Historical Timeline – Changes in Six-Month Reporting Policy since April 2001			
HOUSEHOLD'S STATUS	<p>Six-Month Reporting Rules are about what information the household must report. Aside from responding to the automated periodic mailers (and the ABAWD requirement to report employment of less than 80 hours per month), during the course of the certification period NO 6-Month Reporting households can be required to report <u>anything</u> other than total household gross income exceeding 130% of the Poverty Level for it's size (# of members at last certification). Six-Month Reporting Rules do not always involve Periodic mailers or reports. OTDA automated Periodic mailers are sent only to NTA-FS households certified for 7 full months or longer. Usually, these are only households without income from employment because earned income households are certified for only six month periods</p>		
HOUSEHOLD'S STATUS	<p>01 ADM-9 1st Introduction of 6-Month Reporting Rules – Only affected Households with Earnings EFFECTIVE: 4/1/01 – TA/FS HOUSEHOLDS 7/1/01 – NTA-FS (& TA with only FS earnings)</p>	<p>02 ADM-7 6-MONTH REPORTING RULES EXTENDED TO FS HOUSEHOLDS WITH ONLY UNEARNED INCOME (including HH's whose only income is a Temporary Assistance Grant) EFFECTIVE 10/1/02</p>	<p>04 ADM-2 LOSS OF 6-MONTH REPORTING RULES FOR SOME HH's & CHANGE IN THE TYPE OF MAILER SENT FOR OTHERS EFFECTIVE: 5/1/04 Most Aged/Disabled HH's become 10 Day Reporters 10/1/04 Unearned Income HH's must return Periodic Mailer</p>
SUBJECT TO SIX-MONTH REPORTING RULES	<p>HH's certified for at least six months, AND</p> <ul style="list-style-type: none"> • With Earned income (including <u>non-annualized</u> self-employment) or • Had earned income budgeted earlier in the certification period, even if the income ceases 	<p>ALL Food Stamp households are subject to Six-Month Reporting Rules EXCEPT those listed in the box below (see next row entitled "Not Subject to Six-Month Reporting Rules").</p> <ul style="list-style-type: none"> • HH's with NO Income • HH's certified for less than four months (NYC systems changed generation of certification periods to six months) 	<p>ALL Food Stamp households are subject to Six-Month Reporting Rules EXCEPT those listed in the box below (see next row entitled "Not Subject to Six-Month Reporting Rules").</p> <ul style="list-style-type: none"> • <u>As of 10/1/04, Unearned Income HH's are subject to adverse action for failure to return Periodic Reports, even if there are no changes to report</u>
NOT SUBJECT TO SIX-MONTH REPORTING RULES	<ul style="list-style-type: none"> • HH's WITHOUT Earned income • HH's certified for less than four months • HH's in receipt of SSI or SSD & residing in a group home, even if earning income • Seasonal/migrant farmworkers (must be certified for 6 months or less) • HH's with earnings only from annualized self-employment 	<ul style="list-style-type: none"> • NYSNIP households (NYSNIP unique reporting rules) • HH's in receipt of SSI or SSD & residing in a group home, even if earning income • Transitional Benefit Alternative (TBA) HH's (NO Reporting rules - not required to report <u>anything</u>) • Migrant or seasonal farm worker households • Homeless (undomiciled – ABEL shelter code 23) 	<ul style="list-style-type: none"> • HH's with NO Income • HH's certified for less than four months • NYSNIP households (NYSNIP unique reporting rules) • HH's in receipt of SSI or SSD & residing in a group home, even if earning income • Transitional Benefit Alternative (TBA) HH's (NO Reporting rules - not required to report <u>anything</u>) • HH's in which ALL ADULTS are elderly/disabled & HH is WITHOUT earned income • Migrant or seasonal farm worker households • Homeless (undomiciled – ABEL shelter code 23)

FOOD STAMPS CHANGE REPORTING - UPSTATE DESK GUIDE

MAILERS: PERIODIC/CHANGE REPORT CRITERIA: Which Cases Get Which Type of Mailer and When?
 (Households do not have to receive a Periodic/Change Report Mailer to be subject to 6-Month Reporting Rules) (See Reverse Side)

	Case Situation	Case Type	Income*	Exemption / System Criteria	Type of Mailer	Month Mailer is to be returned by HH (10 th of Month Following Mailing from Albany)
6 MONTH	FS cases subject to 6-Month Reporting due to Earnings. (Includes HH's w/ All Adults A/D [Aged and Disabled])	31 (NTA-FS) or 32 (FS-Mixed)	Earned ***		Periodic *** LDSS-4310 Production dependent on length of cert period - See to the right	6 th full month of auth (if FS authorization period is equal to or greater than 7 full months) HH MUST RETURN Use WMS Selection 24, to identify cases sent a mailer and to log returns.
	FS cases subject to 6-Month Reporting due to only unearned income. (Certain Aged/Disabled cases excluded – see exclusion in 6 th row)	31 (NTA-FS) or 32 (FS-Mixed)	Unearned *** Any individuals (= or > 18 and < 60), or all inds < 18			
CAP	CAP (Child Assistance Program) Cases – CAP Districts Only	11 & Special Program Code C	**			3 rd full month & 6 th , 9 th month of 12 month auth
TA/ 1/4LY	Districts still in TA Quarterly Reporting - TA Cases with E\$judgey4 arnings	TA Case Types 11, 12, 16, or 17 (FA & SNA). Counties with TA 1/4ly	Earned ***		(Also called Quarterly Report when used for TA)	3 rd full month of 12 month auth
A/D	FS 24 Month Cases - in which all adults are aged/disabled without earnings and certified for up to 24 months. USDA requires a contact with the household at the 12 month point.	31 (NTA-FS)	Unearned A/D (Aged/Disabled Indicator) = A		FS Change Report Form - LDSS-3151	12 th full month of 24 month Auth (if FS Auth is equal to or greater than 13 full months) HH must return only if it has changes to report
10 DAY REPORT	FS Cases are excluded from FS 6-Month Reporting because: all adults aged/disabled w/o earnings; SSI/SSD in Cong Care; NYSNIP; TBA: Undomiciled; or worker entered code	31 (NTA-FS) or 32 (FS-Mixed)	Unearned	Unearned = 42 or 45 with shelter type = 10, 12, 13, 5, 16, 17, 44 or Sp Code = S or A/D Ind = A or S or Sep Det = T or Shelter type = 23 or Rep Code = E or # of inds = 01 with A/D = X or all inds = or > 60	None	Not Applicable
	TA Quarterly Reporting - TEAP cases & cases exempted by worker entered Periodic Reporting Code on WMS Screen 1.	TA Case Types 11, 12, 16, or 17 (FA & SNA). Counties with TA 1/4ly	Earned	Earned = 31 or Periodic Reporting Code = E or I		
TA WAIVER	Counties with a NYS OTDA TA Waiver of the Face-to-Face Recertification Interview	TA Case Types 11, 12, 16, or 17 (FA & SNA)	No Earned Income (earned income HH's are certified only for six month periods)		Locally developed and distributed "TA Six Month Eligibility Questionnaire" with FS Penalty Warning	6 th full month of 12 month auth HH MUST RETURN

*Periodic Reporting Code (worker entered) = B C or L produces periodic regardless of presence of income. ** All CAP cases must report regardless of presence of income or Rep code.*** On "Quarterly Contact Datamailer Sent" screens (WMS Menu selection 24), "Select Code" = "2" for Earned Income; "Select Code" = "U" for Unearned Income; "Select Code" = "1" for CAP Cases

FOOD STAMPS CHANGE REPORTING - UPSTATE DESK GUIDE

WHICH HOUSEHOLDS WERE/ARE SUBJECT TO SIX-MONTH REPORTING RULES?

USEFUL INFO FOR CLAIM EVALUATION

<p>HOUSEHOLD'S STATUS</p>	<p>Historical Timeline – Changes in Six-Month Reporting Policy Since April 2001</p> <p>Six-Month Reporting Rules are about what information the household must report. Aside from responding to the automated periodic mailers (and the ABAWD requirement to report employment of less than 80 hours per month), during the course of the certification period <u>NO</u> 6-Month Reporting households can be required to report <u>anything</u> other than total household gross income exceeding 130% of the Poverty Level for it's size (# of members at last certification). Six-Month Reporting Rules do not always involve Periodic mailers or reports. OTDA automated Periodic mailers are sent only to NTA-FS households certified for 7 full months or longer. Usually, these are only households without income from employment because earned income households are certified for only six month periods</p>		
	<p>01 ADM-9 1st Introduction of 6-Month Reporting Rules – Only affected Households with Earnings EFFECTIVE:</p> <p>4/1/01 – TA/FS HOUSEHOLDS 7/1/01 – NTA-FS & UPSTATE FS-MIXED</p>	<p>02 ADM-7 6-MONTH REPORTING RULES EXTENDED TO FS HOUSEHOLDS WITH ONLY UNEARNED INCOME (including HH's whose only income is a Temporary Assistance Grant) EFFECTIVE 10/1/02</p>	<p>04 ADM-2 LOSS OF 6-MONTH REPORTING RULES FOR SOME HH's & CHANGE IN THE TYPE OF MAILER SENT FOR OTHERS EFFECTIVE:</p> <p>5/1/04 Most Aged/Disabled HH's become 10 Day Reporters 10/1/04 Unearned Income HH's must return Periodic Mailer</p>
<p>SUBJECT TO SIX-MONTH REPORTING RULES</p>	<p>HH's certified for at least six months, AND</p> <ul style="list-style-type: none"> With Earned income (including <u>non-annualized</u> self-employment) or Had earned income budgeted earlier in the certification period, even if the income ceases 	<p>ALL Food Stamp households are subject to Six-Month Reporting Rules EXCEPT those listed in the box below (see next row entitled "Not Subject to Six-Month Reporting Rules").</p>	<p>ALL Food Stamp households are subject to Six-Month Reporting Rules EXCEPT those listed in the box below (see next row entitled "Not Subject to Six-Month Reporting Rules").</p> <ul style="list-style-type: none"> As of 10/1/04, Unearned Income HH's are subject to adverse action for failure to return Periodic Reports, even if there are no changes to report
<p>NOT SUBJECT TO SIX-MONTH REPORTING RULES</p>	<ul style="list-style-type: none"> HH's WITHOUT Earned income HH's certified for less than 6 months HH's in receipt of SSI or SSD & residing in a group home, even if earning income Seasonal/migrant farmworkers (must be certified for 6 months or less) HH's with earnings only from annualized self-employment 	<ul style="list-style-type: none"> HH's with NO Income HH's certified for less than four months NYSNIP households (NYSNIP unique reporting rules) HH's in receipt of SSI or SSD & residing in a group home, even if earning income Transitional Benefit Alternative (TBA) HH's (NO Reporting rules - not required to report <u>anything</u>) Migrant or seasonal farm worker households Homeless (undomiciled – ABEL shelter code 23) 	<ul style="list-style-type: none"> HH's with NO Income HH's certified for less than four months NYSNIP households (NYSNIP unique reporting rules) HH's in receipt of SSI or SSD & residing in a group home, even if earning income Transitional Benefit Alternative (TBA) HH's (NO Reporting rules - not required to report <u>anything</u>) HH's in which ALL ADULTS are elderly/disabled & HH is WITHOUT earned income Migrant or seasonal farm worker households Homeless (undomiciled – ABEL shelter code 23)