



## SNAP 1507-1 CASE MANAGEMENT Case Notes

**Supersedes:** FS 1507-1 (09/19/2022)

**Reference:** 7 CFR 273.12 and 273.2(f)

**Overview:** Documentation in case notes, within the eligibility system, support actions taken, and decisions made concerning eligibility/benefit determination and status of the case. Documentation must be in sufficient detail for a reviewer to determine the reasonableness and accuracy of the actions taken.

### **DEFINITION:**

A clear, concise, complete, objective journal entry of significant facts, which justify actions taken, and support eligibility decisions made by an eligibility staff member, and actions taken.

### **LEGAL RECORD:**

**Case notes are a legal record of the Department's actions.** They are used as evidence in various settings including DPHHS Fair Hearings, Administrative Disqualification Hearings, and Program Integrity fraud prosecution. Case notes serve the following purposes:

1. Chronicle a series of events.
2. Summarize non-financial and financial eligibility requirements.
3. Outline actions in cases of noncompliance.
4. List types and results of referrals.
5. Monitor compliance with eligibility and EP or SNAP Employment and Training (SNAP E&T) requirements.
6. Record SNAP ABAWD time-limits.

Case notes are extremely important to document services/referrals provided to households and the outcomes.

### **CASE NOTE ACCESSIBILITY:**

Upon request, case records, including case notes, are available to the filing unit and/or, if a release is provided, to their authorized representative. Case notes may also be viewed by other individuals involved in the eligibility determination such as Policy Specialists, Program Compliance Auditors, Regional Quality Assurance Reviewers, etc.

### **AMENDING CASE NOTES/SECURITY:**

Certain individuals engaged in administering public assistance programs have system security that allows them to record their specific actions within the case note section of the eligibility system. These individuals are:

1. Eligibility staff members.
2. Pathway Advocates.
3. Specific regional and Central Office staff.
4. System programmers; and,
5. Claims and Recovery Unit staff.

Case notes are a legal record of case history. A case note should only be changed or updated by the original author the same day it is entered. If it is later determined an error was made in a case note, an amended case note needs to be entered to document the change or correction.

### **MEDICAL CONCERNS:**

Case notes regarding medical conditions require extra caution due to both HIPAA guidelines and Medicaid regulations. Only the 'minimum necessary' information should be included, and this would rarely include an actual diagnosis. The documentation in case notes should be more generic, e.g., 'serious medical condition present, see case file' or 'medical condition present that restricts activities, see case file' or 'mental health issues present, see case file'. Those references will alert subsequent eligibility staff member to investigate when planning later participation activities and also assist Central Office in extended benefit application considerations. It is important to be especially cautious in case notes with medical information that has the potential for discriminatory action by others if disclosed.

Medical conditions should not be listed unless required for eligibility purposes and even then, general terms should be used such as blind.

### **GUIDELINES:**

The following is a partial list of some circumstances requiring a system case note. The list for each phase of the eligibility determination and case management is to be used as a guide and not as an all-inclusive list.

### **APPLICATION/REDETERMINATION INTAKE:**

1. List programs involved and household composition.
2. Details of interview:
  - a. Who completed the interview?
  - b. Unusual/questionable circumstances.
  - c. What community resources were discussed/shared.
  - d. What referrals were made; and,
  - e. What forms/resources were provided.

### **ELIGIBILITY REQUIREMENTS:**

1. Non-financial:
  - a. Explanation to support disqualifications/ineligibility such as alien status, unusual SNAP situation etc.

- b. Reasons surrounding delays in processing.
- c. Unusual SNAP situations such as student status, separate household status, questionable work registration or ABAWD status; and,
- 2. Financial:
  - a. Income - countable and excluded.
  - b. Resources - countable, excluded and/or inaccessible/jointly owned.
  - c. Vehicles - countable or excluded, licensed or unlicensed.
  - d. Transfer of resource (SNAP and MA - aged/blind /disabled only); and,
  - e. Explain questionable/unusual situations.
- 3. Income budgeting methodology used:
  - a. Identify sources of income - earned and unearned.
  - b. Earned income - hours worked, rate of pay, pay date(s), employment start/end dates, employer(s); and,
  - c. Explain questionable/unusual situations
- 4. Expenses/disregards:
  - a. Child support payments.
    - i. Paid to whom?
    - ii. What is amount legally obligated and amount paid?
  - b. Dependent care.
    - i. Who is providing care, if known?
    - ii. What is third party payment vs. co-payment?
  - c. Shelter costs (SNAP); and
    - i. Whose obligation?
    - ii. Utility allowance determination
  - d. Medical expenses (MA, FMA, and SNAP).
    - i. Whose expense?
    - ii. What expenses and method used to determine amount?
    - iii. Allowed as a deduction? why or why not?

**ELIGIBILITY CASE MANAGEMENT:**

- 1. Change reports and other related changes.
- 2. Transferring, closing or other program requests.
- 3. ADH/IPV investigations.
- 4. Over/Under payments/issuance.
- 5. Fair Hearing requests and decisions; and,
- 6. Referral to other community/agency resources

**Effective Date:** April 12, 2023