



SNAP 1507-1 Case Notices

References:	45 CFR 206.10; 7 CFR 273.12 and 273.2(f); ARM 37.82.101 & .78.102
Overview:	GENERAL RULE: Case files must be documented on system case notes to support actions taken and decisions made concerning eligibility/benefit determination and current status of the case. Documentation must be in sufficient detail for a reviewer to determine the reasonableness and accuracy of the actions taken.
Policy:	DEFINITION A clear, concise, complete, objective journal entry of significant facts, which justify actions taken, and supports eligibility decisions made by OPA Staff, and case management actions by WoRC staff.
	LEGAL RECORD Case notes are a legal record of the Department's actions. They have been used as evidence in various settings including DPHHS Fair Hearings, Administrative Disqualification Hearings, and Program Integrity fraud prosecution. Case notes serve the following purposes: <ol style="list-style-type: none">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. Describe development and progress of FIA/Employment Plan (EP) activities;6. Monitor compliance with eligibility and FIA/EP or SNAP Employment and Training (SNAP E&T) requirements;7. Record TANF Cash Assistance and FS ABAWD time-limits; and,8. Document the family's progress in finding alternatives to public assistance; identify and facilitate the family's access to services; identify barriers to employment and how the barriers were addressed. Case notes are extremely important to document services provided to households with less than 12 months remaining on their time clock and for determination of TANF Extended Benefits. Good documentation of activities, successes and failures will have an important bearing on the determination of benefits beyond 60 months.
	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 the WoRC Case Managers, Policy Specialists, Program Compliance Auditors, Regional Quality Assurance Reviewers, SNAP Employment and Training Case Managers, etc.
	AMENDING CASE NOTES/SECURITY Certain individuals engaged in administering public assistance programs and case management have system security that allows them to record their specific actions on the CANO screen. These individuals are: <ol style="list-style-type: none">1. Office of Public Assistance (OPA) eligibility staff;2. WoRC/SNAP E&T Case Managers;3. Specific regional and Central Office staff;

	<p>4. System programmers; and, 5. Claims and Recovery Unit staff.</p> <p>Case notes are a legal record of case history. A case note should only be changed or updated by the <u>original author</u> 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.</p>
	<p>MEDICAL CONCERNS</p> <p>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 alert subsequent OPA Case Managers 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.</p> <p>Medical conditions should not be listed unless required for eligibility purposes and even then general terms should be used such as blind. (See 801-2 for guidance on TANF at-risk/extension case notes.)</p>
	<p>GUIDELINES</p> <p>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 <u>guide</u> and not as an all-inclusive list.</p> <p><u>APPLICATION/REDETERMINATION INTAKE</u></p> <ol style="list-style-type: none"> 1. List programs involved and household composition. 2. Details of interview: <ol style="list-style-type: none"> a. Who was present or why an interview did not take place for Medicaid; b. Why the household needs public assistance (general terms); c. Unusual/questionable circumstances; d. What community resources were discussed/shared (e.g., MA 165 Medicaid Recipient Handbook); e. What referrals were made; and, f. What forms/resources were provided. <p><u>ELIGIBILITY REQUIREMENTS</u></p> <ol style="list-style-type: none"> 1. Non-financial: <ol style="list-style-type: none"> a. Explanation to support disqualifications/ineligibility such as alien status, TANF sanctions, unusual SNAP situation etc.; b. Reasons surrounding delays in processing; c. Unusual TANF or FMA situations such as teen parent living arrangement or caretaker relative other than natural, adoptive or stepparent; d. Unusual FS situations such as student status, separate household status, questionable work registration or ABAWD status; and, e. TANF Cash Assistance time clock, at-risk or TANF extension status. 2. Financial requirements that are not fully explained by the entry code on the appropriate TEAMS screens: <ol style="list-style-type: none"> 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. Explain method used and why;
 - b. Identify sources of income - earned and unearned;
 - c. Earned income - hours worked, rate of pay, pay date(s), employment start/end dates, employer(s), calculations; and,
 - d. Explain questionable/unusual situations
4. Expenses/disregards that are not fully explained by entry codes on system:
- a. Child support payments;
 - Paid to whom?
 - What is amount legally obligated and amount paid?
 - b. Dependent care;
 - Who is providing care, if known?
 - What is third party payment vs. co-payment?
 - c. Shelter costs (SNAP); and
 - Whose obligation?
 - Utility allowance determination
 - d. Medical expenses (MA, FMA, and SNAP);
 - Whose expense?
 - What expenses and method used to determine amount?
 - Allowed as a deduction? why or why not?

NEGOTIATING/RENEWING THE FIA/RP and TIME CLOCK ADJUSTMENTS

1. Who needs to complete a FIA/EP;
2. Goals, barriers and progress related to self-sufficiency or at-risk plan;
3. Child care needs - hours/week/month; which child(ren);
4. Monitoring tools (calendars, time sheets, etc.);
5. Conciliation /Sanction activities; and,
6. Current time clock and retroactive time clock adjustments.

ELIGIBILITY CASE MANAGEMENT

1. Change reports and other related changes;
2. Essential For Employment requests;
3. Requests for Extended TANF benefits and claimed extension criterion;
4. Requests for retro-Medicaid;
5. Transferring, closing or other program requests;
6. ADH/IPV investigations;
7. Over/Under payments/issuance;
8. Fair Hearing requests and decisions; and,
9. Referral to other community/agency resources.

WORC CASE MANAGEMENT

At minimum, case notes are mandatory in the following instances:

1. Initial enrollment/delayed engagement;
2. Employment gained or lost;
3. Non-compliance triggers outreach/conciliation;
4. Home visit completed;

	<ul style="list-style-type: none">5. Sanction recommended;6. Monthly progress notes/evaluations or assessments completed;7. 90-day review of employment plan for long-range progress;8. Hours reconstructed for reconciliation; and,9. Closure notes of progress, future plans, and resolutions if applicable.
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