



HUMAN SERVICES
DEPARTMENT

Susana Martinez, Governor
Brent Earnest, Secretary
Christopher Collins, Deputy Secretary
& General Counsel
Mary Brogdon, Division Director

General Information Memorandum

ISD GI 18-60

TO: ISD County Directors, Regional Operations Managers

FROM:  Mary Brogdon, Division Director, Income Support Division

RE: QC Findings Sanction Process- Drop 3's Refusal to Cooperate

DATE: December 26, 2018

This GI is to rescind GI 18-30 and to change the date of sanction removal to January 20, 2020. Please use the new date in the language in the ISD 201's to recipients and in case comments.

Sanction Periods (Year-end date will change each FFY)

A household that refuses to cooperate with a state QC review will be determined ineligible effective the month following the month the adverse action notice time limit expires. Ineligibility will continue until 95 days from the end of the annual QC review period (January 5) during which non-cooperation is found. The annual QC review period begins October 1 and ends September 30. (The 5th will remain the same but the year will change each FFY as a QC review period ends.) 8.139.110.12 B (4)(a)(i) NMAC

A household that refuses to cooperate with a **federal** QC review will be ineligible effective the month following the month the adverse action notice time limit expires. Ineligibility will continue until seven months from the end of the annual review period (May 1) during which non-cooperation is found. The annual QC review period begins October 1 and ends September 30. 8.139. 110.12 B (4)(a)(ii) NMAC

Household Budget group is not cooperating with QC:

- CD is notified by QC Reviewer (QCR) via memo/email for help to get client to cooperate with QC.
- Within 24 hours CD sends ISD 201, Notice to Client, to recipient asking for cooperation:
 - Language for ISD 201:

Failure to contact Quality Control for an appointment or failure to provide any requested verification will result in your SNAP case closure. If QC does not hear from you within 10 days, your benefits will be terminated and you may be referred for investigation of willful misrepresentation. **(QC Reviewer's Name)** may be reached at **(QCR phone number)**. This action is taken per 8.139.110.12 B (4) NMAC and CFR 275.12 (g)(1)(ii)

- Indicate only SNAP on ISD 201 Enter into case comments, QCR name and contact information and that ISD 201 was sent.
- If case is already closed, generate Notice to Client (ISD 201) and notate in case comments.
- Whether case was opened or closed, when sanction is entered; send via email notification to QCR that ISD 201 has been sent and notice will be in correspondence.
- If recipient calls or comes in to request a rescheduled interview with QCR, give recipient the QCR contact information from case comments and notate interaction in case comments.

45 days into review - CD is notified to sanction/close case for Refusal Non-cooperation by QC Supervisor via memo/email. Scan memo into EFC.

CD will sanction within 24 hours.

- Left Nav > Data Collection > Sanctions > Questions > Select "Yes" under Non Cooperation > select "Quality Control/Audits" > Non-cooperation Date= *Date the 1st request for cooperation was sent by QCR* > Non-cooperation Discovery Date= *date of memo FROM the QC Supervisor to sanction case*. Then run EDBC & NOCA will generate.

Please note: QC sanction notice will be automatically suppressed when the NOCA is generated.

- Left Nav > Data Collection > Sanctions>Questions > Select “Yes” under Non Cooperation

Non-Coop./Sanctions Visited 29

Questions - Non-Coop./Sanctions ? ★ 📄 👤 🔍 🚫 📄 📄 📄 📄

Case Name: ██████████ Case #: ██████████ Case Action: Case change Case Status: Approved

Reset Previous Next

Non Cooperation

* is anyone in the program non-compliant with the program requirements? YES ▾

IPV Sanctions

* is there anyone in the case with a SNAP Intentional Program Violation (IPV)? NO ▾

Reset Previous Next

- Click Next, Select “Add Non-Cooperation” > select “Quality Control/Audits” > Non-cooperation Date= Date the 1st request for cooperation was sent by QCR > Non-cooperation Discovery Date= date of memo FROM the QC Supervisor to sanction case. Then run EDBC & NOCA will generate.

Non-Cooperation - Details ? ★ 📄 👤 🔍 🚫 📄 📄 📄 📄

Case Name: ██████████ Case #: ██████████ Case Action: Case change Case Status: Approved

Reset Cancel + Add Non-Cooperation + Previous + Continue

Individual Information

Non-Cooperation Source:

* Name: ██████████ Individual #: ██████████

Dates

* Non-Cooperation Type: Quality Control/Audits ▾

* Non-Cooperation Description: Refused to supply information ▾

* Non-Cooperation Date: 05 / 15 / 2018 📅

* Non-Cooperation Discovery Date: 05 / 30 / 2018 📅

Good Cause Status/Reason: ▾

Date Good Cause Determined: mm / dd / yyyy 📅

Conciliation Date: mm / dd / yyyy 📅

30-day Conciliation Due Date: mm / dd / yyyy 📅

Did the individual contact the department within 10 days? ▾

Date Conciliation Conference was held: mm / dd / yyyy 📅

Individual has taken action to correct non-cooperation? ▾

Date individual took action to cooperate: mm / dd / yyyy 📅

Reset Cancel + Add Non-Cooperation + Previous + Continue

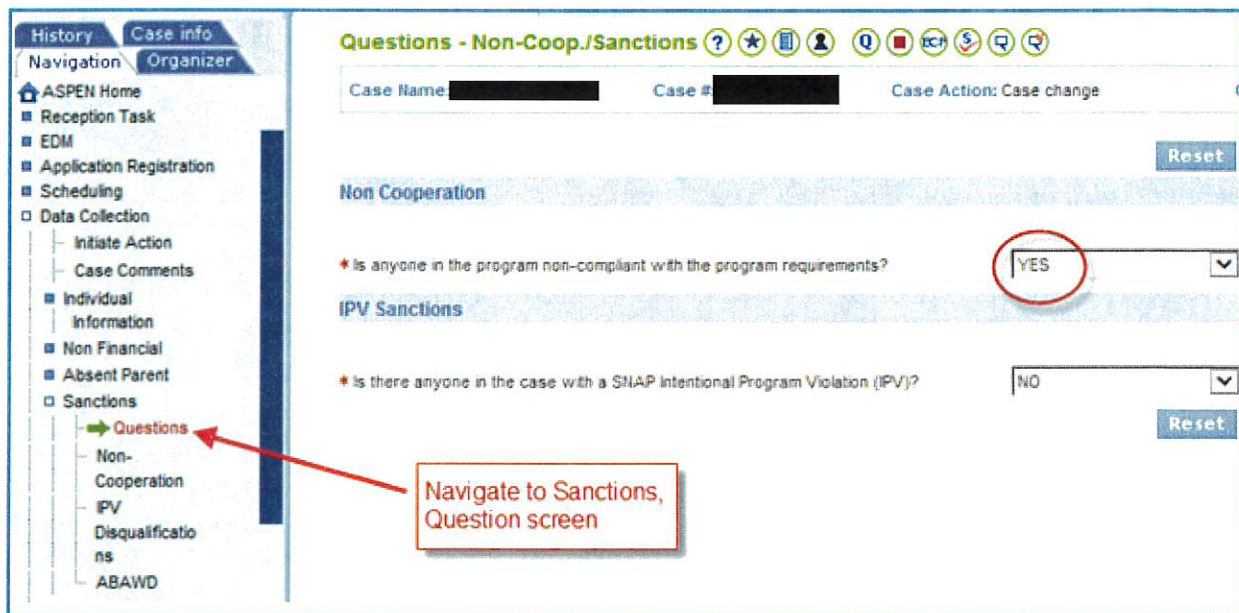
Enter into case comments:

As per 8.139.110.12 B (4) NMAC and CFR 273.2(d)(2): The Household Budget Group will remain sanctioned until HH cooperates or has served out the QC sanction period. QC Sanction can be lifted **January 5, 2020**. Recipient may contact QC at XXX-XXXX (enter local # of QCR on Memo from QC) or, toll free for clients only, at 1-800-771-8075.

If case already closed for other reasons:

- Enter QC sanction on sanction screen ;

Step 1 – Initiate action Case change, in Data collection > Sanctions > Questions – ‘Yes’ should be selected (this will queue up the Non-Cooperation screen):



Step 2 – Enter mandatory fields for ‘Quality Control/Audits’ Non-Cooperation Type. Click Save and Continue.

Non-Cooperation - Details ? * [Icons]

Case Name: [Redacted] Case: [Redacted] Case Action: Case change Case Status: Approved

Reset Cancel + Add Non-Cooperation + Previous + Continue

Individual Information

Non-Cooperation Source:
 * Name: [Redacted] / 26M Individual #: 0000732267

Dates

* Non-Cooperation Type: Quality Control/Audits
 * Non-Cooperation Description: Refused to supply information
 * Non-Cooperation Date: 01 / 24 / 2018
 * Non-Cooperation Discovery Date: 06 / 06 / 2018
 Good Cause Status/Reason:
 Date Good Cause Determined: [mm / dd / yyyy]
 Conciliation Date: [mm / dd / yyyy]
 30-day Conciliation Due Date: [mm / dd / yyyy]
 Did the individual contact the department within 10 days?:
 Date Conciliation Conference was held: [mm / dd / yyyy]
 Individual has taken action to correct non-cooperation?: NO
 Date individual took action to cooperate: [mm / dd / yyyy]

Reset Cancel + Add Non-Cooperation + Previous + Continue

Step 3 – (the next screen to queue up is set up to enter the sanction level) Enter data and click add so that the record populates at the bottom of the screen. Click Save and Continue.

Non-Cooperation - Disqualification/Sanction Override ? * [Icons]

Case Name: [Redacted] Case: [Redacted] Case Action: Case change Case Status: Approved

Cancel Previous + Continue

Individual Information

Name: [Redacted] Individual #: [Redacted]

Disqualification/Sanction

* Program: [Dropdown]
 * Disqualification/Sanction Level: [Dropdown]
 * Disqualification/Sanction Begin Date: [mm / dd / yyyy]
 * Disqualification/Sanction End Date: [mm / dd / yyyy]
 Excused?: [Dropdown] Good Cause?: [Dropdown]

Reset Add

Program	Disqualification/Sanction Level	Disqualification/Sanction Begin Date	Disqualification/Sanction End Date	Excused	Good Cause
SNAP	1	04/01/2018	10/31/2018	NO	NO

- Send an ISD 201 to client indicating SNAP only with the language below:

Household refused to contact Quality Control (QC) for an appointment or refused to provide requested verification. This will result in your SNAP case closure. Your SNAP benefits will be terminated and you may be referred for investigation of willful misrepresentation. This action is taken per 8.139.110.12 B(4) NMAC and CFR 275.12 (g)(1)(ii). The Household will remain sanctioned until HH cooperates or has served out the QC sanction period. QC Sanction can be lifted **January 5, 2020**. CFR 273.2(d)(2) You may contact QC at XXX-XXXX (enter local # of QCR on Memo from QC) or, toll free for clients only, at 1-800-771-8075.

- Enter into case comments:

HH needs to contact QC prior to re-opening SNAP case; the household has refused to cooperate with QC. SNAP cannot be approved until HH cooperates with QC or until **January 5, 2020**. CFR 273.2(d)(2)

If recipient complies with QCR

- Notice of cooperation will be received by CD from QCR via email.
- Scan into case file
- Enter into case comments
- Enter the end date (date of memo) under sanctions

The county QC-071 “Drop 3’s” in the county folders on the QIS Shared drive each month will still indicate on refusals to, “Please take administrative action.” CDs can utilize this as a double check that sanction was placed.

If you have questions regarding this GI, the contact person is Carolyn Craven at (505) 827-7224 or email at carolyn.craven@state.nm.us.