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TRANSMITTAL: 93 INF-10

TO: Commissioners of
 Social Services

DIVISION: Economic
 Security

DATE: March 1, 1993

SUBJECT: Electronic Benefit Issuance and Control System
 (EBICS) Questions and Answers

SUGGESTED

DISTRIBUTION: Income Maintenance Directors
 Food Stamp Directors
 EBICS Coordinators
 Staff Development Coordinators
 WMS and BICS Coordinators

CONTACT PERSON: Call 1-800-342-3715 and ask for the following:
 Information Technology Management - Dan Berry
 extension 6-5100
 Income Support Bureau - Greg Nolan
 extension 4-9313
 Food Stamps - Contact Your County
 Representative at extension 4-9225
 Bureau of Local Financial Operations -
 Upstate - Roland Levie extension 4-7549
 Metropolitan Area - Marvin Gold (212) 804-1108

ATTACHMENTS: None

FILING REFERENCES

Previous ADMs/INFs	Releases Cancelled	Dept. Rags.	Soc. Serv. Law & Other Legal Ref.	Manual Ref.	Misc. Ref.
92 INF-15				FSSB X-G-2-3	

Purpose

The purpose of this letter is to share with local districts questions and answers which have been raised at the Electronic Benefits Issuance and Control System (EBICS) regional training sessions.

PRORATION QUESTIONS

Question #1: An agency issued a monthly rent voucher that the landlord has not yet returned to the agency. If the PA worker is now closing the case the 10th of the month, must the agency prorate the voucher for nine days when it is returned?

Answer: No, once a monthly rent voucher has been sent to a landlord, the agency must honor the full monthly amount. However, if the recipient was ineligible from the 10th of the month on, the agency must calculate an overpayment for the portion of the monthly voucher which covers the period from the 10th through the 30th.

Question #2: Must an agency use the new proration edits on WMS to determine and authorize prorated benefits?

Answer: No, an agency may still prorate benefits manually and authorize them with an appropriate payment type (such as a "69" or "06" for cash grants) on WMS.

Question #3: How does the 30 day standard concept apply when prorating a grant in February, which only has 28 calendar days?

Answer: A 30 day standard means that each month is considered to have 30 days for budgetary purposes, regardless of the actual number of days in the calendar month. Likewise, semi-monthly periods are considered to have 15 days. Thus, the month of February would be looked at as if it has 30 days. For example, an agency is reducing a recipient from a \$300 semi-monthly cash grant to a \$150 semi-monthly cash grant effective February 23rd. The recipient is entitled to 7 days at a \$300 semi monthly cash grant rate (February 16th through 22nd) and 8 days at a \$150 semi monthly cash grant rate (February 23rd to end of month).

Question #4: Under date specific eligibility rules, if PA benefits go out for a time period beyond the effective date of the closing notice, is the overpayment always calculated beginning with the effective date of the notice?

Answer: Any PA benefits provided for a period in which the client was not entitled to them are overpayments. Often this period of ineligibility

begins with the effective date of the notice. For example, if a client fails to recertify on the 9th and is sent a discontinuance notice effective the 19th, then the date the client would be ineligible would be the 19th. Any PA benefits provided for the period beginning with the 19th would be an overpayment.

It is important to note, however, that sometimes ineligibility or entitlement to reduced benefits can predate the effective date of the notice. This normally occurs when the reduced benefits results from a financial change in circumstances, i.e. resources, income, need, lump sums, etc. For example, an agency is informed on August 10th that a client has had a \$2,000 savings account since January 10th. That same day, the agency sends a discontinuance notice effective August 20th. While the client would be discontinued on the effective date on the notice, actual ineligibility began January 1st, and the overpayment calculation would begin with the month of January.

Question #5: Do proration rules apply to the \$50 child support pass-through or the pregnancy allowance?

Answer: Proration rules do not apply to the \$50 child pass-through, since these payments are not made with public assistance monies.

A pregnancy allowance is not prorated for the initial month of eligibility for the allowance (no earlier than the fourth month of pregnancy) nor the month the child is born. In these instances, the full monthly allowance is provided. For example, if a recipient's fourth month of a medically verified pregnancy begins on March 21st, the recipient is entitled to receive \$50 for March. The same holds true if the child were born on March 21st.

However, if an agency is discontinuing a public assistance recipient, the pregnancy allowance must be prorated like all other public assistance allowances. For example, if a pregnant recipient's PA case is being closed effective June 6th, the recipient would be entitled to five days of the pregnancy allowance, or $\$50 \text{ divided by } 30 \text{ days} \times 5 \text{ days} = \8.33 .

Question #6: When a client fails to recertify, is it acceptable to wait until the end of the current authorization period to close the case?

Answer: No. The social services district must provide timely notice as soon as possible and prorate the PA benefit to coincide with the effective date of the notice. If the benefit cannot be prorated because it has already been issued, then an overpayment must be calculated to reflect any benefits provided from the effective date of the notice.

Question #7: Suppose an ADC client's case is closed on the 7th of the month and the client reapplies later in the month. Is public assistance provided retroactive to the closing?

Answer: Any request for assistance after closing is considered a new application, even though a new application form is not required if the client reapplies within 30 days of closing. As with all ADC and PG-ADC applications, PA benefits must be prorated from the date of compliance. Therefore, PA benefits are not restored to the date of closing.

However, if necessary to retain the housing, a full month's shelter allowance can be provided. For cases that have already been active on PA for a portion of the month, this means that the shelter allowance can be restored retroactive to the date of closing.

Question #8: We understand that a 30 day standard is used for prorating grants. Does this concept apply anywhere else? For example, when writing a timely notice on February 26 do you consider February to have 30 days and "count" the 29th and 30th towards the ten day period?

Answer: No. The "30 day standard" is a concept that applies strictly to budgeting. It does not apply to notices or other areas, such as the HR 45 day rule for applicants. Thus, a timely discontinuance notice sent on February 26 would be effective on March 8th in non-leap years.

Question #9: Do date specific eligibility rules impact "whole month budgeting"?

Answer: No. Total monthly income must still be applied against the whole month's PA needs to determine eligibility and benefits. However, if a recipient becomes ineligible, the agency must adjust the grant as soon as possible to reduce any overpayment. For example, a client becomes employed on April 1st and notifies the agency on April 8. Since the client's income exceeds his/her PA needs, the agency sends a discontinuance notice effective April 18th. The semi-monthly benefit is then prorated for the 16th and 17th. Any benefits that have gone out for April are considered an overpayment.

Question #10: What options are there under EBICS for payment of shelter?

Answer: Under EBICS, WMS will support the following:

1. Providing the client with the shelter money in his/her semi-monthly electronic benefit;
2. Providing two-party checks naming both the landlord and the client. The checks can then be directed to either the landlord or client;
3. Generating vouchers which are then processed in BICs for production of a check made out to the landlord. Districts have the option of mailing the vouchers to the landlord for signature prior to payment, or of processing and paying the voucher without signature. Districts must make this choice in accordance with the fiscal control they feel necessary for these payments.

While WMS will support these three different methods of payment, districts are reminded that the appropriateness of each method is not always solely the discretion of the district. Under the ADC program, the shelter payment has to be made as an unrestricted payment unless there has been a finding of mismanagement or the recipient has agreed to restriction. For HR, the agency may restrict payment without the consent of the recipient.

Question #11: What about per diem allowances for shelter? Are they subject to the 30 day standard rule?

Answer: No. The agency can pay a per diem for each night the client spends in a facility. Per diems are usually paid in emergency situations, such as domestic violence, hotels, etc.

EBICS POLICY QUESTIONS

Question #1: What happens if a recipient does not pick-up his/her electronic cash benefit before it expires, but then comes into the social services district shortly thereafter asking for the cash benefits? For example, a recipient (PA 347895) can pick-up his/her Cycle A benefit from January 5th through January 19th. On January 20th, the "Cycle A" benefit expires and the "Cycle B" benefit becomes available. The recipient then comes into the district on January 21st requesting the "Cycle A" benefit be replaced.

Answer: The "cycle A" benefit must be reauthorized. However, the district should inquire as to why the benefit was not accessed before it expired. There may be a change in circumstances that impacts eligibility. Also, remember that recipients who do not pick-up their cash benefits for a two month period are ineligible for public assistance.

Question #2: If a recipient does not pick-up his/her electronic cash benefit for a two month period, his/her public assistance is discontinued. How are medical assistance and food stamps treated when the PA case is closed?

Answer: Food Stamps must also be discontinued when the PA portion of the case is closed for this reason because it is assumed that the client has moved out of the project area.

All PA cases closed for this reason must be given separate determinations for MA.

Question #3: Only upstate social services districts will be on EBICS by February 1993. How will districts be able to get benefits to clients that move to New York City (NYC) when an upstate district is still financially responsible?

Answer: If an upstate district has continuing responsibility for a client residing in NYC, the client will not be able to access their cash benefits electronically in NYC. These payments must be made by paper checks using the "Associated Name" field on WMS.

Question #4: Is a photo CBIC card necessary to access electronic benefits?

Answer: No, a photo is not required on the CBIC card in order to access electronic cash benefits. All that is required is a CBIC card and a Personal Identification Number (PIN). Issuance sites are not being instructed to check the photo or signature on the CBIC card.

However, it is important that each client have a photo on his/her CBIC card. Both State Law (SSL 131) and Department regulations (18NYCRR 383.3) require that a photo be on the ID card. This is particularly important for medical assistance to ensure that the person receiving treatment is actually an MA recipient.

Question #5: If a client cannot pick-up his/her regular "Cycle A" payment until the 9th of the month, can regular or emergency benefits be given for the 1st through 8th to hold the client over until the pick-up date? What about at EBICS conversion only?

Answer: No, to do so would be to duplicate benefits. The "Cycle A" payment covers the period from the 1st through the 15th, and the "Cycle B", the period from the 16th to the 30th. This would also apply to conversion to EBICS.

Question #6: If the client receives the shelter allowance in his/her cash grant, and the cash grant is first available to be picked up after the 5th of the month and split between the "Cycle A" and "Cycle B", some recipients may be charged a late fee. Can the district pay these late fees?

Answer: No. There is not authority in Department regulations to pay late fees. The district should discuss two party checks and/or vouchers with these clients to avoid late fees.

Question #7: What about cash payments (i.e., personal needs allowance) to clients in congregate care facilities. How will disabled clients access these benefits?

Answer: The same issue exists now with paper checks. Often a caseworker acting on behalf of the facility will cash the client's paper check and deposit the money in the client's checking account or return it to the client. The same holds true with electronic cash payments, except that the caseworker would now need the client's CBIC and PIN in place of the client's signature.

Another option is to make the payment as a two party check sent to the facility and client. The caseworker can then deposit it in a checking account or distribute it to the client. Clients who are capable must be willing to agree to this. Note that for residential care facilities, State law mandates that the PNA be provided in this manner. The proper payment type code to use on the DSS-3209 for these payments is "E-9".

Question #8: Suppose a client loses his/her CBIC card and has written his/her PIN on the card. Can the agency replace benefits if someone finds the CBIC and accesses the benefits?

Answer: No. The only time benefits can be replaced is if the Department established that a bona fide computer transaction did not occur when the CBIC and PIN are used to access benefits or when it can clearly be established that the client left the issuance site with less benefits than indicated on their receipt.

Clients have been advised not to write their PIN on the CBIC card.

Question #9: Does there have to be an emergency (immediate need) situation for the district to preregister a single issuance cash benefit so that it is available that same day for the client?

Answer: No. A district may preregister a single issuance whenever the district feels it is necessary to provide the client with the same day cash benefit.

Question #10: How are HEAP benefits issued under EBICS?

Answer: HEAP benefits authorized on a PA or NPA Food Stamp case are issued as an electronic benefit in the next schedule PAB run after the respective HEAP lock is turned off by the district. HEAP benefits authorized on a HEAP case (Case Type 60) are issued as paper checks in the district's next scheduled paper check run after the NPA HEAP lock is turned off. Districts can prevent the issuance of HEAP benefits by keeping the HEAP locks on. There is no change to the way the HEAP indirect payments are handled by BICS.

Question #11: Can a client whose case is closed obtain his/her benefit using their card and PIN?

Answer: Yes. The card and PIN remain connected to the case number until the last day of the second month after the closing (two months after the AUTH-TO date month).

Question #12: Does closing a case stop a benefit that has been issued?

Answer: An issued benefit will be rescinded at case closing if (1) the benefit has not already been redeemed and (2) the payment line is truncated to a date preceding the issued benefit's TO-DATE. Otherwise a cancel or payment line or a BICS Accounts rescind transaction is needed to stop the benefit.

EXAMPLE: Case closing on 11/13 effective 11/23, a recurring benefit for 11/16 has been issued and has not yet been obtained by the client. The worker wants to stop the 11/16 payment and authorize a pro-rated payment for the period 11/16 - 11/22. The action required would be to truncate the recurring payline to 11/15 - this would send a rescind record to Citicorp to stop the issued benefit.

Question #13: How can I predict when a single issue benefit will be available to a client?

Answer: Single issue PABs are produced each weekday night. Direct payments with from dates up to and including the following day's date will be selected. The benefit will be available to the client on the day after the next business day.

Future singles wait as standing payment lines until the run on the night before their FROM date.

<u>Run</u>	<u>Issue Date</u>	<u>Availability Date</u>
MON	TUE	WED
TUES	WED	THURS
WED	THURS	FRI
THURS	FRI	SAT
FRI	SAT	TUES

Single issue benefit runs are not scheduled on Network Holidays. Benefits that would have been produced will be produced in the next schedule run. For example:

1A. Monday Holiday: ML King Birthday

<u>Holiday</u>	<u>Run</u>	<u>Issue Date</u>	<u>Availability Date</u>
MON (no run)	TUES (O/N)	WED	THURS

1B. FRI O/N run with Monday Holiday

<u>Run</u>	<u>Issue Date</u>	<u>Holiday</u>	<u>Availability Date</u>
FRI (O/N)	SAT	MON	WED

2. Weekday Holiday: Thanksgiving

<u>Holiday</u>	<u>Run</u>	<u>Issue Date</u>	<u>Availability Date</u>
THURS	FRI (O/N)	SAT	TUES

3. Friday Holiday: New Year's Day

<u>Run</u>	<u>Holiday/Issue Date</u>	<u>Availability Date</u>
THURS (12/31)	FRI (1/1)	TUES (1/5)

If the 1st or 16th of a month falls on a SUN or MON, a special single issue run will be scheduled on the weekend to produce the benefits for review on MON and availability to clients on TUES. Districts will be advised in EBICS NEWS when these runs will be scheduled. To illustrate:

1. First day of Month on Sunday

<u>Run</u>	<u>Issue Date</u>	<u>Review Date</u>	<u>Availability Date</u>
SAT	SUN (1st)	MON (2nd)	TUES (3rd)

2. Sixteenth on Monday

<u>Run</u>	<u>Issue Date</u>	<u>Review Date</u>	<u>Availability Date</u>
SUN	MON (16th)	MON (17th)	TUES (18th)

Date March 1, 1993

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Should you or your staff have questions about this letter or any other aspect of EBICS implementation, please contact the appropriate individuals listed on the cover sheet.

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