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## Administrative Directive

### Section 1

<b>Transmittal:</b>	05-ADM-16
<b>To:</b>	Local District Commissioners
<b>Issuing Division/Office:</b>	Division of Employment and Transitional Supports
<b>Date:</b>	October 7, 2005
<b>Subject:</b>	Temporary Assistance Case Number Reuse
<b>Suggested Distribution:</b>	Temporary Assistance Staff Staff Development Staff Child support Staff TOP/CAP Coordinators Employment Staff
<b>Contact Person(s):</b>	Temporary Assistance Bureau at 1-800-343-8859, extension 4-9344 Welfare to Work: WTWCM help mailbox at: wtwcmshelp@otda.state.ny.us
<b>Attachments:</b>	None
<b>Attachment Available On – Line:</b>	<input type="checkbox"/>

### Filing References

Previous ADMs/INFs	Releases Cancelled	Dept. Regs.	Soc. Serv. Law & Other Legal Ref.	Manual Ref.	Misc. Ref.
03INF-22		347.13(b) 350.4(a)(3) 352.31(a)(8) 369.3(a)(4) 381.7(d)			GIS 03 TAWMS009

### Section 2

#### I. Summary

This release provides guidelines for local social services districts on when temporary assistance case numbers can be reused and when a new case number must be assigned. Temporary assistance case numbers are used to provide a unique identifier to TA family units, and serve a variety of operational and administrative purposes in the management of public assistance

programs. In addition, they are also used by the IV-D program through its Child Support Management System (CSMS) to identify those TA cases that may be eligible to receive an excess child support payment and to determine who should receive such excess payment. Federal regulations require that excess child support be distributed to the person who is/was the caretaker of the child (ren) for the period of the excess support. Having multiple caretakers with the same WMS case number severely impedes the distribution of excess child support and the child support pass-through payment to the correct person.

## **II. Purpose**

This release is to provide the policy regarding the assignment of case numbers for Temporary Assistance (TA) cases, to ensure that an accurate record is maintained and made available with respect to the total amount of public assistance paid in an individual TA case.

## **III. Background**

TA is required by Federal Regulation to provide IV-D with information regarding the total amount of assistance paid to the family. IV-D is required to determine if more assigned support has been collected than the total assistance paid to the family, and if so, to notify TA of the amount of such excess support. Where total assistance paid to the family exceeds total assigned support collections, the difference is known as unreimbursed assistance, or URA. Most TA cases have URA, versus excess support.

Where a case is determined to have excess support, such amount must be distributed to the correct client within two business days of the end of the month in which the excess occurred. The distribution must be made to the person who is/was the caretaker of the child (ren) for the period of the excess support.

TA households are entitled to up to fifty-dollars of current support collected for a month. The head of household in the month that the current support was paid is the individual entitled to receive the child support disregard (AKA bonus payment or pass-through). This is true even though another person may be the head of household by the time the Support Collection Unit in the district where the TA family resides received the support.

By having multiple caretakers with the same WMS Case Number, severely impedes the ability to meet the requirements to provide excess support and the pass-through payment to the correct person.

The GIS message 03 TA/WMS009 that was issued April 24, 2003 partially addressed this problem.

## **IV. Program Implications**

The Child Support Management System (CSMS) stores the WMS TA Case Number on each child support client and child record associated with the Case Number. Based on files from Temporary Assistance, CSMS updates the amount of total assistance paid to the family

(including excess support payments previously issued by TA), and compares that amount to the assigned support collected on each associated IV-D case.

When a WMS Case Number is reassigned to a new TA household (e.g., an adult child of the original case applies for assistance), the amount of assistance paid is included in the total assistance that was paid to, and on behalf of, the original household. This causes the report of the amount of assistance paid to a specific household to be overstated and may result in the payment of excess support being withheld from the current and/or former client.

In addition, since the distribution of excess support payments and disregard payments is made based on the TA case number, reassigning an old case number to different members of the old assistance unit, or to individuals totally unrelated to the original case, may mean that an individual will receive an excess support payment or disregard payment that rightfully belongs to someone else.

Conversely, it is problematic when a family who has received TA in the past reapplies and instead of being assigned the original case number, is assigned a new case number. In these instances, assistance paid to the family under one case number or the other may be missed in the calculation of the total amount of assistance paid to the family.

The TA case number reuse policy described in Section V below is intended to address the issues. However, this limitation may cause a shortage of available case numbers under a LSSD's existing case number structure. LSSDs may need to add to the available case number pool by adding additional numbers, or by using letters in place of some numbers in the case numbers.

TA units in LDSSs must decide how to handle undercare cases that close under one case number and reopen under a new case number as a result of a new grantee. The application may be handled in undercare or intake as determined by the LDSS. LDSSs must be sure that the opening of the new TA case is from the day following the case closing of the previous case. There should be no interruption in benefits if the household continues to be eligible with the new caretaker.

## **V. Required Action**

### **A. Temporary Assistance**

Temporary Assistance may not re-use the TA case number except in the following circumstances when the former TA case number must be used:

- The same case Applicant/Payee (A/P) re-applies for TA for only his/her own self, or with at least one child from the original household.
- A single parent in a formerly intact (two-parent) family reapplies for TA if the applying parent has all of the children with him or her. The applying parent need not have been the case payee at the time the intact family received assistance. (However, if some children live with one parent and some live with the other parent, both cases must get new case numbers because the households in both cases have been changed.)

- A single parent in a formerly intact (two-parent) family reapplies for TA when the parents have joint custody of all of the children. The parent applying for TA may be assigned the former case number. If both parents apply, both must be assigned new case numbers.
- The same adults apply together for TA, with or without children.

TA must assign new case numbers for all other applying individuals and families, including adult applicants associated with an old case number in which the adult applicant received TA as a child. In addition, some cases, currently considered undercare cases, must have new case numbers assigned when the applicant/payee or non-TA grantee changes even if all other household members remain on TA. For example:

- In a three generation case:
  - When the parent of an age 18 through 20-year-old parent goes off of the TA case, the 18 through 20-year-old and her child must be given a new case number, unless the senior parent continues to be the payee.
  - When the parent of an under age-18 minor parent goes off TA but remains in the household, the senior parent would usually continue to be the payee, at least until the minor parent turns age 18. (18 NYCRR 369.3(a)(4) and 381.7(d).) If the senior parent cannot be the payee or refuses, the 16 or 17-year-old parent will be the payee and must be assigned a new case number.
- The TA Head of Household for TA recipient children changes.
- The new applicant/ payee (grantee) must complete the LDSS-2921, the “Statewide Common Application” whether or not applying for TA for him-or herself. The application is required by 18 NYCRR 350.4(a)(3). By signing the application, the new head of household assigns the support to those members of the TA household that may be entitled.

In districts that have separate undercare and intake units, either unit may handle undercare cases that must close under one case number and reopen under a new case number as a result of a new grantee. The LDSS may make that determination.

- The closing of the case under one case number and opening under a new number will mean a new authorization from-date for the case. Provided that the household remains otherwise eligible for TA, the TA authorization to-date can be the same as the authorization to-date of the recently closed case. This will be most convenient since the Food Stamps certification period may not be shortened. (See Section V.B)

In most instances, closing one case and the reopening another should result in no interruption in the children’s benefits, particularly when children are in the care of one non-legally responsible relative and go into the care of another non-legally responsible relative. There is no 45-day waiting period for children going from the care of one adult caretaker to another who, due to lack of relationship, or exhaustion of the state sixty-month time limit, causes the children to be Safety Net rather than Family Assistance.

**PLEASE NOTE:** A new application and the assignment of a new case number are necessary only for a permanent change in the grantee. For example, in a situation where the adult is caring for the children while the parent (or other caretaker) is temporarily absent, no new application or case number assignment is needed. A parent may be in substance abuse treatment and the grandparent (or several different relatives) may be providing care during the parent's absence. If that parent maintains the decision making responsibilities for the child and is expected to return, the parent is temporarily absent and the case remains the same except that the cost of the residential treatment is included in the TA budget (see 03 INF-22 "Temporary Assistance: Individuals in Residential Treatment Programs".)

B. Notices

Timely and adequate notice is required when a case will close and a new case will reopen with a new case number as required. The notice may be deemed adequate only if the former caretaker agrees to the closing in writing.

The notice must be appropriate to the situation. For example, if the former caretaker was on TA with the children and that caretaker has permanently left the household, the notice must say that Ms. Caretaker's case will close because she has left the household and the children will receive TA in another case. In this situation, the CNS individual reason codes are:

Upstate:

F60 "Left Household" for the caretaker and F66 "Will Receive PA in Another Case" for each such individual. The case level reason code is I92 "No Eligible Individual".

NYC:

The case level reason code is M68 "Will Receive PA in Another Case" and, at the line level, F60 "Left Household" for that individual.

C. Food Stamps

The assignment of a new case number to a household already in receipt of Temporary Assistance/Food Stamps (TA/FS) must not result in the shortening of the household's FS certification period, provided that household otherwise remains eligible for FS. Similarly, when a new non-TA grantee applies (or fails to apply) for TA for children formerly in the case of a different grantee, districts must separately determine the household's ongoing eligibility for FS. In Upstate districts, when the TA recipients in a Mixed FS case are assigned a new TA case number, the new TA case number should be recorded in the Mixed FS case.

D. Medicaid Implications

Eligibility is redetermined when a case number is reused. When eligibility for Temporary Assistance continues, a new 12 month period of eligibility can be authorized for Medicaid. New Medicaid continuous save dates will be generated with each redetermination, as is current practice.

## VI. Systems Implications

The Welfare-To-Work Caseload Management System (WTWCMS) enrollment and employment records are associated with the case number under which they were most recently stored. (An update of the schedule information does not change the associated case number.) In the situation where a PA case is closed and the household members are reopened using a new case number, an update will be necessary to Welfare-To-Work Caseload Management System (WTWCMS) enrollment or employment records that are in Confirmed status.

To ensure that the enrollment and employment records are associated with the correct case number, the worker must access the WTWCMS folders for the adult household members. The worker must then click on Enrollment or Employment on the bottom bar of the folder. The worker must then open any enrollments or employments in "Confirmed" status. He/she should then resave the enrollment or employment record. It is helpful to update the Update Reason, as this will cause an update to the enrollment or employment history screen as well.

## VII. Additional Information (Optional)

### A. Client Identification Number (CIN):

LSSDs must reuse CINs for individuals. Assignment of multiple CINs to an individual increases district case processing time because it raises questions regarding identity of the individual to whom multiple CINs are assigned. Correct identification of an applying individual may be more cumbersome when the individual moves between districts. Careful review of CINs will assure program integrity.

Clearance reports may lengthen as a result of non-reuse of case numbers. Therefore, LDSS workers should be trained to be very diligent to prevent a growth of duplication CINs.

### B. Case Number:

The same number with a different prefix or suffix is considered a new case number. However, the assignment of the prefix or suffix still requires that the old case is closed and a new case opened.

### C. Old Case Numbers:

In limited situations when it may be appropriate to use the same case number for a reapplying TA family, it may be difficult for the district to make that determination. For example, the family's previous TA record was destroyed because the period for mandated record retention expired. When there is doubt about whether it is appropriate to assign the same case number, assign a new case number.

### D. Referral to IV-D:

With a new case number, a new Child Support Enforcement Referral (LDSS-2860) is required. This is true even if IV-D already had a previous referral on all absent parents under the old case number.

### **VIII. Effective Date**

This directive is effective as of the date of issuance for all applicants and affected undercare cases; except that undercare cases which require the assignment of a new case number must be given a new case number only if the change occurred on or after the effective date of this release.

**Issued by:** \_\_\_\_\_

**Name:** Russell Sykes  
**Title:** Deputy Commissioner  
**Division/Office:** Division of Employment and Transitional Supports