

A stylized, colorful illustration of a landscape. The background features wavy, layered bands of light blue and white, suggesting a sky or water. In the foreground, there are rolling green hills with brown soil patches. On the left, there is a green tree, a purple flower, and an orange butterfly. A small red bird is flying in the upper left. The overall style is flat and modern.

Road to Successful Case File Reviews

CSBG Conference May 2017

**BCAEO Programmatic Monitors
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Programmatic Monitoring involves reviewing several areas to assess the health of an entire agency.

This includes:

- **Administrative Policies**
- **Tri-Partite Boards**
- **BCAEO funded program case file reviews**

This session will primarily focus on BCAEO funded program case file reviews:

- **Identify areas with most common errors**
- **Outline road to success tips for building correct case files**
- **Benefits of a strong case file**

Administrative Policies

Programmatic Monitors ensure CAAs have policies in place that address language contained in the MDHHS CSBG Contract. These policies can originate from the CSBG Act, Informational Memorandums, Federal Partners, State of Michigan legislation, CSPMs or MDHHS requirements.

Tri-Partite Boards

Programmatic Monitors review specific criteria in addition to the Organizational Standards review such as seat vacancies, meeting requirements and quorums.

How do case file reviews affect Programmatic Monitoring results?

- **The most commonly identified errors occur during the review of program case files.**
- **If the same errors are identified year after year, they can build from a Concern to an Administrative Recommendation to a Finding.**
- **This could result in a targeted monitoring review, Corrective Action Plan, or Technical Assistance Plan.**

Removing the Roadblocks- Identifying the most commonly found errors

- **Not using the Community Services Program Manuals**
- **Missing documentation**
- **Documents without signatures or dates**
- **Lack of case notes**
- **Incorrect Asset Eligibility Determinations**
- **Incorrect Income Eligibility Determinations**
- **Incorrect income computations (FACSPRO)**
- **Case file building documents not uploaded**

What if my CAA is providing case management services and not specific assistance programs?

As part of the comprehensive service delivery/bundled services approach, CAA staff should consider many of the same steps outlined in this session.

Strong internal controls such as processes and procedures of conducting intake and gathering applicant information should apply to all programs.

Why is a holistic intake approach beneficial to an applicant or the CAA?

In looking at the big picture for case management, a thorough intake could:

- Help identify other CAA programs, not just CSBG, that a household qualifies for.**
- Remove barriers and increase efficiency for applicant.**

Possible barriers for Applicants:

- **Transportation – no money for bus, no vehicle**
- **Health related issues – personal or family member**
- **Missing work – no pay for time off, lose job**
- **Requesting information more than once from same source**
 - **resistance from employer or source,**
 - **applicant doesn't keep vital information**

Realistically there may be times when more recent information is needed at a later date.

Case File Building Basics

At intake gather all relevant documentation pertaining to the applicant/household:

- ✓ **Household composition**
- ✓ **Asset verifications**
- ✓ **Income verifications**
- ✓ **MDHHS Benefit Program documentation if received by applicant or household members**
- ✓ **Release of Information**

Why is it important to collect information such as Non-Cash benefits like Food Assistance?

- **If a household receives FAP and is considered Automatically Asset Eligible for CSBG funded programs, it eliminates the need of providing additional asset verifications. (Removes a barrier for the client!)**
- **All information entered in FACSPRO should be supported since FACSPRO is a statewide database.**

For example: A CAA reports that 60% of the households served received an MDHHS Program benefit such as Food Assistance. How is the data supported without documentation?

Roadblock #1 – Community Service Program Manuals (CSPMs)

What are the risks for not using the CSPMs?

- **Incorrect case file reviews - more time spent on correcting or updating case files instead of helping customers**
- **Missing required documentation - additional time spent contacting customer and gathering appropriate documents**
- **Administrative Recommendations**
- **Disallowed Cost repayments**

Roadblock #1 – Community Service Program Manuals (CSPMs)

For CSBG funded programs CAA staff should be familiar with:

- **Household composition and income eligibility determination requirements (CSPM 502),**
- **Household composition and asset eligibility determination requirements (CSPM 508)**
- **Case file information should be uploaded to FACSPPro (CSPM 909).**

Accessing and understanding the CSPMs will prevent most errors.

Remove the Roadblock #1 – Community Service Program Manuals (CSPMs)

Road to Success tips:

- ✓ **Open the CSPMs for easy access**
- ✓ **Use the most recent CSPM Overview Guides, tools, and resources located in FACSPRO Documents Center**
- ✓ **Consider in-house CSPM trainings**
- ✓ **Consider establishing agency policies**
- ✓ **Create program specific checklists using CSPM main points**
Example: household size, application date, eligibility date, income verifications, asset verifications, etc.

Roadblock #2 – CSPM 508 Asset Eligibility Determinations

- **Available assets from all household members are considered when determining asset eligibility.**
- **A household is all persons occupying a housing unit, regardless of whether they are related.**
- **Assets must be considered in determining eligibility for services provided with CSBG funds.**

See CSPM 508 for Automatic Asset Eligibility requirements.

Roadblock #2 – CSPM 508 and 909 Asset Eligibility Determinations

What are the risk areas for asset eligibility determinations?

- **Not asking for the entire household's assets, including children.**
- **Not collecting a completed, signed, and dated CSBG Asset Eligibility Determination checklist (used by most CAAs).**
- **Not obtaining verification of receiving MDHHS Program benefits for Automatic Asset Eligibility.**
- **Not gathering declared asset documentation.**
- **Not looking at household members outside of automatic eligibility group.**

Remove the Roadblock #2 – CSPM 508 and 909 Asset Eligibility Determinations

Road to Success tips:

- ✓ **Is a completed Asset Eligibility Checklist in file and inclusive of all household members, including children?**
- ✓ **Is Asset Eligibility Checklist signed and dated by agency representative and customer?**
- ✓ **Does the household meet the **Automatic Asset Eligibility** criteria?**
- ✓ **If a household is receiving an MDHHS Program benefit, is there documentation such as a letter or email from MDHHS case worker?**
- ✓ **Does the MDHHS letter contain the following information: client name, household size, amount of benefits received, current timeframe?**
- ✓ **Does the case file contain verification of all household assets?**

Roadblock #3 – CSPM 502 Income Eligibility Determinations

- **Income from all household members is used to determine income eligibility.**
- **A household is all persons occupying a housing unit, regardless of whether they are related.**

Refer to policy when a household has Foster Children or Absent Household Members over 90 days or a Roomer.

NOTE: **Applicants must meet specific criteria in CSPM 502 to be considered a Roomer.**

Roadblock #3 – CSPM 502 Income Eligibility Determinations

What are the risk areas for income eligibility determinations?

- **Not collecting the entire household's income, including children.**
 - **See income exclusions for children 18 and under; document whether 18 year old is still attending school.**
- **Not collecting enough information for a 3-Month lookback period.**
- **Lack of case notes detailing income discrepancies or changes.**

Roadblock #3 – CSPM 502 Income Eligibility Determinations

What are the risk areas for income eligibility determinations?

- Self-Declarations of Income not notarized and/or not containing evidence of the *various attempts at proving eligibility*.
- Self-Declarations of Zero Income for *entire* household not notarized and/or missing the approval by MDHHS BCAEO staff in the client file.

Remove the Roadblock #3– CSPM 502 Income Eligibility Determinations

Road to Success tips:

- ✓ **Obtain income information for all household members for a 3-Month lookback period including State SSI Supplemental Payment documentation**
- ✓ **Develop relationships with local MDHHS Offices – MDHHS case workers can confirm via email receipt of MDHHS benefits and the State SSI Supplemental payment information.**
- ✓ **Ask questions if there is discrepant information and document conversation**

Remove the Roadblock #3– CSPM 502 Income Eligibility Determinations

Road to Success tips:

- ✓ **Self-Declarations of Income:**
 - **Document what steps were taken to gather the information or note why information is unavailable**
 - **Notarize Self-Declarations of Income**
 - **Include the 3-Month lookback period dates**

Remove the Roadblock #3– CSPM 502 Income Eligibility Determinations

Road to Success tips:

- ✓ **Self-Declarations of Zero Income for an *entire* household**
 - **Notarize Self-Declaration of zero income**
 - **Include 3-Month lookback period dates**
 - **Obtain BCAEO Grant Manager approval for entire households declaring zero income**
 - **Place a copy of approval in case file**
 - **Ask questions – how are you paying for utilities, food, shelter?**

Roadblock #4 – FACSPRO Income Computations

What are the risk areas for income computations?

- **Dates entered not aligning with application date**
- **Using different time periods instead of 3 Month lookback**
- **Not computing income using Annual option**
- **Not completing the Income Worksheet Screens**
- **Certification dates missing**
- **Missing pay information**
- **Missing case notes explaining what income was used and why**
- **Using pay period end dates instead of actual pay dates**

Remove the Roadblock #4 – FACSPPro Income Computations

Road to Success tips:

- ✓ **Use the DBA FACSPPro CSBG Income Entry Guide found in FACSPPro Documents Center**
- ✓ **Enter correct date of application**
- ✓ **Use 3-Month lookback period from application date**
- ✓ **Enter case notes to explain what information was used and why if there is missing or discrepant information**
- ✓ **Enter certification date**

Roadblock #5 – CSPM 502 and 909 Case File Documentation

What are the risks for missing case information?

- **Incorrect case file reviews**
- **Question accuracy of eligibility determinations**
- **Could result in Administrative Recommendations or Findings**
- **Could result in disallowed costs to be paid back to BCAEO**
- **Could result in targeted program review**

Remove the Roadblock #5 – 502 and 909 Case File Documentation

Road to Success tips:

- ✓ **Consider an agency process requesting applicant to bring required documentation to an appointment.**
- ✓ **If mailing an application, consider an agency process to include a checklist of required documents to be returned with the application.**
- ✓ **Consider an agency process to follow-up to faxed or mailed in applications.**
 - **If an applicant mails or faxes in an application- follow up with a phone call to review information or accuracy.**
 - **Sign application/FACSPRO Customer Report.**

Remove the Roadblock #5 – 502 and 909 Case File Documentation

Road to Success tips:

- ✓ **Document conversations, including phone calls.**
 - **Phone call documentation should include: time, phone number, and name of person spoken to.**
- ✓ **If applicants complete an application and a Customer Report is printed at a later date, staff should sign and date Customer Report and add a note.**

Remove the Roadblock #5 – CSPM 502 and 909 Case File Documentation

Road to Success tips:

All Applications or Customer Reports are required to be signed and dated by an applicant and agency representative.

Example 1: Customer Report printed per CSPM requirements, applicant signature on paper application, entire application uploaded.

Example 2: Income information updated due to case file review, customer signature not necessary.

Example 3: Customer called in to provide more information, entered into FACSPPro – see notes section.

Roadblock #6 – CSPM 502

Timeframe between Eligibility Determination and Service Provided

What are the risks in relation to providing services and timeframes?

- **Services not provided within 30 days of the initial eligibility determination**
- **Missing documentation of services needed**
- **Missing voucher or payment information to substantiate CSBG funding spent**
- **Not following CSPM 502 requirements when additional services are requested**

Remove the Roadblock #6 – CSPM 502

Timeframe between Eligibility Determination and Service Provided

Road to Success tips

- ✓ **Add verification of services needed to case file documentation**
- ✓ **If services cannot be provided within 30 days, document the reason (classes, workshops, etc.)**
- ✓ **Include documentation to support the amount of specific assistance dollars spent assisting applicant/household**
 - **Copy of Voucher or payment information**
- ✓ **For additional services, document in case notes steps taken and additional information obtained as applicable to ensure accurate eligibility determinations outlined in CSPM 502**

Roadblock #7 – CSPM 909

Uploading Case Building File Documentation to FACSPRO

What is the risk for not uploading case file information?

- **Incorrect case file reviews**
- **Question accuracy of eligibility determinations**
- **Could result in Administrative Recommendations or Findings**
- **Could result in disallowed costs to be paid back to BCAEO**
- **Could result in targeted program review**
- **Inefficient use of staff time to correct or update case files**

Remove the Roadblock #7 – CSPM 909 Uploading Case Building File Documentation to FACSPPro

Road to Success tips:

- ✓ **Upload entire case file and case file building documentation to support eligibility determinations**

Why?

- **Electronic documents must be attached to FACSPPro for all programs administered by BCAEO.**

Additional Road to Success Tips:

- ❖ **Build strategic relationships with local MDHHS Offices – Partnering with MDHHS can increase efficiency for CAA Staff and reduce barriers for clients.**
 - **MDHHS case workers can confirm via email receipt of MDHHS benefits and the State SSI Supplemental payment information.**
- ❖ **Review a CSPM at staff meetings**
- ❖ **Incorporate in-house staff trainings for CSPMS and FACSPRO entries**
- ❖ **Develop mechanisms for internal case file reviews such as a Peer to Peer review**
- ❖ **Check FACSPRO Documents center regularly to ensure tools and resources are still current**

BCAEO Funded Migrant Programs Only

BCAEO issued a clarification February 15, 2017 regarding Self-Declarations of Income and Assets for Migrant Programs because of the unique circumstances surrounding this population.

The asset clarification is as follows:

- **Self-Declarations of Assets for Migrants may be used to capture asset information in conjunction with a CSBG Asset Eligibility Checklist as a last resort after all other options have been exhausted.**
 - **The documentation must be uploaded into FACSPRO as part of the case file. (CSPMs 508 and 909)**

BCAEO Funded Migrant Programs Only

The income clarification is as follows:

- **Notarized Self-Declarations of Income for Migrants may be used to capture income information as a last resort after all other options have been exhausted.**
- **Because Self-Declarations do not require income documentation, it is not necessary to complete the income information in FACSPRO (for Migrant Programs only).**
- **The documentation is required to contain case notes of why the Self-Declaration was used by CAA Staff and uploaded into FACSPRO as part of the case file.**
- **The annualized income must adhere to CSBG FPL guidelines. (Refer to CSPM 502 and CSPM 909.)**

BCAEO Funded Migrant Programs Only

What does the income clarification mean?

If the Migrant household cannot provide documentation for a 3-Month lookback period and a notarized Self-Declaration of Income is utilized, the following steps should be taken:

- **Calculate the annualized income computation by hand with detailed notes explaining source of income, timeframes without income and how the final computation was figured.**
- **Upload pay information, calculations and notes**

Note about CAA Monitoring and Training for Subcontractors

- **When CAAs subcontract programs utilizing BCAEO funding, the CAA is responsible for conducting a risk assessment and monitoring of each subcontractor.**
- **CAA training of subcontractors will provide assurances to BCAEO that the subcontractor is in compliance with MDHHS and CAA Contracts, CSPM Policy requirements, and program eligibility determinations.**
- **Programmatic Monitors may ask for copies of reports, SOEs, documented trainings, and review case files as a part of the monitoring process.**

Tools & Resources

Currently many tools and resources are located in DBA FACSPRO Document Center such as:

- **DBA FACSPRO CSBG Income Entry Guide**
- **DBA FACSPRO Weatherization Income Entry Guide**
- **DBA FACSPRO Document Center Overview**
- **CSBG Asset Eligibility Checklist (FY17)**
- **CSBG CSPM Income Eligibility Overview (FY17)**
- **CSBG Asset Overview (FY17)**
- **Weatherization CSPM 601 and 701 Income Overview (FY17)**
- **LCA-LIHEAP CSPM 1101 Overview (FY17)**
- **3-Month Lookback Calendar Non-Leap Year**
- **3-Month Lookback Calendar Leap Year**
- **LCA-LIHEAP 30 Day Calendar Leap Year**
- **LCA-LIHEAP 30 Day Calendar Non-Leap Year**

Training Opportunities

If your CAA is interested in training for BCAEO funded programs, please let us know.

- Request training during the Programmatic Monitoring Review.**
- Executive Directors can request training through BCAEO Director, Grant Managers or Programmatic Monitors.**

Training will generally be scheduled during the Fall season.



Questions or Comments?