

Department of Social and Health Services
Olympia, Washington
EAZ Manual

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Category Mid Certification Reviews
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Summary

Updated clarifying information and worker responsibilities under **WAC 388-418-0011** to address updated ESAP certification periods. Also made minor cosmetic changes (e.g., correcting numbers and spacing).

Updated January 31, 2024

See below for edited text:

Mid Certification Reviews

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WAC 388-418-0011 What is a mid-certification review (MCR), and do I have to complete one in order to keep receiving benefits?

- [Clarifying Information](#) and [Worker Responsibilities](#)

NOTE: ~~Cash and food assistance Mid-Certification Reviews normally due in January through June 2022 have been waived and households will not need to complete MCRs during this timeframe.~~

Clarifying Information - [WAC 388-418-0011](#)

1. A mid-certification review (MCR) is:

- a. A request to confirm ~~your~~ current circumstances or report changes to determine if ~~you are still eligible~~ [continued eligibility](#) for benefits and to calculate ongoing monthly benefits;
- b. Due six months into ~~your~~ [a](#) 12-month certification period unless:
 - i. ~~Your~~ [The](#) assistance unit has a certification period six months or less, or
 - ii. [All](#) adults in ~~your~~ [the](#) assistance unit are elderly or disabled and have no earned income.
 1. [Basic Food cases in a 36-month certification, period originally certified as ESAP, will have MCRs for the remainder of the certification period due in months 12 and 24. See *Elderly Simplified Application Project \(ESAP\)*](#)

2. Review items for MCR:

The requirements for the MCR vary by program. See below for elements that must be reviewed and updated, if changes have been reported:

Cash	Basic Food
Address	Address
Deductions: legally obligated child support	Deductions: <ul style="list-style-type: none"> • Child support; • Shelter expenses (only if moved); and • Medical and child care expenses if applicable.
Disability	
Household Composition	Household Composition
Income	Income (new source, start, stop, change in rate or hours)
Pregnancy	
Resources	

Note: Don't address LAM during the MCR process. See [Verification](#) section.

Note: Documents received after the close of business are marked as being received the next business day.

3. **For MCRs with conflicting, missing, or previously unknown information:**

- a. MCRs are either complete or incomplete. Make every attempt to clarify conflicting or incomplete information.
- b. Consider the MCR complete even with blank section if there is **no conflicting information** on cross matches.
- c. Resolve information reported on the MCR that conflicts with data cross matches before considering it completed.
- d. The MCR is considered incomplete until we have all necessary information to determine eligibility for month seven and beyond.
- e. For CSD users, see CSD Procedure Handbook for MCRs.

EXAMPLE:

Mozzie's MCR is due the end of May. He lost his MCR form, but finds an ER online and submits that instead. Mozzie says he is still only working 10-15 hours per week (no change in income). He also checks the box on the ER form stating he is a student, but doesn't explain or indicate the type of school and how many credit hours he is taking (full time or less than half time). The worker tries to call Mozzie to clarify his student status but he isn't available. Since Mozzie doesn't qualify for student exemption factors and isn't working at least 20 hours per week, the worker must mark the MCR incomplete and terminate benefits. The worker adds some free-form text on the termination letter to inform Mozzie that he must contact us to clarify his student status.

EXAMPLE:

Jason provides a completed Basic Food MCR form early in the sixth month. Jason reports no income and no changes. Spider shows Jason has earnings from a previously unreported source in the most recent work quarter. (Income indicated is significantly less than 130% of FPL times 3 months.) The worker attempts to call Jason but is unable to reach him.

Staff process the MCR as incomplete, add documentation to the case explaining why, and send a MCR termination letter requesting clarifying information regarding current employment status.

Jason comes into the local CSO in the middle of the sixth month to report that he no longer works for the company indicated and received his final check two months ago. Since earnings weren't previously budgeted, verification of employment loss isn't required as there is no currently budgeted income to remove.

Worker accepts Jason's statement, reinstates food benefits, and marks the MCR complete.

4. **Required proof for the MCR:** We don't require proof of an increase in income deductions change unless it's questionable. The verification a recipient must provide to count an MCR as complete depends on the benefits they receive.

a. **For Food MCRs:**

- i. If the recipient's reported deduction isn't questionable, allow the increased expense. If you have all other mandatory verifications, treat the MCR as complete.
- ii. If the deduction is questionable (for example; client reports household rent has gone up from \$800 per month to \$1600 per month), don't allow the increased expense without verification. If you have all other mandatory verification, treat the MCR as complete and add text to the letter informing the person to provide verification of the change if they want it to be counted for benefits. Leave the old deduction amount (if any) as is until the next eligibility review (ER) or until verification is provided.
- iii. The recipient doesn't have to answer questions about pregnancy, individuals with disabilities, health insurance, cash resources, vehicles, or utility costs. These questions aren't included on the Food-Only version of the MCR ~~which is~~ mailed to Basic Food and FAP households not receiving any cash benefits that require an MCR.
- iv. There is no requirement to provide verification of reported changes before we act on the changes unless there is a change in income that will increase the Basic Food/FAP benefit. If the recipient doesn't provide verification of income that will increase the benefit don't make the income change. The benefit continues at the current amount, and verify the income change during the next recertification.
- v. If the recipient is exempt from Work Registration due to this income that may change their exemption status. We must take action to determine the recipient's Work Registration status.
- vi. If a mandatory ABAWD participant reports this change, we must determine if the reported changes will impact their participation status.
- vii. If there isn't enough information to determine Work Registration or ABAWD participation status, we must send a request for information.
- viii. The recipient has the option to complete the MCR process by using the Food-Only MCR form with questions relating to food benefits only or the multi-program MCR form and only answer the questions needed for the food benefits.
- ix. Information reported that isn't required for the MCR should be processed as part of the MCR effective in month seven if the MCR has been submitted timely (before benefits are closed for no MCR)

NOTE:

When an MCR includes both an unverified change resulting in decreased benefits **and** an unverified change causing an increase in benefits, act upon the change causing the decrease without verification, but don't make the

change to increase benefits if verification isn't provided with the MCR. See [Effective Date - Change of Circumstances](#)

EXAMPLE:

Cheyenne's MCR is due in July. They provide an MCR on 7/18 and report both a job quit and new job, without verifying the end of the old job. Cheyenne's MCR is processed and August benefits are determined using both the newly reported income **and** the existing income from the previous job as the income decrease isn't verified. The MCR is complete and the worker includes canned text *MCR05 – Food \$ Decreased not verif* indicating the reported decrease in income wasn't processed as the change wasn't verified.

b. For Cash MCRs:

- i. The form instructs the recipient to verify the changes they tell us about on the MCR, except increases in deductions. If they don't include the verification with the MCR, consider whether the change affects benefits or is questionable before deciding whether the MCR is complete or incomplete.
- ii. If the recipient's reported deductions aren't questionable, allow the increased expense. If you have all other mandatory verifications, treat the MCR as complete.
- iii. **If the deduction is questionable**, don't allow the increased expense. If you have all other mandatory verification, treat the MCR as complete and add text to the letter informing the person to provide verification of the change if they want it to be counted for benefits. Leave the old deduction amount (if any) as is until the next eligibility review (ER) or until verification is provided.
- iv. Adult recipients of TANF must give us proof of their income even if their income hasn't changed.
- v. For a child-only TANF grant, the non-needy members don't have to provide proof of their income.
- vi. If the recipient **reports no changes** for Basic Food and TANF and didn't give proof of their income, process the MCR as complete for Basic Food and incomplete for TANF.
- vii. Additional information reported that isn't required for the MCR should be processed as part of the MCR effective in month seven if the MCR has been submitted timely (before benefits are closed for no MCR).

NOTE:

Even though we don't require TANF households to verify employment hours as a condition of eligibility, we **must** still verify and record employment hours. See [Income Budgeting](#) for information on how to record income and employment hours for TANF households.

EXAMPLE:

Bill's MCR is due in June. Sandy, his WorkFirst worker verified his income and hours of work in April when Bill reported that his hours were reduced. If Sandy verified the income and hours to impact June benefits, we **don't** need to re-verify this information to complete the June MCR. If she verified the income and hours to impact an earlier month, we **must re-verify** the income and hours to complete the June MCR for TANF.

5. **Applications or Eligibility Reviews (ER) received in the sixth month:**

- a. Process the form as an MCR as described under [WAC 388-418-0011](#).
- b. If extra information is reported (more information than is required for an MCR) then treat this information as a change of circumstance and consider the impact on benefits and the effective date of the change using adverse action/adequate notice rules under [WAC 388-418-0020](#).
- c. Don't require the household to provide any more verification or information than is required for an MCR.

EXAMPLE:

Bob's MCR is due the end of May. Bob lost the MCR form mailed to him but finds an ER online and submits that instead. The ER is received on May 26th. The worker reviews the information on the ER and determines all items needed to complete the MCR are present and the worker marks the MCR as complete. Bob reported a change in his student status. The change isn't questionable so the worker makes the change and processes this action as a change of circumstance effective July 1st.

NOTE:

If you approve an application on a related AU *after deadline* for the month an MCR is due, the benefits covered in the MCR **will still close**. Even though processing the application meets the requirement for the review, you must also reinstate the benefits that closed for no MCR.

6. **MCRs completed late:** If someone doesn't complete the MCR on time, ACES closes the benefits at the end of the sixth month (month MCR is due). We treat MCRs completed after the sixth month as described below:

- a. **Completed by the last day of the seventh month:** Process the MCR to determine ongoing eligibility for benefits and reinstate benefits if appropriate.

EXAMPLE:

Dee receives her MCR for Basic Food and TANF due on August 10th. She doesn't complete the MCR as required. Dee's benefits end on August 31st. On September 8th, Dee completes her MCR over the phone and her worker gets proof of the changes she reports. Her worker reinstates Basic Food and TANF benefits effective September 1st.

NOTE:

If the household submits an Application for Benefits or an Eligibility Review by the last day of the seventh month and no other assistance program is being requested, you may treat the Application or Eligibility Review as an MCR. If additional programs are requested see #7.

- b. **Received later than the seventh month:** Document when you received the MCR and send the recipient an application for benefits.

EXAMPLE:

The Smiths have an MCR due on January 10th. They don't return the MCR form or complete the MCR over the phone. ACES closes Basic Food on January 31st. On March 4th, Mr. Smith turns in an MCR stating that there were no changes in their circumstances. He has also attached proof of their income. Because they completed the review later than the end of February, we treat the MCR as a request for an application and send them a new application. The AU isn't eligible for benefits for February. To receive benefits, the AU must complete the application process as described under [chapter 388-406 WAC](#).

NOTE:

Documents received on a weekend or holiday are considered received the following business day.

EXAMPLE:

Rick's MCR is due on October 10th. He doesn't return the MCR timely or complete it over the phone. Basic Food benefits close on October 31st. Rick submits the MCR through Washington Connection on November 28(Thanksgiving). The next business day is December 2nd, therefore, he must reapply for Basic Food.

7. Applications or Eligibility Reviews received in the seventh month, [or annually for cases with a 36-month certification period](#):

- a. Process the form as an MCR as described under [WAC 388-418-0011](#). All information reported on the ER must be acted on even though the information may not be an MCR reportable item.
- b. Don't require the household to provide any more verification or information than is required for an MCR.
- c. The household may specifically request we treat the application or ER as a new application for food. There is no need to contact the household to ask how it wants to treat the application/ER if a responsible person in the household hasn't already requested this in writing or verbally.

- d. Expedited services can be considered if treated as a new application. ACES should set a new, 12-month certification period.
- e. See ACES PROCEDURES for information on screening the application or eligibility review if we treat the document as a new application.

NOTE:

If someone wants to complete the application process, or we can't complete the MCR with the information we have available, we must act on the application for benefits.

8. **Requests to add a person on the MCR:** The MCR asks about people moving into the household and whether or not they want benefits for this person. See below to decide if you need an application or Eligibility Review (ER) form to add the new person to the current benefits:

Cash Assistance	<p>If someone wants to complete the application process, or we can't complete the MCR with the information we have available, we must act on the application for benefits.</p> <ul style="list-style-type: none"> • For cash, the responsible adult members of the AU must sign the application or ER. • We don't need a new application or ER form to add a child to a TANF/SFA AU.
Basic Food	<p>We don't need a new application or ER form to add someone to the AU unless it's required for another reason (such as a disqualified ABAWD participant attempting to requalify).</p>

9. **Requests to add a program or program change on the MCR:** For all programs, a recipient must complete a new application or ER form to add a program. When recipients report changes that makes them ineligible for the active cash program but eligible for another cash program, verify the change and process the cash program change without a new application or ER form unless it's required for other reasons. See CSD Procedure Handbook – Change of Circumstances Processing (For staff only) for procedures.

Examples: Mary is receiving ABD and reports that her 9 year old child has moved back into her home. Mary meets all eligibility requirements for TANF. Verify that the child returned to Mary's home and terminate ABD with advance and adequate notice. Screen in a TANF AU using procedures found in CSD Procedure Handbook – Change of Circumstances Processing (For staff only).

Using the same scenario as above but Mary reports that the child's father, Robert, also moved back into her home. Since we are also adding an adult to the assistance unit, an application or ER form will be needed with the signatures of all responsible adult members of the AU. Please see the table in #7 above for more details about when an application or ER form is needed.

10. **Completing the MCR over the phone:**

- a. You don't need a signed MCR form to count the MCR process as complete as long as you review the following with the recipient:

By completing this Mid Certification Review over the phone you're stating the information you gave is true, correct and complete to the best of your knowledge. You know the information given may stop or reduce your benefits. You know it is a crime to incorrectly receive cash or food benefits by making a false statement on purpose or failing to report something you knew you should report. You understand if you provide information you know is incorrect, you could be criminally prosecuted. You understand penalties for intentionally breaking food assistance rules include disqualification, fines or imprisonment. You understand if you don't provide proof of income changes that increase your benefits for cash or food assistance, changes won't be used to determine your benefits.

- b. It is a federal requirement for the SNAP periodic reporting (MCR) process to have the recipient acknowledge understanding of the statement above either by signing a form with the statement on it or providing verbal acknowledgment after the statement is read to them. Document that the recipient acknowledged their understanding. A signed MCR Statement of Understanding form isn't required to complete the MCR when an application or eligibility review is used in place of the MCR.

11. **MCRs completed in the local office:** We process MCRs completed in the local office based on the way we receive the report:

- a. **Completed Forms:**
An MCR form completed on paper or electronically is processed the same way we would process one received by mail or fax. The recipient must sign the form to acknowledge that they understand the information they provided for the MCR may reduce or stop their benefits.
- b. **In Person Reports:**
The in-person verbal report can't be used to complete the MCR requirement unless they also complete and sign the Statement of Understanding Form 02-611 or a copy of the MCR form printed from Barcode. The MCR Statement of Understanding form isn't required when a signed application or eligibility review is used in place of the MCR form.

[For information on when a former ESAP client is required to submit annual MCRs, see *Elderly Simplified Application Project \(ESAP\)*.](#)

1. **Working alerts, Barcode tickles, and checking other systems as part of processing the MCR:**

To reduce the risk of payment errors, work related Alerts in ACES, Barcode tickles, and review systems such as SEMS as appropriate to ensure that the income you budget is based on the best available information.

NOTE:

Households don't have to report changes in the amount of their child support payments between application and MCR. However, we **must** update this information as a part of completing the MCR. When working on an MCR for a case that could have child support income, be sure to check SEMS for recent payment information to determine what would be appropriate to estimate as income for ongoing months.

ACES PROCEDURES

- See Eligibility Review / Recertification Process - Mid-certification reviews.