DSS ADMINISTRATIVE LETTER NO. ECONOMIC AND FAMILY SERVICES 2-2016 FNS Program Integrity (February 23, 2016)

(Food and Nutrition Services)

TO:	County Directors of Social Services
ATTENTION:	Food and Nutrition Services Managers and Supervisors and Program Integrity Supervisors
DATE:	February 23, 2016
SUBJECT:	Enterprise Program Integrity Control System (EPICS) Issues

EFFECTIVE: February 23, 2016

I. General Information

The purpose of this letter is to communicate important information regarding the Enterprise Program Integrity Control System (EPICS).

II. EPICS Issues

- a. ALL FNS Referrals with overpayment periods that extend over multiple Product Delivery Cases (PDC) that cannot be entered into EPICS as one claim need to be faxed to the State office at 919-334-1265 to request an override. This will avoid multiple claims and multiple Letters of Overissuances being created for one overpayment.
- b. Treasury Offset Program (TOP) blocks and unblocks have been updated in EPICS per county requests. Continue to submit requests based on the client's situation. For those individuals who were erroneously intercepted in TOP and the correct block has been updated, once the interception posts to EPICS it will automatically display as an over collection and will generate a refund to the client. This process could take up to 6-8 weeks for the client to receive the refund. Please do not have clients call the State office inquiring about refunds within the 6-8 week timeframe.
- c. The FNS repayment agreements that EPICS changed to void are in the process of being corrected. The information that was in EPICS prior to January 4, 2016 will be restored to the Repayment Agreement screen, as "grandfathered-in" agreements. EPICS will only allow one repayment

agreement per claim. FNS claims that have multiple debtors with multiple FNS repayment agreements prior to January 4, 2016 in EPICS will only populate data from the repayment agreement amount that has the lower monthly payment. The two repayment agreement amounts will not be rolled up into one. As long as the lower monthly payment amount is being paid the debt is not considered delinquent and neither debtor will be certified for TOP even if only one debtor is paying. Once the county attempts to update any field for these "grandfathered-in" repayment agreements, the new rules for repayment agreements will be invoked in EPICS, possibly requiring a higher repayment amount.

- d. Repayment Agreements without a Sign Date in EPICS prior to January 4, 2016 will not be restored in EPICS. If there is a signed repayment agreement in the file but the Sign Date was not entered in EPICS, the repayment agreement information will have to be manually reentered. If the agreement is not within the guidelines in "e" below a copy of the repayment agreement will need to be faxed to the State for an override of the system. If there is no Signed Repayment Agreement no repayment data may be entered.
- e. Delinquency and repayment arrangements are determined by debt, not debtors. Based on this, beginning January 2016 only one repayment agreement per claim will be allowed in EPICS. When entering the FNS repayment agreement make certain to enter the date the agreement was signed. The amount of the payment per claim should be the claim amount divided by 36 months, but not less than \$25.00 per month. In cases of hardship the payment period may be extended to 60 months but will require a request be faxed to 919-334-1265 at the State for a system override.

When individuals have multiple FNS claims with multiple repayment agreements they are responsible for paying on the oldest repayment agreement first, with payment being applied to this claim. If the repayment agreement amount for the oldest claim is being paid then no other debtor or claim will be considered delinquent and will not be certified for TOP.

When requesting a block for a debtor that has multiple claims, the request must include all claim ID numbers. Each claim is a separate debt and will be certified for TOP if it is delinquent and not blocked.

f. Clients are given a specific date of the month to make their payment and advise them that if the payment is late they are delinquent and subject to TOP interception. All payments must be posted immediately upon receipt. Failing to post a timely payment could be perceived as a late payment, and the individual could be considered delinquent.

III. Implementation Instructions

This change is effective upon receipt. Counties must begin the new repayment process above immediately.

If you have any Program Integrity questions, please send them to <u>dss.energy.pi.questions@dhhs.nc.gov</u>.

Sincerely,

Lauid Locklear

David Locklear, Chief Economic and Family Services Section

DL/bm