



STATE OF MICHIGAN
**Department of
 Health and
 Human Services**

Memorandum

Economic Stability Administration
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ESA Memo 2019-23 (revised)

To: BSC Directors
 County Directors
 District Managers

Date **October 17, 2019**
Revised **October 23, 2019**

From: Terrence M. Beurer, Director, Economic Stability Administration (ESA)

Subject: Asset Changes Effective December 1, 2019 (Revised 10-23-19)

The Department is committed to making it easier for Michiganders in need to access our benefits and easier for Department staff to do their work quickly and accurately. Simplifying our procedures is one important way to advance these goals. As a key step forward, the Department is introducing changes to asset limits for the Food Assistance Program (FAP), CASH (FIP, SDA, RCA) and State Emergency Relief (SER).

Asset limits will be increased and aligned for the following programs:

- For Cash (FIP, SDA, and RCA), the liquid asset limit will increase to \$15,000. The real property asset limit will remain the same at \$200,000.
- For FAP cases meeting Broad Based Categorical Eligibility (BBCE), the liquid asset limit will increase to \$15,000. Additionally, we will no longer consider any vehicle as a countable asset.
- For SER, the liquid asset limit will increase to \$15,000. Non-cash asset limit will remain the same.

The Department is also changing the processes for verifying assets. For Cash, FAP, and SER, the Department will now accept the client's self-attestation regarding assets, unless the specialist deems the self-attestation questionable for reasons outlined below, or verification is required per policy (BEM 400 and ERM 205). Any eligibility determinations for a month prior to December may still require verification of assets.

The Department is committed to program integrity. False statements are subject to investigation, and intentionally false statements are subject to prosecution. It is our expectation that simplified procedures will reduce error rates. We will be working with the Office of the Inspector General to review the impact of the policy changes, beginning with a random sample of cases.

When is Self-Attestation Questionable and Verification Required?

Specialists should use their best judgement to determine when an asset is considered questionable. Verification will be required in the following circumstances:

1. Reported liquid assets are \$10,000 or higher.
2. The applicant or a family or household member of the applicant was previously denied benefits based on having assets above the revised limit.
3. The case record contains an indication of fraud, such as an Intentional Program Violation (IPV) or Front-End Eligibility (FEE) investigation.
4. The specialist identifies other reasons to suspect the accuracy of the asset attestation. These reasons should be entered in the case record.

If a specialist determines that the asset self-attestation is questionable, they should follow the Bridges process for requesting verification. Specialists should use all available resources, including online resources and collateral contacts, prior to requesting verifications.

This policy change will be in effect for all new applications, effective ~~11/1/19~~ **12/1/19**. For active cases, this change will be addressed at the next redetermination, case change, semi-annual or mid-certification.

For eligibility determination months starting with ~~November~~ **December**, Bridges will accept the verification type of "Client statement" for certain assets as an acceptable verification and will no longer generate a VCL for Cash, FAP, and SER. Any eligibility determinations for a month prior to ~~November~~ **December** may still require verification of assets.

Example: Application for FAP and SER is received ~~10/28~~ **11/28**. Verification of assets is required for FAP for ~~October~~ **November** benefit determination. However, verification is not required for FAP for ~~November~~ **December** benefit determination unless questionable. Verification of assets is required for SER, as the application date is prior to ~~November 1st~~ **December 1st**.

Example: Application for Cash received ~~10/28~~ **11/28**. Verification of assets is not required for ~~November~~ **December** determination unless questionable.

ESA is committed to further efforts to streamline benefits processing for specialists. We are working to simplify the asset screens in Bridges further to make them much easier to go through. We also expect to revisit some of the asset definitions to better align them. And we will be monitoring the impact of the policy changes outlined above to determine if further changes are necessary. We will keep you informed.

There will be additional training materials coming from the Office of Workforce Development Training (OWTD) to support the implementation of this change.

Any questions should be directed to the appropriate policy mailbox:

Policy-FAP@michigan.gov

Policy-FIP-SDA-RAP@michigan.gov

Policy-SER@michigan.gov