

Iowa Department of Human Services

October 7, 1986



DEPARTMENT OF HUMAN SERVICES

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HUMAN SERVICES MANUAL LETTER NO. XXIV-A-1

ISSUED BY: Bureau of Eligibility, Division of Medical Services

SUBJECT: Case Record Retention for Denied Nursing Facility Applications

Summary

The Iowa Department of Human Services has applied for a 1115(a) Research and Demonstration waiver with the Health Care Financing Administration. If approved, the waiver allows the Iowa Medicaid program to extend the look-back and penalty period for transferring resources to obtain or maintain medical assistance from the current 30-month look-back and penalty period to a 60-month look-back and penalty period.

As part of the waiver project, historical data must be gathered regarding previous nursing facility services application denials. All nursing facility application denials from January 1, 1987, through present must be retained until approximately April 1, 1995. The ISU research team will contact and make arrangements with the Record Retention Center and the regional and local offices when they need access to the case records.

The cases to be retained for this time period have the following aid types: 13-0, 13-1, 13-6, 23-0, 23-1, 23-6, 24-5, 39-0, 53-0, 53-1, 63-0, 63-1, 63-2, 63-3, 63-6, 63-8, 63-7, 64-5, 73-2, and 73-3.

Effective Date

Upon receipt.

Additional Information

If you have any questions, please contact regional benefit payment administrator.

Thank you in advance for our cooperation in this matter.

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To effectively and efficiently administer the assistance programs of the Department, it is necessary to maintain appropriate records and controls. The case record is established to provide the record for individual clients or for eligible groups or households. It shall contain sufficient documentation and verification to establish eligibility for a particular program and the correct amount of assistance to which the recipient is entitled.

The case record is the responsibility of the income maintenance worker to whom the case is assigned. The worker number assigned to that worker shall be entered on all forms where such information is required.

MASTER INDEX FILE

Policy

Each county shall maintain two master index card files within the county office: (1) computer-generated case cards and (2) computer-generated person cards. Only the last computer-generated card shall be retained. The file shall not be available to the general public at any time. Any county that uses a computerized case-finding system need not comply with the master index system.

Comment

The files are maintained for these reasons.

- A. To provide better case finding service to clients, providers, county workers, and related agencies.
- B. To supplement the computer capabilities in times of terminal "down time" and in county offices without a terminal.
- C. To assist in maintaining a record of the caseload of the office and provide efficient cross references.

Procedure

The file system may be in an area and a container of county choice.

The master index file shall be in two sections identifiable as "Case Cards" or "Person Cards." The sections shall be arranged alphabetically by clients' last name, first name, initial.

The two files shall be within close proximity of each other. If physical facilities do not allow them in the same room, they shall be readily available by telephone for cross-reference.

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MASTER INDEX FILE (Cont.)

Procedure (Cont.)

Case and person cards shall be maintained as long as the case records or correspondence are maintained.

For all General Assistance (GA) cases in integrated counties, local offices are responsible for preparing case cards.

Comment

Person cards for GA clients are optional, although their usefulness for crossreferences should be considered. A colored card for GA cases would be an advantage so that the card is not confused with state-generated case and person cards.

Case Cards

Policy

The case cards shall indicate a case record within the agency by case name. The computer-generated case card (CDS 003 or SRS 003) also lists each eligible family member. Case identification will also be by aid type, address, caseworker, open or closed status.

Case cards shall be destroyed when the records to which they correspond are destroyed.

Person Cards

Policy

The person cards (CDS-004 or SRS-004) identify past or present clients by their name, rather than a case name. They also identify case name, aid type, address, caseworker, and open or closed status. These cards are generated for all Medicaid, services, and non-assistance Food Stamp clients.

Person cards shall be destroyed when the individual is deleted from the ABC or SRS system on an active case or at the same time case cards are destroyed.

Person cards shall be prepared for all correspondence that has an identifiable client, even though a case record is not prepared.

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MASTER INDEX FILE (Cont.)

Person Cards (Cont.)

Comment

Such correspondence shall be filed in a common file drawer, to be used when related information is received or a case is established.

CASE RECORD DESIGN

Policy

A common design shall be used for all benefit payment case records.

Comment

The purposes of the common design are:

- A. To facilitate statewide review.
- B. To eliminate redesign of client records each time they are transferred between counties.
- C. To enable any DHS employee, federal reviewers, and auditors to uniformly locate circumstances, verifications, documentations and justifications for case actions which are being reviewed.
- D. To allow for separation of records into sections so that permanent, nonvarying forms remain in the most current folder even when the record has to be divided.
- E. To facilitate destruction of obsolete forms and correspondence, without the danger of destroying permanently required forms.

Procedure

The folder tab shall identify case name, aid-type, and case number. All forms and documents shall be filed according to the date with the most recent on top. The content of the case folder shall be divided into three sections.

CASE RECORD DESIGN (Cont.)

Section I of Case Record

Policy

Section I of the case record shall contain the following documents, filed in order:

- 1. Face sheet on top
- 2. Narrative, latest entry on top
- 3. Permanently pertinent documentation and forms should be filed next. The following forms have been determined to be permanently needed:
 - a. Documentation

Divorce decrees Custody awards Court orders Appeal decisions (only if exception to policy) Trust fund clearances Funeral contracts and burial agreements Conservatorship and guardianship documents Identity and residency verification SSN copies Age verification Citizenship verification Disability verification

- b. Department Forms
 - (1) ADC

PA-2138-5	Unemployed Parent Referral to Job Service
	(removed when eligibility for ADC-UP ends)
PA-2226-5	ADC-UP Employment History Worksheet
AA-4148-0	Real Property Appendix
PA-2205-0	Property Transfer Appendix
PA-2106-0	Insurance Report (most recent)
CS-1101-5	Support Information (most recent)
CS-3101-5	Notice of Assigned Support (most recent)
CS-1105-5	Notice of Requirement to Cooperate and Right to
	Claim Good Cause
CS-1106-5	Second Notice of Right to Claim Good Cause
SSA-4681	Case Report on Claim of Good Cause

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CASE RECORD DESIGN (Cont.)

Section I of Case Record (Cont.)

Policy (Cont.)

WI 3403-0 WIN/CMS Registration Status Report WI 3404-5 Notice of Employment/Sanction PA-2126-5 Report on Incapacity (most recent) DD-1 Authorization Agreement for Automatic Deposits PA-2374-5 CWEP Registration PA-2237-5 Your Rights and Responsibilities CMS 2301 Your Rights and Responsibilities WI-3305 Your Rights and Responsibilities

- (2) Medical Assistance and State Supplementary Assistance
 - PA-3155-4 Report of Department of Social Services on Disability (most recent) 470-0409 Medical Assistance Termination Notice MA-4068-0 Designation of Primary Providers (permanent until notice of removal is received) MA-2124 Supplementary Application for Retroactive Medical Assistance MA-2151-0 ICF/MR Resident Care Agreement (most recent) MA-2152-0 ICF/MR Payment Agreement (most recent) MA-2138-0 Resident Care Agreement (most recent) Request for Special Update (retroactive medical) MA-4046 PA-2115-2 Physician's Report on Eye Examination (most recent) PA-2117-2 Optometrist's Report on Eye Examination (most recent)
 - PA-2106-0 Insurance Report
 - PA-5225-1 Important Notice About Your Property Tax
 - PA-2128-4 Medical Report on Disability (most recent)
 - PA-2129-4 Social History Report (most recent)

Section 503 Alert Notice or the last SDX to show concurrent Supplemental Security Income and Social Security Eligibility

(3) Food Stamps

FNS 394	Action Taken on Your Fraud Hearing (remove to sec-
	tion III when disqualification ends)
FP 2225-0	Record of Lost Benefits Restored (permanent until
	all benefits are restored)

CASE RECORD DESIGN (Cont.)

Section I of Case Record (Cont.)

Policy (Cont.)

4. Any other form not specifically included in other case record sections should be filed in Section I.

Comment

At the time of reapplication, certain "permanent" forms will have to be replaced with new forms. The obsolete forms can be placed in less current volumes when the case record is divided and held according to the Records Management Manual.

EXAMPLE:

CS-1105-0	Support Information Form
CS-3101-5	Notice of Assigned Support
WI 3403-0	WIN Registration Status Report
PA 2126-5	Report on Incapacity

County documents should be placed in a separate section. The Department cannot create forms to be signed or completed by clients except through the administrative rules process as contained in Management Manual XX-C.

Appeal decisions to be filed in this section do not include intentional program violation decisions for food stamps. This decision is filed in the recoupment section and is a permanent part of the record.

The narrative is used to supplement information that is not on the forms yet is essential or pertinent to the establishment of eligibility or for the amount of assistance or client participation.

Procedure

The narrative entry should begin with the date. The source of information and resulting action must be identified. Narrative entries must be brief and complete, with only substantiated conclusions entered. Information dealing with an application or complete review and changes subsequent to an application which are not covered by an existing form in the case record should be clarified. The caseworker's initials should be at the end of the entry.

CASE RECORD DESIGN (Cont.)

Section II of Case Record

Policy

All Turnaround Documents (TDs), Benefit Calculation Worksheets (BCWs), Notices of Decision, Notices of Cancellation, applications, monthly report forms, food stamp and ADC worksheets and supporting verification shall be filed on top of Section II with the most current on top. The ABC System Tickler, DP-4027, shall be the first item filed in Section II or last item filed in Section I, depending on local office option.

Section III of Case Record

Policy

The contents of Section III shall be any form or documentation relating to overpayments, recoupments or intentional program violations (IPV).

Comment

All calculations which pertain to the overpayment shall be filed in this section along with the recoupment forms. Forms shall be filed in date order with the latest on top.

The case record must not be destroyed, even if all programs are closed, until all claims are paid in full. Paid status is determined by examining the Overpayment Recoupment System Monthly Management Report (479 X 307-A1). If adjustments are made to the balance owed, the adjustment is recorded on form AA-1283-0, which is filed in Section III (e.g., lost benefits on corrective payments).

Official receipts remain permanent until audited. Then they are purged if older than three years. Local offices may wish to maintain receipts longer on cases with outstanding claims.

Procedure

Forms filed in section III include: AA-1201-0 Official Receipt (if it pertains to repayment on recoupment) The following forms are related to VI-G:

PA-2228-0 Overpayment/Recoupment Information
PA-2229-0 Overpayment/Recoupment Supplement
AA-1283-0 Overpayment/Recoupment Adjustment Letter

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CASE RECORD DESIGN (Cont.)

Section III of Case Record (Cont.)

Procedure (Cont.)

These forms are contained in Title VII:

FP 2208-0 Documentation of Claim Determination
470-0288 Notice of Disqualification
Overpayment calculations
Suspected IPV referrals
IPV decisions (shall be maintained as a permanent part of case record)

Form PA-3170-0, Notice of Overpayment, is contained in IV-Appendix.

Section IV of Case Record

Policy

The contents of Section IV shall be any printout relating to the Income Eligibility-Verification System (IEVS).

Comment

All printouts which are part of IEVS shall be filed in this section. Printouts shall be filed in date order with the latest on top.

Printouts filed in Section IV include:

S470X160-A Unemployment Compensation Report
S470X225-A Wage Report
S470X425-A SSA Earnings and Pension Report
S470X325-A Bendex Report
S470X325-B Bendex Error Report
S470X615-A Internal Revenue Service Report

Divided Case Records

Policy

Case records shall be divided into separate case folders any time a worker determines that the size of the record is unmanageable.

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CASE RECORD DESIGN (Cont.)

Divided Case Records (Cont.)

Comment

Divided records shall be identified on the front cover as #1, #2, etc., and shall also include the last date divided. The latest numbered volume shall be the current case records. At a minimum, it must contain the most recent forms or information. All sections may be divided.

Record and Section Options

Policy

EPSDT, medically needy, and county general assistance may be separate sections within the case folder or may be separate records.

Comment

Regardless of whether EPSDT or medically needy are separate sections or separate records, the filing should be done by date order. The section or record established for general assistance can be maintained in any format desired by the county.

Local Office Case Record Options

Policy

Local offices are allowed the flexibility of determining some aspects of the case record design.

Comment

- 1. Counties may determine the size of the case folders.
- 2. Counties may fasten sections to the case folder or leave fastened sections lose within the folder.
- Counties may use dividers between the forms and the narrative, in Section I.
- 4. Counties may use case contact sheets as the top page of narrative if that is the county's narrative procedure.
- 5. Counties may file an entire section by date with the latest date on top, or by category within a section with the latest date on top.

CASE RECORD DESIGN (Cont.)

Local Office Case Record Options (Cont.)

EXAMPLE

Date Filing

All forms, regardless of the category, are filed by the date completed. A WIN form completed on 7/19/85 and a CSRU form completed on 7/19/85 would be filed together on top of a payment history completed 7/10/85.

Category Filing

All CSRU forms are filed together with the one completed on 7/19/85 filed on top of the one completed 7/1/84.

All WIN forms are filed together with the one completed 7/19/85 filed on top of the one completed 6/1/85.

CASE RECORD TRANSFER

Policy

When an active case moves to a different county within the state, the case record shall immediately be transferred to the new county by first class mail or Purolator Courier.

Comment

Case records of closed or deceased recipients shall not be transferred, except when specifically requested by another county. A food stamp case closed only because the client has moved out of the county shall be transferred by first class mail or Purolator Courier when the county is aware that the client will apply for food stamps in the Iowa county to which they have moved. Cases transferred must have obsolete materials in Section I and II (as defined for retention by the Records Management Manual) destroyed before transfer. An office is not required to prepare or retain a skeleton case file on transferred case records. The cost of transferring the case record shall be paid by the county sending the case record.

A memo should be sent to the receiving county advising them that a particular case is being transferred. The memo must state the date a review is due. If a review is due in the month of the transfer, an entry should also be made in the priority information on the TD (field CI4) by stating "review due this

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CASE RECORD TRANSFER (Cont.)

Comment (Cont.)

month". Appropriate ABC procedures shall be used to update the ABC master file. For the TD entries to transfer a case to another county see XIV-B(4), Multiprogram Case Actions: Transferring Cases to Another County.

CASE RECORD DESTRUCTION

Policy

All case records shall be destroyed according to procedures established by the Department and approved by the State Records Commission. These procedures are found in the Records Management Manual. District and county offices have copies of this Manual. Any question or clarification of these procedures should be directed to the Division of Community Services. Requests for changes or additions to the records manual should be made through the Division of Community Services.

Case records shall be destroyed in a manner which insures client confidentiality. The time and method of destruction is a local office option, while keeping within the requirements of the Records Management Manual.

CASE READING

Policy

Income maintenance supervisors, county directors, benefit payment administrators and corrective action specialists shall read cases for accuracy and thoroughness. Each district shall designate the equivalent of one corrective action specialist to do case reading.

Comment

Case reading is a method used to monitor the case actions of line workers to assure that policies are uniformly interpreted and applied. Through case reading and analysis of the errors found in cases, districts can determine staff development needs within a county or within a district to work toward the prevention of future errors. Feedback from case reading can also be given to the supervisors as an indicator of an employee's performance.

Procedure

Each district has positions designated as corrective action specialists. These positions perform the following tasks in addition to case reading:

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CASE READING (Cont.)

Procedure (Cont.)

- A. <u>Floating</u>: The focus for floaters should be assisting with actual casework that would likely go undone or would not be timely because of an extended absence or vacancy. Unusual circumstances requiring additional staff may also warrant the use of floaters.
- B. <u>Training</u>: Corrective action specialists are expected to be up to date on all policy changes and to know current interpretations, clarifications, and procedures. Because of their knowledge, they can provide training individually or to groups of workers as the need is identified by the DA and BPA.
- C. <u>Special Assignments</u>: Corrective action specialists can be designated by the DA to assist with special problems where concern exists that benefits may not be handled properly or timely. Examples of such activities are case audits and helping local offices solve problems with the ABC system.

Corrective action specialists should not handle constituent complaints, unless this is done as a backup in the absence of the BPA or other staff who deal with complaints.

Corrective action specialists should not handle general administrative duties for the district, even though they may be related to benefit payment programs.

Corrective action specialists shall complete a summary report of case reading activities monthly. Districts shall complete the *Corrective Action Specialist Report*, 470-2037, by the tenth of the month following the report and send it to the Division of Community Services in central office.

Error-Targeted Case Reading by Corrective Action Specialists

Policy

Corrective action specialists shall read ADC and Food Stamp cases using the *Error-Targeted Case Reading Report*, form 470-2534. Results from corrective action specialist case readings shall be compiled and reported monthly to the district office and to central office.

Comment

The Error-Targeted Case Reading Report, form 470-2534, is targeted at specific error categories in the ADC and food stamp programs. The form is intended to maximize the time of the corrective action specialists by targeting their reading at specific error-prone areas. In addition, use

CASE READING (Cont.)

Error-Targeted Case Reading by Corrective Action Specialists (Cont.)

Comment (Cont.)

of the form provides a rapid flow of error-rate information back to the district offices and to the Bureau of Economic Assistance and the Bureau of Program Evaluation.

Since the Error-Targeted Case Reading Report is intended to produce data which is useful to the local offices, the district offices, and central office, corrective action specialists need to develop a tracking process to record the number of correct, incorrect, and questionable cases read. Each district is free to develop its own tracking process, so long as read cases are identified and the district office can ensure that the local office responds to these forms. The form itself is printed in three copies to facilitate the tracking process.

At a minimum, the district tracking process shall enable the district to provide the following information:

- 1. The number of cases read per month per work unit by the corrective action specialists.
- 2. The number of correct, incorrect, and questionable cases read in each work unit in each month, with correct and incorrect dollar figures.

For the purpose of this process, a work unit means a supervisor and the workers under that supervisor. This may be part of a county's work force, or the entire county work force. When a supervisor is in charge of two or more counties, a separate list shall be kept for each county.

A record of cases read, broken down by correct, incorrect, and questionable, shall be retained by the district offices to ensure that all error and questionable cases are corrected and responded to.

Procedure

Corrective action specialists shall read cases on a fiscal-month basis, from the twenty-first to the twentieth, rather than on a calendar-month basis. For example, a case read on February 21 is considered as read in the fiscal month of March. Cases read on or before the twentieth day of each month must be given to the work unit supervisor no later than end of day on the twentieth day of the month. Corrective action specialists are expected to read a minimum of two cases per worker district-wide before reading cases again of the first worker selected. Corrective action specialists are also expected to read 40 cases per month.

CASE READING (Cont.)

Error-Targeted Case Reading by Corrective Action Specialists (Cont.)

Procedure (Cont.)

The flow of the case reading report through the local and district offices is as follows:

- The corrective action specialist reads the case, records it for tracking purposes, and then gives two copies of the reading report to the work unit supervisor. The specialist may use one form per case or may wish to complete a form for each program involved.
- 2. Local office supervisors are responsible for reviewing the form, giving it to the worker for correction and then tracking it to see that it's returned. Workers have ten working days to review the form, make corrections, and return it to the supervisor.

At the end of each month, the supervisors fill out a separate case reading form for each program (ADC, PA Food Stamps, NPA Food Stamps), listing the total number of errors discovered in each error category for that work unit. Questionable cases that were resolved with no error shall not be noted on the monthly error summary. Questionable cases on which errors were discovered shall be reported on the monthly summary as errors. Significant information on error trends and system or policy problems shall be included.

The supervisor shall also complete a *Supervisor Monthly Case Reading Report*, form 470-2535, as later described. The supervisor's forms shall be sent to the district benefit payment administrator (BPA) by the fifth working day of the next calendar month.

- 3. The BPAs also complete a summary case reading form and monthly report at the end of each month for each program, totalling the errors for that district and giving other comments as appropriate. The BPAs send this to the Bureau of Program Evaluation for PA and NPA Food Stamps and to the Bureau of Economic Assistance for ADC by the tenth working day of the month. BPAs may also use the data for district corrective action.
- 4. Central office staff review the error data and comments and take action as appropriate. Central office staff are also responsible for producing the quarterly printout, modifying the case reading form and quarterly report if error categories change, and issuing a monthly report to the districts showing state-wide reading results of cases read in the prior month by the fifteenth working day of each month. District or state-wide error-targeted training will also be produced, as appropriate.

CASE READING (Cont.)

Error-Targeted Case Reading by Corrective Action Specialists (Cont.)

Procedure (Cont.)

Central office staff shall total the forms provided by the districts to obtain state-wide data and error-trend information. This information is totalled monthly for each program and then is given to the Economic Assistance Quality Improvement Plan management committee, with copies to the district offices. This information is used to develop specific corrective actions.

This process ensures that all work units are aware of the types of errors being found and also provides for a faster flow of information than the figures now provided by Quality Control. Monthly reports shall be prepared for each work unit or county, whichever is smaller.

Case Scanning Requirements

Policy

All applications must be scanned by the first-level reader to monitor the timeliness of decisions on applications and to review critical eligibility requirements which are error-prone.

Comment

Errors on applications have historically had an impact on Iowa's error rate. Careful review of applications identifies errors initially so that corrections can be made before benefits are issued.

CASE READING (Cont.)

Case Scanning Requirements (Cont.)

Procedure

The Income Maintenance Case Reading and Scan Report, form 470-2039, has asterisks preceding the items used for scanning. Districts are allowed flexibility in deciding whether supervisors are required to use form 470-2039 for scanning. Districts should consider having the form completed by new supervisors, supervisors of new workers, supervisors without recent income maintenance experience, and supervisors or counties with identified personnel problems.

Case Reading Requirements

Policy

Districts shall assure that some applications and ongoing cases are read each month for all income maintenance workers.

Comment

Income maintenance supervisors or county directors that directly supervise income maintenance workers should complete the case reading requirements. If either of these positions are vacant, a district may use the corrective action specialists to meet the case reading requirements.

Procedure

The first-level supervisor shall read a minimum of five cases (either applications or ongoing cases) each month for each permanent income main-tenance worker and complete form 470-2039. If a worker handles all programs, case reading should also include all programs each month.

For new workers in probationary status, all cases shall be reviewed monthly by the first-level supervisor for at least three months. Form 470-2039 must be completed on 25% of the cases monitored. After three months, the first-line supervisor may reduce the case reading requirement depending on the worker's performance.

Use of Case Reading in Performance Evaluations

Policy

Performance ratings shall be based on the level of compliance determined by the case reading forms completed by the supervisor during the evaluation period.

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CASE READING (Cont.)

Use of Case Reading in Performance Evaluations (Cont.)

Comment

First-line supervisors have limited flexibility in considering what constitutes an error. For one month following the effective date of a policy or procedure, an error for that change only is not counted. All other errors should be considered, regardless of whether the employee is probationary or has permanent status.

Procedure

Form 470-2039 was developed to be consistent with the standardized performance evaluation Section A. The *Income Maintenance Case Reading Summary Report*, form 470-2026, is an optional form that can be used to assist first-level supervisors in preparing the performance evaluation.

Comment

Case reading forms completed by the first-level supervisor shall be used for the evaluation. Case reading forms completed by the corrective action specialists should not be included in the evaluation. Supervisors may use the information from the case reading forms completed by corrective action specialists to conduct their own review of an employee's work. Supervisors shall use the results of their own review for the evaluation.

APPLICATION REGISTER

Policy

Each county shall maintain an *Application Register*, form RS-1109-0, for all financial assistance applications.

Comment

The purpose of the Application Register is:

- A. To provide assurance to the client that the client's request will not be overlooked and that prompt action will be taken.
- B. To provide for workers a check list of applications needing action.
- C. To provide supervisors with an accurate picture of intake activity when assigning workloads and structuring work flow.

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APPLICATION REGISTER (Cont.)

Comment (Cont.)

D. To supply information necessary in compiling agency reports and administrative studies by tracking the disposition of every application that comes into the office.

Procedure

The application register may be maintained in a central location in the county office. It may be maintained by individual intake workers with copies submitted to the supervisor at the end of each month.

If the register is not maintained centrally, each supervisor shall be responsible for keeping a register of all intake for that unit for the last 12 months.

INCOME MAINTENANCE CASEWEIGHT

Policy

All income maintenance ongoing cases and applications are assigned a caseweight by the Income Maintenance Caseweight System.

Comment

The purpose of the Income Maintenance Caseweight System is to allow for equal distribution of workload among income maintenance workers and to establish a statewide average workload a worker can handle. See XXIV-A-Appendix for the assigned caseweights for each type of case.