WISCONSIN DEPARTMENT OF HEALTH SERVICES Division of Medicaid Services 1 W. Wilson St. Madison WI 53703

| То: | FSET Handbook Users |
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| From: | Jori Mundy, Bureau Director Bureau of Eligibility and Enrollment Policy |
| Dec | |
| Re: | FSET Handbook Release 23-01 |
| Release Date: | 08/14/2023 |

| EFFECTI | VE DATE | The following policy additions or changes are effective 08/14/2023 unless otherwise noted. Underlined text denotes new text. Text with a strike through it denotes deleted text. |
|---------|-----------------------|--|
| POLICY | UPDATES | |
| 1.4.4 | Educational | Updated information on funding educational activity. |
| | Components | |
| 1.4.4.2 | Career/Technical | Clarified policy does not include traditional four-year or higher college |
| | Education Program | programs. |
| 1.4.8 | Case Management | Updated time tracking instructions. |
| 6.5.1 | Monthly Participation | Updated instructions to track participation. |
| 10.3 | Appendix C: FSET | Updated instructions to match other updates in this release. |
| | Fundable Component | |
| | Activities | |
| 10.4 | Appendix D: | Added "Incentives" to table. |
| | Supportive Services | |
| | Allowable Expenses | |

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1.4 FSET Component Activities

1.4.4 Education Components

All activities within the Education Components are qualifying activities. All educational activities must have a direct link to employment. The Education Components include the following:-

- Basic/Foundational Skills Instruction
- Career/Technical Education Program
- English Language Acquisition
- Integrated Training or Bridge Program
- Work Readiness Training

The following factors are critical in determining whether FSET funding may be used to fund an educational activity:

- The educational activity must be on the participant's employment plan.
- FSET funding cannot be used to replace non-Federal funds for existing educational services and activities. <u>This includes costs associated with programs</u> or courses offered through public high schools. While there are instances when it may be appropriate to provide FSET services to students after school or on the weekends (that is, outside of a high school setting), the costs must be reasonable and necessary.
- Charges for FSET students cannot exceed the cost applied to non-FSET students for the same service or activity.
- A FoodShare member who is an eligible student already attending the institution prior to FSET participation may volunteer to participate in another FSET activity. However, it is not appropriate to use FSET funds to subsidize those education expenses.

| Example | Frida is an FSET participant. Frida is interested in fork lift training. The |
|---------|--|
| 1 | FSET worker determines Frida has the necessary skills to participate and |
| | helps Frida enroll in an upcoming fork lift training. The FSET worker adds |
| | the training to Frida's Employment Plan (EP). There are no other funds |
| | available to pay for this training, Frida was not enrolled prior to |
| | participating in FSET and the charges for Frida are the same as for non- |
| | FSET students. FSET funds can be used to pay for the cost of this |
| | training. |

See <u>SECTION 10.3 APPENDIX C: FSET FUNDABLE COMPONENT ACTIVITIES</u>—for a full description of the activities listed in the subsections below.

1.4.4.2 Career/Technical Education Program

The Career/Technical Education Program component includes the Credential or Certificate Receiving Program activity. These activities are generally short-term and competency-based with hands-on experience and a quantifiable measurement of

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success. The measurements of success will vary depending on the career/technical education program. Criteria for participation in this component will vary on the assigned Career/Technical Education Program.

Classes taken for personal development outside of an established program curriculum do not qualify under the Career/Technical Education Program.

<u>Courses taken to earn a traditional four-year or higher college degree do not qualify</u> <u>under the Career/Technical Education Program.</u>

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his courses for the Restaurant Management Technical Diploma Program, he has signed up for a class for ballroom dancing. Enrique is taking ballroom dancing for personal development, and it is outside of an established program curriculum. The FSET worker does not add ballroom dancing to Enrique's EP.

1.4.8 Case Management

Case Management must be on every Employment Plan for all FSET participants. The Case Management activity is a qualifying activity that <u>should must</u> be used for all initial and ongoing case management appointments. FSET workers must also assign at least one activity in addition to case management for all FSET participants. For individuals who need to meet the <u>FoodShare work requirement for</u> able-bodied adults without dependents (ABAWD) work requirement, this additional activity must be a qualifying activity.

FSET workers must track the actual time spent providing case management services while engaging directly with the participant. FSET worker tasks that do not involve direct contact with a participant are documented in PIN comments but are not tracked in the FSET tool. Direct contact may be face-to-face, via telephone, or virtual, which includes, but is not limited to, texting and emailing communication.

| Example | Naiya, an FSET participant, calls the FSET worker after receiving three | | |
|----------|---|--|--|
| <u>6</u> | voicemails, multiple texts, and a letter encouraging agency contact. | | |
| | During the phone call with the worker, job retention was explained, | | |
| | offered, and accepted. Naiya's employment plan was also updated. The | | |
| | worker enters the actual time spent speaking directly with Naiya under | | |
| | case management. Attempts to reach Naiya by phone, text, and letter are | | |
| | entered in PIN comments but not tracked as time spent providing case | | |
| | management. | | |

6.5 Tracking FSET Participation

6.5.1 Monthly Participation

FSET agencies must collect and record attendance information participation hours in CWW for assigned activities for all <u>participants</u>, including ABAWD and non-ABAWD participants.

All participation documentation must be obtained from the FSET participant, work site or other education and training providers on a monthly basis-(__at minimum).__The documentation must be maintained in the participant's electronic case file (ECF). FSET agencies must provide participants with a variety of methods for submitting participation hours including, but not limited to, in-person, over the phone, email, 24-hour drop boxes, and fax.

A Track Participation page must be created for each month the individual is enrolled in FSET, including any months with zero participation hours.

FSET agencies are responsible for collecting group activity participation when multiple participants are engaged in the same activity at one location. It is the primary responsibility of the participant to return the paperwork to the agency verifying participation in activities that involve an activity log. The agency should make arrangements to get the paperwork directly from the service provider when possible. FSET agencies can encourage participants to turn in participation hours on a weekly basis, however, FSET agencies must notify participants that they should at a minimum submit documentation of participation hours by the end of the current month of participation.—

Individuals assigned to job retention should be assigned a minimum of one hour per month of job retention. However, tracking hours of participation in job retention depends on the actual number of hours the person receives job retention services. Track the actual number of hours of job retention that is completed by the participant as you would track any other assigned activity.-

Example Veng participates in post-secondary education, gains employment, and agrees to participate in job retention. Veng's FSET case manager updates his EP and assigns one hour of job retention for the current month. Veng participants in three hours of job retention services in March, so the FSET case manager tracks three hours of job retention.-

See <u>SECTION 1.4.7 JOB RETENTION</u>—for more information on this activity. Record the number of work hours under the employment activity code. Any additional activities should be recorded under that specific activity code.

10.3 Appendix C: FSET Fundable Component Activities

| Code | Description | Details |
|------|---|---|
| AP | Pre-Apprenticeship /Apprenticeship | FSET workers may assign Pre- Apprenticeship/Apprenticeship for individuals interested in career paths that require apprenticeship training. Pre-Apprenticeship is an opportunity to help FSET participants gain the necessary skills for an apprenticeship. These programs can play a valuable role in preparing FSET participants for a career, while contributing to the development of a diverse and skilled workforce. Apprenticeships offer numerous benefits to both employers and participants. Apprenticeship is post-secondary education like a college or university, but apprentices learn only a portion of their skills in a traditional classroom. They receive most of their training on-the-job, while working for an employer who pays a good wage. The employment is the primary requirement for an apprenticeship – a job must exist for the apprentice to be trained The criteria for participating in a Pre- Apprenticeship/Apprenticeship will vary depending on the field of interest. If an FSET participant is interested in becoming an arborist or working in construction but doesn't have the developed skills, a pre-apprenticeship or apprenticeship (depending on skill level and requirements of the trade) can connect the participant with local employers and begin their training toward career goals. Many apprenticeship and pre-apprenticeship programs are offered through the Wisconsin Technical College System. FSET workers should reference criteria for participation that can be found online or contacting the college directly. These criteria will vary based on program and are evaluated as a part of case management. |
| A1 | Credential or Certificate Receiving Program | A Credential or Certificate Receiving Program is short- term, competency based, with a hands-on experience emphasis and a quantifiable measurement of success. |

| | | The measurements of success will vary depending on the program. Criteria for participation in this activity will vary on the assigned educational program or other vocational training activity. FSET agencies will assist the participant through their activity assignment with at least monthly check-ins and provide any reasonable and necessary participant reimbursements for participation. Count the number of hours the person is in the |
|----|--|--|
| | | classroom and up to one hour of unsupervised study time for each hour of class time. Supervised study time may also be assigned under this activity. A statement from the educational program indicating that an additional amount of study time may be required to successfully complete the course can be included in the assigned number of hours. |
| BE | Adult Basic Education | Assign this activity to participants who are engaged in an adult basic education course or literacy skills courses in the areas of reading, mathematics, communication skills, social studies, physical sciences, and health. Count the number of hours the person is in the classroom and up to one hour of unsupervised study time for each hour of class time. Supervised study time may also be assigned under this activity. A statement from the educational program indicating that an additional amount of study time may be required to successfully complete the course can be included in the assigned number of hours. |
| BR | Integrated Training or Bridge Program | Integrated Training or Bridge Programs vary depending on the sector and population served. Bridge Programs are offered to upper-level students in high school soon to be entering their first year of college. Bridge Programs are also transitional programs for students who typically hold a two-year college degree and seek to obtain a four-year or graduate degree. The criteria for participation in this component will vary greatly by the Integrated Training or Bridge Program that is assigned. For example, if a nursing bridge program is offered, FSET workers must research the skills, knowledge, and experience necessary to participate in the nursing bridge program. If a participant does not meet the standards for the |

| | | program, the FSET case manager will work with the participant to assign other activities to gain the required skills for the nursing program. |
|----|--------------------|--|
| CE | Career Planning | Assign this activity if participant is receiving services to evaluate their career interests, guide the career planning process, or advance their career, as long as the participant has a realistic and viable goal. Examples include career exploration, job shadowing; evaluations for aptitude, skills, reviewing labor market information and training opportunities; and career guidance and counseling. |
| СМ | Case Management | Case Management must be on every Employment Plan for all FSET participants. The Case Management activity is a qualifying activity and should be used for all initial and ongoing case management appointments. FSET workers must also assign at least one activity in addition to case management for all FSET participants. For individuals who need to meet the FoodShare work requirement for able-bodied adults without dependents (ABAWDs), this additional activity must be a qualifying activity. |
| | | <u>Count hours as the actual time spent providing case</u> <u>management while engaging directly with the</u> <u>participant. FSET worker tasks that do not involve</u> <u>direct contact with a participant are documented in PIN</u> <u>comments but are not tracked in the FSET tool.</u> |
| DR | Driver's Education | Assign this activity when a participant is enrolled in a course of study that includes both classroom and behind-the-wheel instruction designed to prepare the student to pass the Wisconsin Driver's License Examination. |
| EL | Language/Literacy | FSET workers assign this activity to participants who need assistance learning English to expand their employment opportunities. This activity may be assigned to participants enrolled in English as a Second Language (ESL) course or trainings and activities meant to prepare participants for ESL courses. This code can be used when someone is enrolled in literacy classes that assist with their ability to read or write. Count the number of hours the person is in the classroom and up to one hour of unsupervised study time for each hour of class time. Supervised study time may also be assigned under this activity. A |

| | | statement from the educational program indicating that an additional amount of study time may be required to successfully complete the course can be included in the assigned number of hours. |
|----|--------------------------------|---|
| EO | Enrollment with Orientation | Use this code for individuals who participate in a set of activities designed to orient and enroll the individual into the FSET program. Assign this activity if a participant is participating in a non-qualifying activity for ABAWDs, unless it makes up less than half of an ABAWD's total monthly FSET participation hours. |
| ES | Supervised Job Search | Assign this activity to participants engaged in supervised job search that is tailored to individual needs, such as 1) time used to research prospective employers; 2) making contact with prospective employers to learn of job openings, whether by phone, in person, or via the internet; 3) completing applications for job vacancies; 4) preparing for job interviews; 5) interviewing for jobs; and 6) workshops on effective job seeking and interviewing skills. This is a non-qualifying activity for ABAWDs, unless it makes up less than half of an ABAWD's total monthly FSET participation hours. |
| HE | High School Equivalency | Assign this activity for participants who are receiving instruction and study time designed to prepare for the tests of General Educational Development (GED) or High School Equivalency Diploma. |
| IN | Internship | Assign this activity to participants seeking short-term work experience to get entry-level exposure to a particular industry or field. It is as much of a learning experience as it is work. Ideally, interns spend their time working on relevant projects, learning about the field, making industry connections, and developing both hard and soft skills. Internships sometimes lead to full-time job offers. The criteria for participation will vary depending on the internship industry or field. For example, if a marketing internship is offered, workers will research the skills, knowledge, and experience necessary to participate in the marketing internship. If a participant does not meet the standards for the |

| | | program, the FSET worker will assign the participant to other activities to gain the required skills for the marketing internship program. |
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| JR | Job Retention | Job Retention can be provided for up to 90 days to an individual who has secured employment after enrolling in FSET. The individual may also be participating in other FSET components or assigned activities, however, participation in additional activities is not required. Job Retention services may include: 1) job retention reimbursement; 2) reviewing workplace demands and employer expectations; 3) strategies to help the individual stay employed; 4) job-specific problem solving; and 5) crisis resolution. |
| JS | Job Skills Training Program | Assign this activity when a participant is enrolled in a training arranged to meet the specific needs of an employer or a general training that prepares an individual for a specific occupation within a particular employment sector where they will not earn an industry recognized credential. The training will provide skills to help the participant obtain employment or to advance or adapt to the changing demands of the workplace. Count the number of hours the person is in the training and up to one hour of unsupervised study time for each hour of training time. Supervised study time may also be assigned under this activity. A statement from the training program indicating that an additional amount of study time may be required to successfully complete the training can be included in the assigned number of hours. |
| JT | Job Search Training | Job Search Training is for participants who need general guidance with the job search process. FSET workers must assist Job Search Training participants in developing, practicing, and applying job seeking skills with the goal of becoming proficient in searching for employment. This includes: |
| | | Assistance with applications and resume development Interviewing skills, including mock interviewing- |
| | | Individuals need limited skills to participate in this component. FSET workers will evaluate on an ongoing basis whether forward momentum is being made through ongoing assessments. FSET workers will assist participants with computer literacy skills required |

| | | to move into the Supervised Job Search component leading to employment. Job Search Training is a non-qualifying activity; |
|----|------------------------------|--|
| | | therefore, FSET workers must not assign ABAWDs to non-qualifying activities including Job Search Training for more than half of their total required hours |
| MO | Job Readiness/ Motivation | Assign this activity to participants engaged in classes and group or individual activities specifically designed to prepare them for work. Activities are geared toward learning general workplace expectations, work behavior and skills necessary to compete successfully in the labor market. <u>A highHigh</u> -quality job readiness program usesactivities use various techniques and approaches to build self-esteem and increase self-confidence. Activities may include: <u>1) instruction, but are not limited</u> <u>to:</u> |
| | | Instruction in workplace expectations (including instruction on appropriate attire); 2) workshops). Workshops or coaching on self-esteem, goal setting, etc.; and 3). Lessons or courses on basic computer skills and use of internet. Job readiness activities may be completed independently or in a group setting. |
| | | If an individual is <u>enrolled in assigned to a</u> comprehensive job readiness program <u>curriculum, ifthat</u> <u>is designed to prepare them for work</u> , the <u>intent of the</u> <u>component is met, it canprogram may</u> include <u>additionalother</u> activities, such as financial literacy, household management techniques, and assistance with other life skills, that help an individual's circumstances, so they are a better able to obtain or maintain employment. |
| | | When MO is individualized, case managers must document the content of their one-on-one MO acitvities/discussions in PIN comments to support why this activity was selected rather than case management. |
| OJ | On-the-Job Training | FSET workers may assign On-the-Job Training when an FSET participant is performing tasks or processes related to their occupation. The FSET participant |

| | | typically performs tasks that are essential to their job function with the supervision of a manager, coach, or mentor. This type of training is typically used to broaden an employee's skill set and to increase productivity. |
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| SE | Self-Employment Training | Assign this activity when a person is involved in a Self- Employment Training or individualized technical assistance program. In general, individuals assigned to this component have sound business ideas but lack the skills to successfully create and implement a plan for successful self-employment. Participants receive help to develop their business, create sound financial and marketing plans, access grant and local self- employment funds and provide other business support services. |
| SF | Full-Time Employment: Subsidized | Assign this activity when a participant is employed or self-employed in a subsidized position full-time (30 or more hours per week). |
| SP | Part-Time Employment: Subsidized | Assign this activity when a participant is employed or self-employed in a subsidized position part-time (fewer than 30 hours per week). |
| TE | Transitional Employment (Co- Enrollment) | Transitional Jobs programs are government-sponsored employment programs where the state subsidizes short-term work opportunities – which can include placement and training as well as pay – to previously unemployed individuals in the public, private, or non- profit sectors. |
| | | Criteria for participation depends on the employment sector. |
| TJ | Trial Employment Match Program (TEMP) | Trial Employment Match Program (TEMP) is a W-2 employment position that provides subsidized work for applicants or ongoing W-2 participants. An individual working in a TEMP job earns at least minimum wage, and the W-2 agency subsidizes all or a portion of the hourly wages paid to the individual by the employer. |
| | | A TEMP job can last for a maximum of six months with an opportunity for a three-month extension. A custodial parent may take part in more than one TEMP job, but may not exceed a total of 24 months of participation in TEMP |

| | | An NCP meeting eligibility for W-2 case management services may take part in only one TEMP job, provided that the NCP has not exceeded the 24-month TEMP time limit. |
|----|--|--|
| UF | Full-Time Employment: Unsubsidized | Assign this activity when a participant is employed or self-employed full-time (30 or more hours per week). |
| UP | Part-Time Employment: Unsubsidized | Assign this activity when a participant is employed or self-employed part-time (fewer than 30 hours per week). |
| WE | Work Experience/W- 2 | Assign this activity for participants who are job shadowing or learning work skills in an unpaid work experience as part of the W-2 program. |
| WF | Workfare | Assign this activity to ABAWD-TLB participants. Workfare is a qualifying activity for ABAWDs who need to develop the basic skills and/or work history necessary to enter the job market successfully. FSET agencies should not assign employed participants to Workfare. Workfare positions may be established with public or private non-profit employers, such as housing authorities, parks and recreations, and sanitation departments. The goal of Workfare is for participants to learn new job skills and establish work references. A household's monthly Workfare participation requirement is determined by dividing the FoodShare benefit amount by the minimum wage. FSET agencies should document in PIN comments when the participant lives in a household that includes multiple ABAWDs sharing responsibility for meeting Workfare participation requirements. |
| WJ | Workfare Job Search | Workfare Job Search may be assigned to ABAWDs during the first 30 days after enrollment at initial certification prior to making a Workfare site placement. Workfare Job Search includes activities outlined in the Supervised Job Search activity component, with the exception that Workfare Job Search does not need to be completed at approved locations or be supervised. The household's Workfare hourly requirement is determined by dividing the FoodShare benefit amount by the minimum wage. Workfare participants are considered to be participating in and complying with Workfare requirements during this 30-day job search period and are meeting the FoodShare work |

| | | requirement. An FSET participant who has more than one initial certification may be assigned to Workfare Job Search at each initial certification but cannot be assigned Workfare Job Search at recertification. |
|----|---------------|---|
| WX | Work Activity | Work Activity involves working off the household benefit, therefore it is not possible for an individual to volunteer for additional hours of Work Activity beyond the number of hours equal to the household's allotment for that month divided by the higher of the applicable federal or State minimum wage. Work Activity ends when the household benefit has been worked off, but this would not be sufficient for an ABAWD to meet the FoodShare work requirement. If an ABAWD does work activity for their benefit divided by the minimum wage and it is, for example, only 6 hours a week, then the ABAWD must find 14 additional hours per week of work or a different qualifying activity. |

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10.4 Appendix D: Supportive Services Allowable Expenses

| Item | Almost Always | Sometimes | Never | Other Details |
|--|------------------|-----------|-------|---|
| Auto insurance | | | Х | |
| Auto ownership tag, title, licensing | | x | | Only if required for FSET participation and no other transportation option is available. |
| Auto purchase | | | х | |
| Auto repairs | | X | | ONLY UNDER SPECIFIC CONDITIONS.* |
| Background checks | | Х | | Only if required for employment and training. |
| Books | х | | | |
| Clothing for job interview | Х | | | |
| Clothing required for a job | | X | | Uniforms almost always. Otherwise, clothing costs are limited and must be reasonable and necessary for employment as a part of job retention. |
| Commercial driver's license | | Х | | Only if required for employment. |
| Computers, laptops, etc. | | | Х | |
| Course registration fees | X | | | |
| Dental work | | X | | To the extent that it is required for employment and as funds allow for reimbursement. Dental work costs are limited to minor work, such as a cleaning. Major work, such as oral surgery, bridge work, braces, and dentures, are not allowable expenses. |

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| Dependent care costs | X | | | |
| Driver license applications and renewal fees | | X | | Must be reasonable and necessary for participation in an employment and training component or employment as a part of job retention. |
| Drug/alcohol counseling | | | Х | Refer participant to another agency. |
| Drug tests | | х | | Only if required for employment. |
| Equipment | | X | | Must be reasonable and necessary for participation in an employment and training component or employment as a part of job retention. |
| Fines | | | x | No exceptions for any type. |
| Fingerprinting | | х | | Only if required for employment. |
| Gas | X | | | Includes reimbursement for gas when it is reasonable and necessary for the participant to rely on someone else to provide transport to and from assigned FSET activities. |
| Incentives | | | X | Supportive services must be both reasonable and necessary for FSET participation. FSET workers cannot provide supportive services as incentives or rewards for enrollment or participation in FSET under any circumstances. |
| Legal services | - | X | - | Must be very minor (i.e.,such as, notary <u>services</u>) and directly related to employment. |
| Licensing and bonding fees for work or work experience | X | | | |

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| Living expenses and stipends | | | Х | |
| Medical expense | | x | | Only if minor and required for employment, such as a tuberculosis test. |
| Mental health counseling or treatment | | | X | Refer participant to appropriate agency. |
| Relocation expenses | | x | | Must be reasonable and necessary for employment as part of a job retention component. |
| Safety items (on the job) | X | | | |
| Student activity fees | | X | | Only if required to participate in class. |
| Student loans | | | X | Participants should apply for financial aid. |
| Taxi driver's license | | Х | | Only if required for employment. |
| Test fees | | x | | Must be directly applicable to employment and all other funding sources exhausted. |
| Temporary housing | | X | | Housing assistance may be provided on a case-by-case basis for emergency situations, and only when all other funding sources have been exhausted. The rationale for housing assistance must also be documented in PIN comments in the FSET Tool. Housing assistance may be provided for a period of one month maximum per an individual's FoodShare certification period.** |
| Tools | | X | | Must be reasonable and necessary for participation in an employment and training component or employment as part of job retention. |

| Training materials | х | | |
|---|---|---|--|
| Transportation expenses (gas, bus fare) | Х | | |
| Tuition and fees | | x | |
| Uniforms | Х | | |
| Union dues | | x | Only if required for employment. |
| Vision needs (glasses or eye exam) | | X | Must be reasonable and necessary for participation in an employment and training component or employment as a part of job retention. |

*Auto repairs may be an allowable expense if all of the following conditions are met:

- The repairs are reasonable and necessary for participation in an approved FSET activity
- The FSET volunteer resides in a rural county or area of the state where there is no or very limited public transportation
- Carpooling is not a realistic option
- Cost estimates are verified from at least two auto repair shops
- The title of the auto is registered in the name of the FSET volunteer
- The FSET volunteer holds a valid driver's license
- The cost of the repairs will not exceed the value of the auto
- Repairs are not for cosmetic reasons
- Reimbursement is limited to a one-time expense
- The agency can guarantee that the repairs cannot be paid by another source

| Example 1: | Lenny applies and becomes eligible for FoodShare in January 2019 and maintains eligibility until his next recertification in December 31, 2019. Lenny received temporary housing assistance in May 2019. Lenny would again become eligible for another month of temporary housing assistance on January 1, 2020, the first month of the new certification period. |
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| Example 2: | Ivy applies and becomes eligible for FoodShare in January 2019 and receives temporary housing assistance in February 2019. Ivy loses FoodShare eligibility in May 2019 and reapplies and regains eligibility in August 2019. Ivy is again eligible for |

| | temporary housing assistance after her new application in August 2019. |
|------------|--|
| Example 3: | Chrissy and her husband, Phil, apply and become eligible for FoodShare in January 2019. Chrissy receives temporary housing assistance in February 2019. In June 2019 Chrissy loses FoodShare eligibility due to three TLBs while her husband, Phil, remains eligible through December 2019. Chrissy regains eligibility for FoodShare by meeting the FoodShare work requirement in June 2019. Chrissy would not be eligible for temporary housing assistance until January 2020, the first month of the new certification period |