

Rule Writing & Workflow

Finding the Rule to Change:

Changes in legislature necessitate changes to various rules. When those changes occur rule-writers must update the rules to reflect the new legislature. In order to do so, rule writers first have to find the rules they need to change. They do this by searching both their rule book and the rules online – it is easier finding the information on the printed document so they often prefer starting with the book.

After looking at the rule-book they locate the rules on their shared directory (PPP Library > Rules > Current and navigate to the appropriate section). They will then do a word or phrase search on the folder in order to find the sections affected (and often print each search screen so they can retrace that search).

Writing the Bulletin:

Once they find the affected sections they copy the rule to their hard drive. At this point they are ready to write the Bulletin. They will open a blank bulletin template (it appears that users have their own customized Bulletin Cover Sheet).

After the Bulletin has been completed, the writer will send it by email to the administrative staff as well as distribute to their colleagues for comments. It is a challenge for writers dealing with multiple edits on the same section – the document can get very complicated since they could have as many as 15 editors.

Receiving Comments:

These comments are received back in a variety of formats:

- Handwritten (half of them)
- Using the Review function in word
- Marked electronically on the document but without using the track changes function
- A typed note- not on the document itself

Writers will then have to consolidate all the comments and annotate the document so they know who added each comment.

Attaching APA Pages:

After all changes have been consolidated writers attach the APA pages, most of which are cut-and-paste from the Bulletin cover sheet except for the “Economic Impact”. The APA pages also contains a background summary which has to be edited down to 150 words. The Draft Bulletin and the APA pages are then sent the Draft to MAB.

Public Hearing & Comments:

All rules must be printed in the newspaper and public hearings are held. The public sends comments (via email or regular mail) and these comments, along with a response to them, are incorporated in the document. The rule is amended, if necessary, and then send again to the internal staff.

Signature Route & Committees:

The document is then send for signature and send to the SOS and other committees. A rule process section is added (the rest is identical to final proposed)- half of the time there are changes that need to be made and then it becomes Final Adopted, signed, published, and saved. Keep in mind that many of these signatures must be added manually, which means that these documents must be physically presented for signature.

Filing Schedules:

At the beginning of each year the filing schedules are put together. Currently this schedule is maintained by the administrative secretary. Each time a rule needs to be updated, a timeline is created for that rule filing, based on the dates of the filing schedule. The rule-schedule shows at which date each step needs to be completed in order to adhere to the filing schedule.

User Types

Super Users (writers, policy analysts, operation managers)

Part of their job is to change / explain the rules internally and to the districts. They are very well versed on the rules, keep up with the updates, have developed their own system of finding them. Looking at the rules is not something they can choose to do or not – they have to on a daily basis. Super users use the computer with great ease and have no difficulty navigating the rule categories. They can quickly figure out where a rule might be and find it relatively easily. Still, they find the rule index cumbersome and non-intuitive. They make many notes and highlights on their own rule book as well as keep related information filed next to each rule (memos, emails, training material, etc). They have been with the department for at least 5-6 years, most of them for longer. Their tasks are many-fold but can be summarized as:

1. Find rules to apply changes
2. Find rules for which they need to provide clarifications
3. Cross reference rules
4. Find old rules (and bulletins)
5. Make edits / changes on rules
6. Communicate with their internal staff edits on draft rules
7. Incorporate comments and edits to draft/proposed rules
8. Create Bulletin & APA cover sheets
9. Follow and steps and keep track of change rule process & filing schedule

Active Users (district directors, district assistant directors, supervisors)

All district directors and supervisors access rules daily. They are responsible for clarifying rules to their staff, as well as communicating to them any updates. This user-group's rule books vary greatly in how updated they are. Some tend to be very well updated while others are not so diligently updated. This group not only often references their training material and quick-guides, but often creates those guide-sheets (also called quick-guides or cheat-sheets). They will create these guides when they see that their staff had recurrent questions or a pattern of errors.

They are generally well versed in the rules, they know where to find what and how. Although they could send comments to changing rules they almost never have time to do. They typically have been with the department for at least 5-6 years. It takes about 2-3 years for someone to know all the programs so

1. Find rules related to questions their staff has
2. Find updated rules for themselves & staff
3. Communicate updates to their staff
4. Create guide-sheets for their staff
5. Educate/ mentor their staff

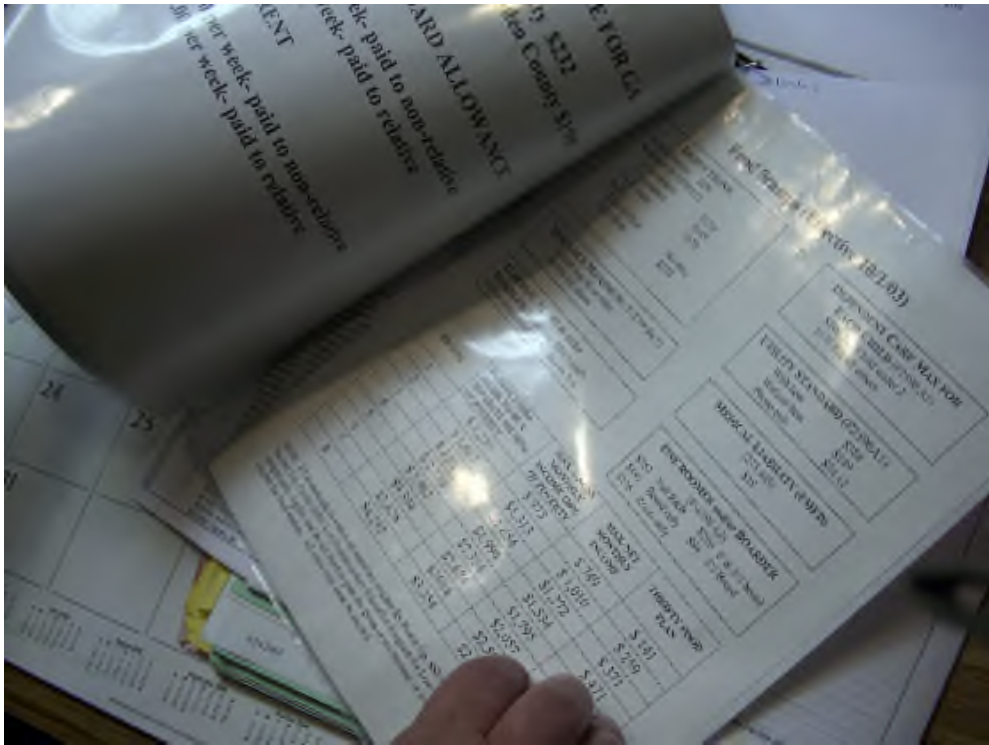
General Users (eligibility specialists)

Most Eligibility Specialists rarely use their books. Many, especially in the districts, do not have their own copies. If they have any questions they first tend to look at their training manual, ask a colleague, look at the intranet at the guide-sheets, FAQ and AHRD training material. As their last resort they will ask their supervisor for a clarification. They find the rule books daunting and do not know how to navigate them. They typically have a 700-900 case load, so how long they spend in each case is critical for them. It is faster for them to ask a supervisor than try to navigate the rules. The average eligibility specialists needs 2-3 years to fully learn all the programs. In the first 6 months of their employment they meet daily with their supervisor and mentor and have them review all their cases.

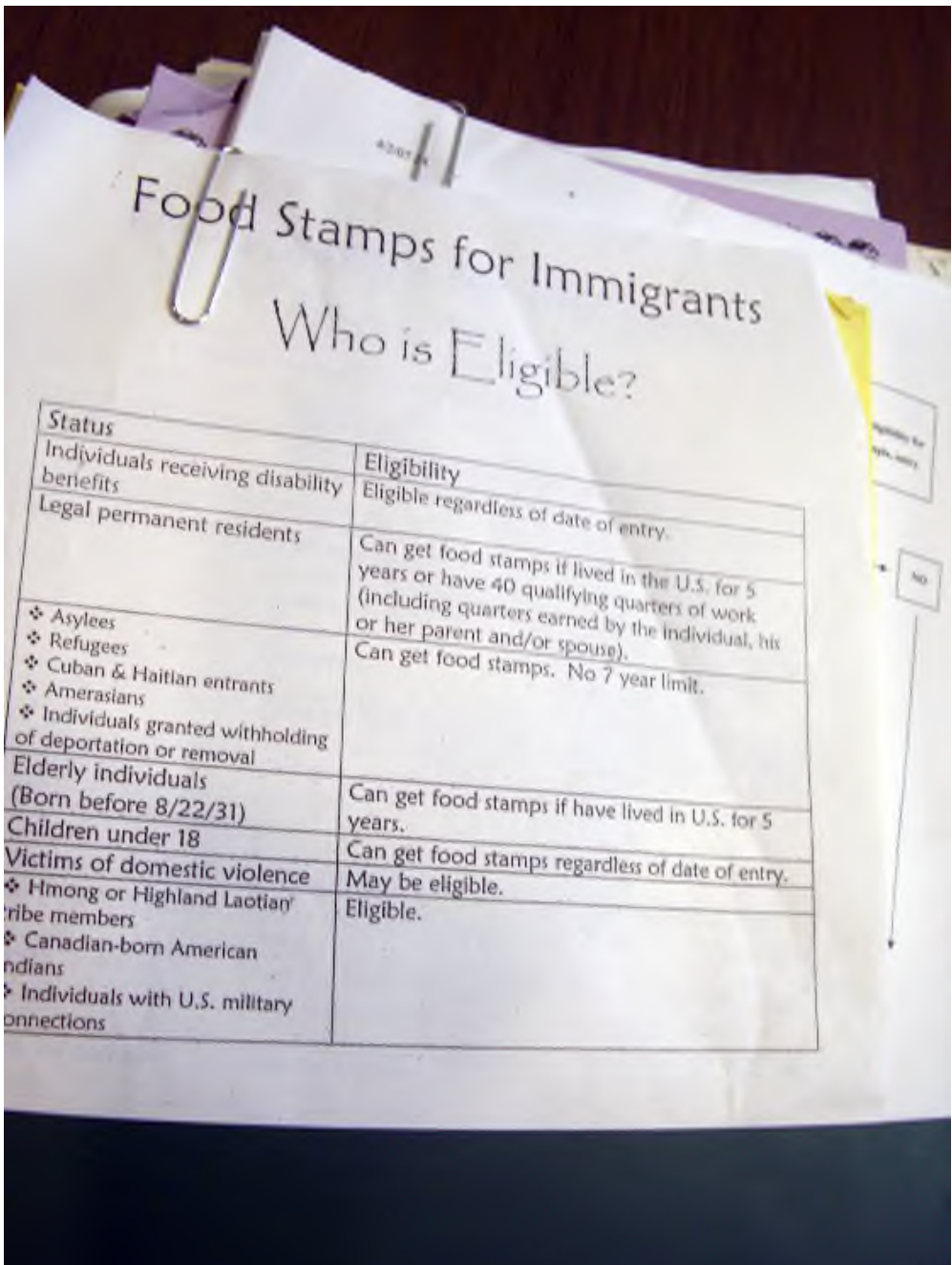
1. Get information on a rule that relates to a case they work on
2. Look up training materials, guide-sheets

Addendum

0.0 Related references



1.0 Food Stamps Guide-Sheets developed by district

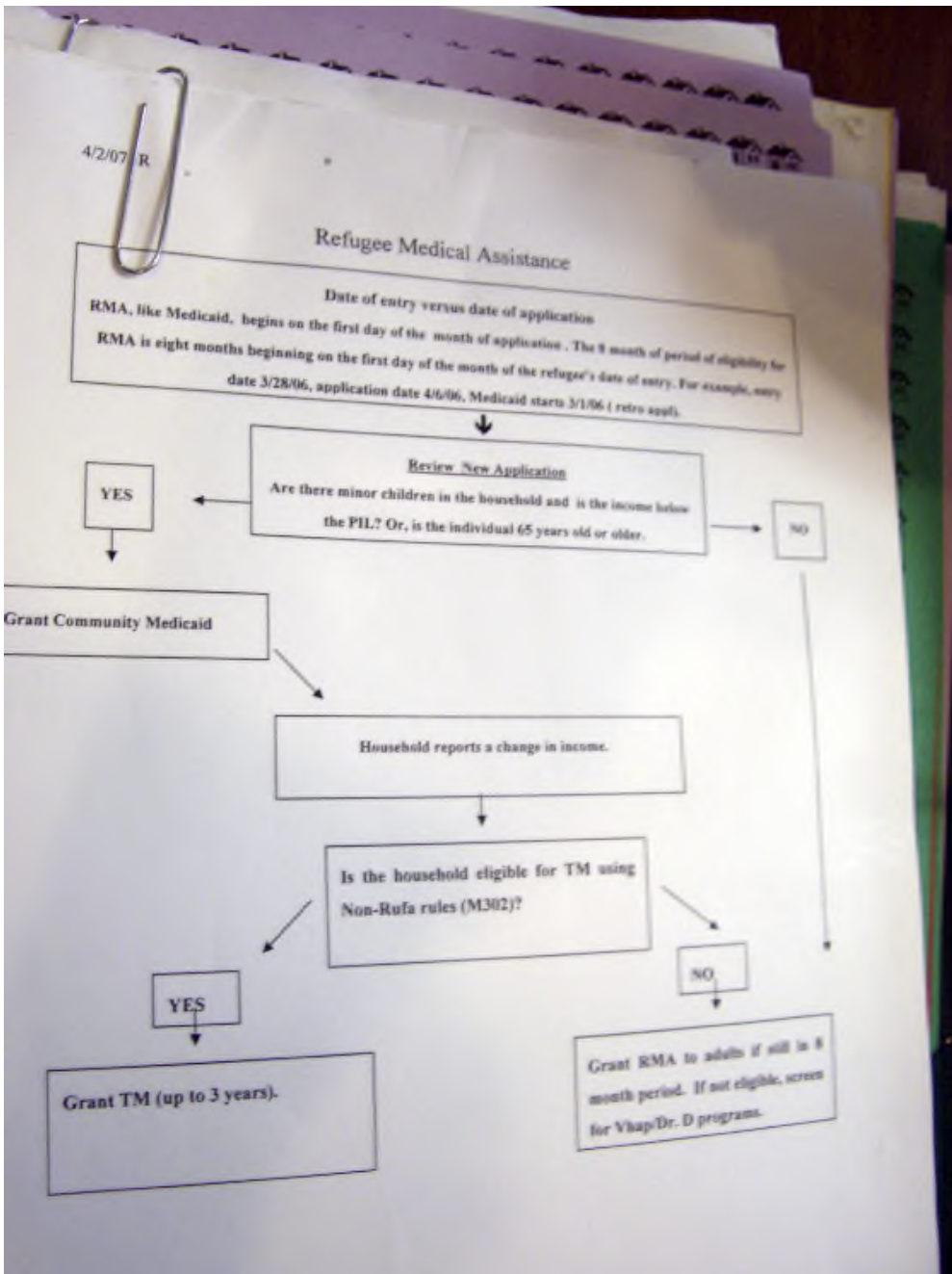


Food Stamps for Immigrants

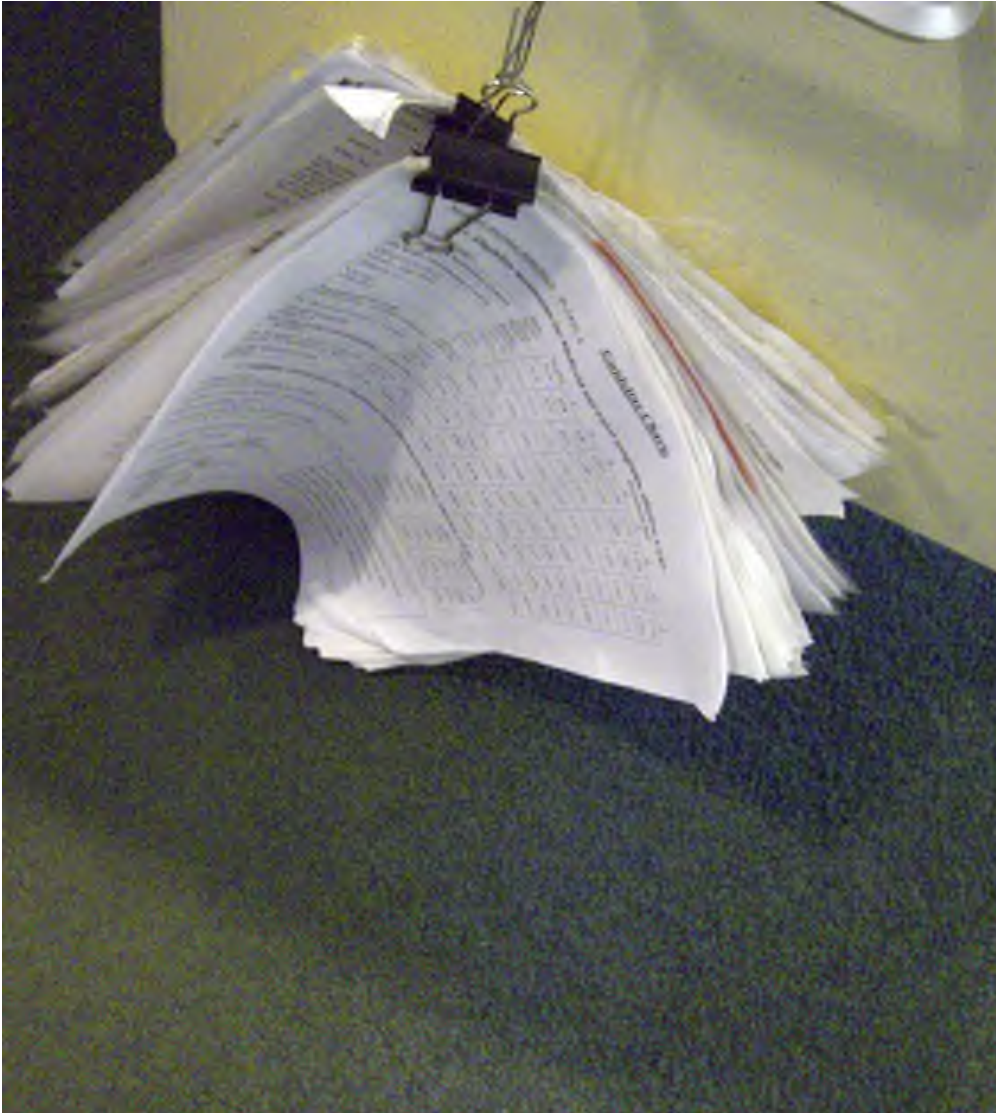
Who is Eligible?

Status	Eligibility
Individuals receiving disability benefits	Eligible regardless of date of entry.
Legal permanent residents	Can get food stamps if lived in the U.S. for 5 years or have 40 qualifying quarters of work (including quarters earned by the individual, his or her parent and/or spouse).
<ul style="list-style-type: none"> ❖ Asylees ❖ Refugees ❖ Cuban & Haitian entrants ❖ Amerasians ❖ Individuals granted withholding of deportation or removal 	Can get food stamps. No 7 year limit.
Elderly individuals (Born before 8/22/31)	Can get food stamps if have lived in U.S. for 5 years.
Children under 18	Can get food stamps regardless of date of entry.
Victims of domestic violence	May be eligible.
<ul style="list-style-type: none"> ❖ Hmong or Highland Laotian tribe members ❖ Canadian-born American Indians ❖ Individuals with U.S. military connections 	Eligible.

1.1 Food Stamps Guide-Sheets developed by district



1.3 Guide-Sheet developed by district to clarify Refugee Medical Assistance Rules



1.4 Frequently used Guide-sheets hanging from desk drawer

To be qualified, the household must be billed for its heating and cooling costs. A household which is otherwise eligible to use the standard allowance between billing which lives in a public housing unit or a household which has central utility meters and charges for excess heating or cooling costs shall not be eligible for the standard utility allowance which includes a cooling component. If a household is not eligible for the standard allowance, it may claim the actual utility allowance, it may claim the actual utility allowance identified in paragraph (d)(5) which it does pay separately.

VERMONT - The State has elected to offer a standard utility allowance for use in calculating shelter costs for households for use in calculating shelter costs.

iii The State agency may elect to develop a utility allowance or seasonal standard utility allowance. If the state agency elects to use a single allowance, it will not be required to develop separate allowances for each season of qualified households which incur excess heating or cooling costs. If the State agency elects to develop separate allowances seasonally, it shall ensure that during the cooling season the standard allowance is provided only to households which incur cooling costs that during the cooling season the standard allowance is provided only to households with cooling costs.

VERMONT - Vermont has elected to use an annualized utility allowance. The standard is located in the P-2590 A Manual.

iv State agencies shall develop methods for determining utility allowances, subject to FNS approval, to be followed in establishing utility allowances. The standard allowance for each season shall be submitted to FNS for approval.

2.0 Highlights on the Vermont interpretation of a rule – often those are buried deep in a document

9.10 Determining Household Eligibility And Benefit Levels (Continued)

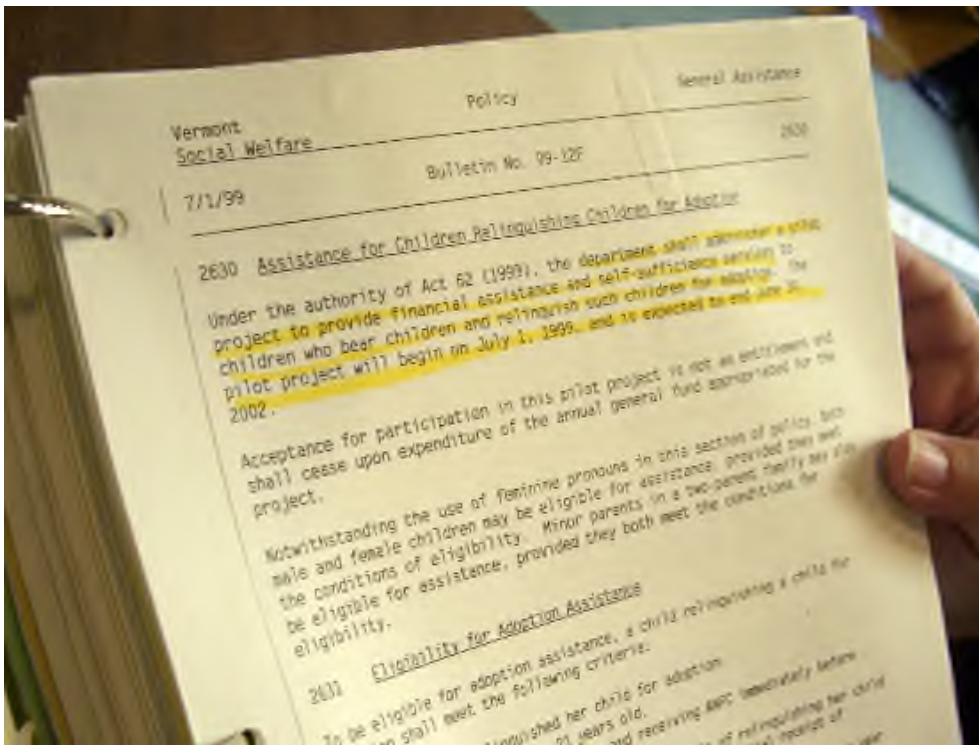
Determining Income

1. Anticipating Income

- 1 For the purpose of determining the household's eligibility and level of benefits, the State agency shall take into account the income already received by the household during the certification period and any anticipated income the household and the State agency are reasonably certain will be received during the remainder of the certification period. If the amount of income that will be received, or when it will be received, is uncertain, that portion of the household's income that is uncertain shall not be counted by the State agency. For example, a household anticipating income from a new source, such as a new job or recently applied for public assistance benefits, may be uncertain as to the timing and amount of the initial payment. These moneys shall not be anticipated by the State agency unless there is reasonable certainty concerning the month in which the payment will be received and in what amount. If the exact amount of the income is not known, that portion of it which can be anticipated with reasonable certainty shall be considered as income. In cases where the receipt of income is reasonably certain but the monthly amount may fluctuate, the household may elect to income average. Households shall be advised to report all changes in gross monthly income as required by §273.12.

- 11 Income received during the past 30 days shall be used as an indicator of the income that is and will be available to the household during the certification period. However, the State agency shall not use past income as an indicator of income anticipated for the certification period if changes in income have occurred or can be anticipated. If income fluctuates to the extent that a 30-day period alone cannot provide an accurate indication of anticipated income, the State agency and the household may use a longer period of past time if it will provide a more accurate indication of anticipated fluctuations in future income. Similarly, if the household's income fluctuates seasonally, it may be appropriate to use the most recent season comparable to the certification period, rather than the last 30 days, as one indicator of anticipated income. The State agency shall exercise particular caution in using income from a past season as an indicator of income for the certification period. In many cases of seasonally fluctuating income, the income also fluctuates from one season in one year to the same season in the next year. However, in no event shall the State agency automatically attribute to the household the amounts of any past income. The State agency shall not use past income as an indicator of anticipated income when changes in income have occurred or can be anticipated during the certification period.

2.1 Important and often used sections highlighted



2.2 Important and often used sections highlighted

6013.2 page indicated below. ... either by a subsequent
 This memo: is new Replaces one dated _____ Effective date of this memo 10/28/05 Page _____
UPDATE:
 For purposes of this section, authorization for temporary housing may include transitional housing assistance in the form of payment up to the first month of rent in a unit that will become permanent and will continue to be affordable for the applicant.
 This payment may be made only if it is equal to or less than the total cost of maintaining temporary housing for the applicant at the averaged highest daily rate (as provided by central office) for the maximum number of days for which the applicant remains eligible at the time the payment would be made. When this type of payment is made it will be the last payment for this occurrence of temporary housing.
 If someone is in temporary housing (this could be an individual or family) based on a catastrophic situation, payment up to the first months rent can be paid to transition the individual or family into permanent housing as long as the payment is less than the cost to keep the individual or family into temporary housing.
 Cost effective - not really for ongoing GA's

3.0 Clarifying note on rule, as understood by district during management meeting

273.9 Income and Deductions (Continued)

d. Income Deductions (Continued)

3. Excess Medical Deduction (Continued)

- v. Medicare premiums related to coverage under the Social Security Act; any cost-sharing or copayments incurred by Medicaid recipients;
- vi. Dentures, hearing aids, and prosthetics;
- vii. Securing and maintaining a seeing eye dog; the cost of dog food and veterinarian bills;
- viii. Eye glasses prescribed by a physician or by an optometrist;
- ix. Reasonable cost of transportation and related treatment or services;

Vermont Note: Allowable transportation costs shall include the cost of pooling, using public transportation, or the cost estimated by the recipient computed on the basis of rates for individuals using their own or a

See actual day care memo 7/16/99

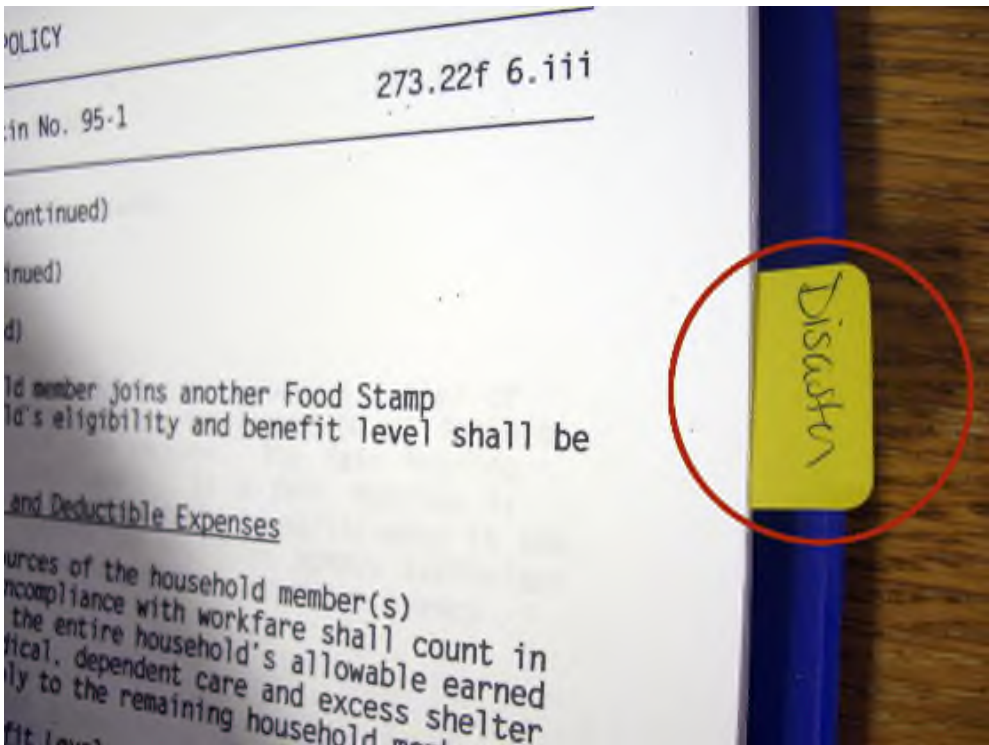
Maintaining an attendant, homemaker, home care services, housekeeper, necessary day care services, or necessary day care services for illness. In addition, an amount equal to the allotment shall be deducted if the household provides the majority of the attendant's meals. The related deduction shall be that in effect at the time of certification. The State agency is only allowed to deduct the allotment amount at the next scheduled certification. At their option, the State agency may deduct the cost of a household that incurs attendant care costs that exceed the medical deduction and dependent care deduction. The State agency shall treat the cost as a

4. Dependent Care

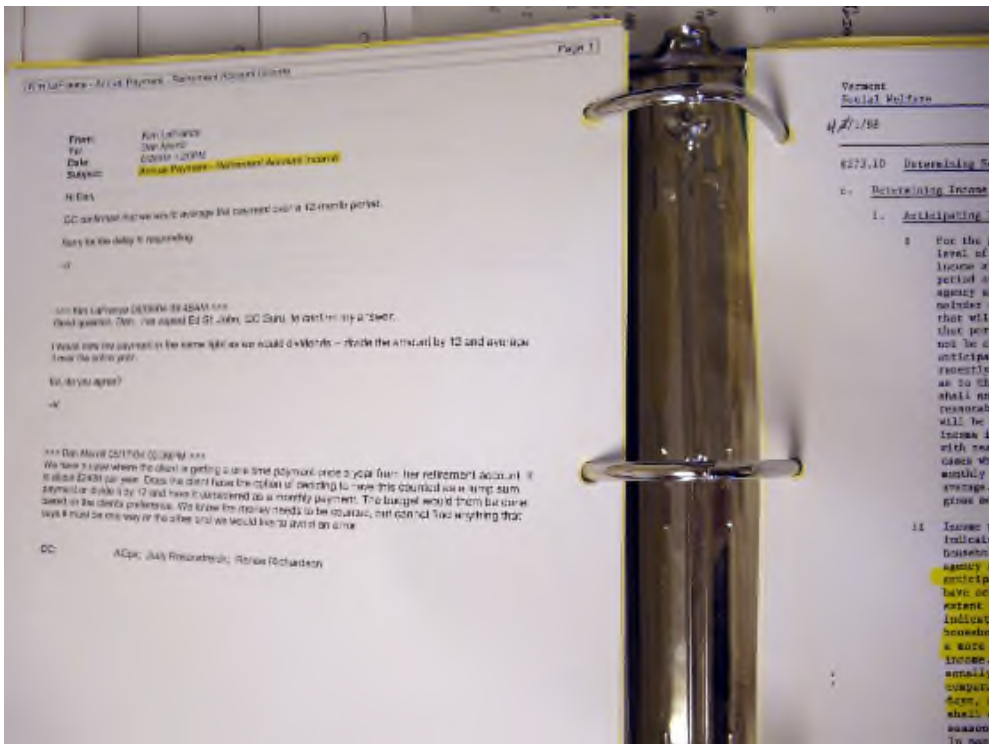
Payments for the actual costs for the care of dependents when necessary for a household member to be employed, to comply with the employment and training requirements specified under 273.7(f), or attend training that is preparatory to employment, except as provided in 273.7(g).

Vermont Note: The maximum monthly dependent care deduction is the amount specified in Section P-2590 A1 of the Welfare Practices Act.

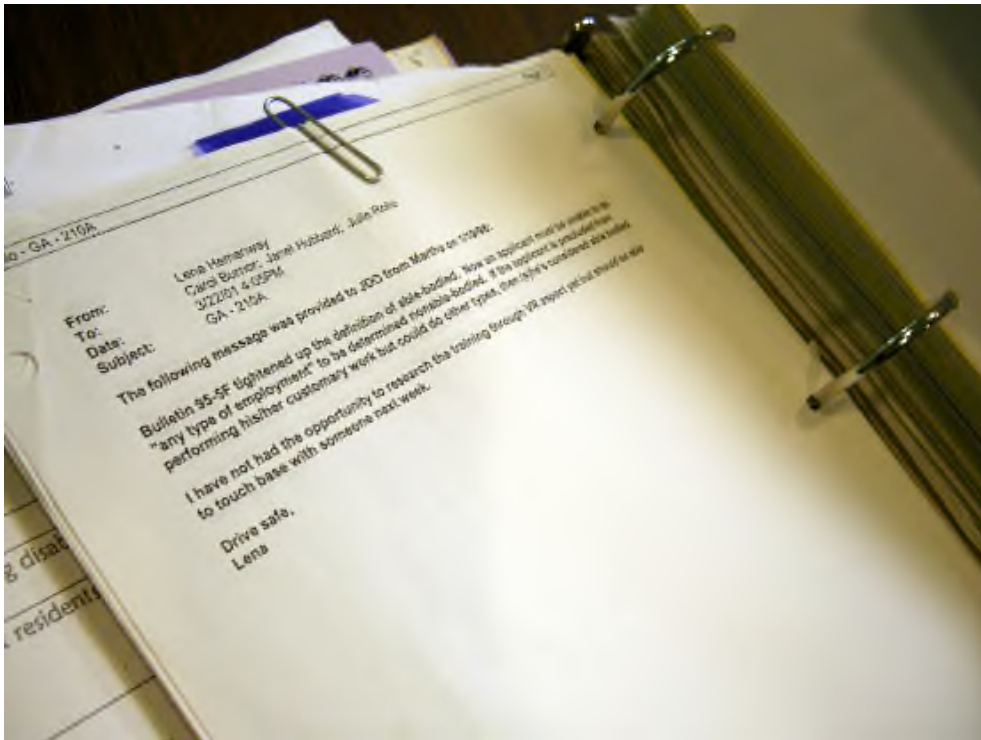
3.1 Reference to related memo



4.0 User created tabs for rule sections



5.0 Clarifying email filed next to related rule



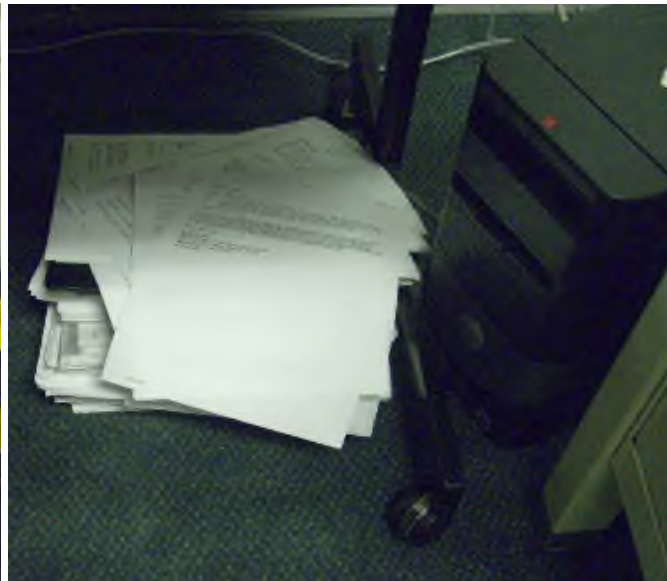
5.1 Clarifying email filed next to related rule



6.0 On the wall Frequently Asked Questions ...



6.1 Variation of the on the wall Frequently Asked Questions ...



6.2 The paper-full office: piles are organized according to program



7.0 District Library where updated rules and procedures are kept. Few Specialists use them.