



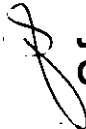
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Field Operations Memo 97-9
March 10, 1997

To: Local Office Staff

From:  Joyce Sampson, Assistant Commissioner for Field Operations

Re: Food Stamp Program - Federal Welfare Reform Changes to Expedited Service

Overview

State Letter 1108 dated 1/1/97 transmitted the following Food Stamp Program changes which were made as a result of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA).

- ▶ The expedited service processing standard has been increased from five days to seven days.
- ▶ Homeless households are no longer considered Special Expedited Service Households.

This Field Operations Memo will provide an overview of application processing requirements and discuss the federal welfare reform changes to expedited service in the context of application processing.

Obsolete Materials

Field Operations Memo 95-16 is now obsolete. Field Operations Memo 97-9 updates the information contained in Field Operations Memo 95-16 to reflect the changes to expedited service processing.

Food Stamp Application Processing Overview

Filing an Application

All applicants must be advised and encouraged to file applications on the same day the household contacts the Department in person, by telephone or in writing. If a household requests an application form by telephone or in writing, an application form must be mailed to the household the same day as the request.

Office hours for accepting food stamp applications or making food stamp applications available must not be restricted. Each local office must maintain a daily log of walk-in applicants.

The household may file an incomplete application as long as the application form contains the applicant's name and address and is signed and dated by a member of the household. An incomplete application will preserve the filing date for food stamp benefits.

Neither a telephone contact nor written request will preserve the filing date for food stamp benefits. The date a mail-in application or Request for Assistance, RA-1 (Rev. 12/96) form is received by the appropriate local office is the application filing date. Mail-in applications are subject to both the seven-day expedited service and normal 30-day processing standards.

Record the application filing date by date-stamping the application or RA-1 form on the day received at the appropriate local office. **Both walk-in and mail-in applications and RA-1 forms must be date-stamped upon receipt.**

Interpreters

An applicant whose primary language is not English or who uses American Sign Language (ASL) shall be provided interpreter services by the Department, in accordance with Department regulations. (See 106 CMR 201.360; 106 CMR 301.360; 106 CMR 318.360 or 106 CMR 360.510.)

Note: The seven-day expedited service and normal 30-day processing timeframes are in effect for households in need of interpreter services.

Food Stamp Application Processing Overview (Continued)

**Application
Interviews**

A face-to-face interview is required for all food stamp applicants unless waived. (See 106 CMR 361.500.) Interviews need not be held on the day of initial contact with the Department. However, each applicant will be screened to determine if the household meets any of the expedited service criteria on the application filing date. Interviews must be scheduled as soon as possible to ensure that the appropriate time standards for application processing can be met. If the applicant fails to attend a scheduled application interview, it is the applicant's responsibility to reschedule.

If the applicant missed the first interview but contacted the worker to reschedule, a second application interview must be scheduled within the 30 calendar days following the application filing date. If the second application interview cannot be scheduled until after Day 20 (due to household's request or lateness of contact), the applicant must appear for the application interview, submit verifications requested on the Verification Checklist (VC-1) and complete the Work Requirement Registration (FS-WR) form by Day 30. If the household does not meet these requirements, a Notice of Pending/Denial (FSNL-2) must be sent on the 30th calendar day after the application filing date and the delay shall be the fault of the household. If the second application interview is postponed at the household's request, the delay shall be the fault of the household. (See 106 CMR 361.940.)

**Verification
of Requested
Information**

The worker must complete the VC-1 at the application interview. The worker must offer to help the applicant obtain needed information and advise the applicant to call if he or she has difficulty getting required verification. Alternative forms of verification should be identified, if necessary. Notify the applicant of the date that verifications must be submitted and record that date on the VC-1. Date-stamp each verification on the day received.

Note: A general VC-1 may be given to an applicant in preparation for the application interview. However, the ten-day clock for denying an application does not begin until a VC-1 is completed during the application interview which identifies the information actually needed for the *particular household* to establish eligibility.

Expedited Service

Some households are entitled to faster processing called expedited service. Determining eligibility for expedited service is a **two-step** process.

Step One: Does the Household Qualify for Expedited Service?

Screening for Expedited Service

All NPA and PA households applying for food stamp benefits must be screened using the RA-1 on the application filing date to determine if the household qualifies for expedited service. The RA-1 must be completed for all NPA and PA applicants.

The RA-1 has been revised to reflect the federal welfare reform changes. The form references the seven-day expedited processing timeframe. The expedited service criterion regarding homelessness has been removed since homeless households no longer *automatically* qualify for expedited service.

Note: A homeless household may qualify for expedited food stamp benefits if any of the other expedited service criteria are met.

The RA-1 now contains a notice to applicants of their right to an agency conference regarding expedited service denial or delay in issuing expedited service benefits beyond Day 7. (See 106 CMR 367.225.)

The worker must review the expedited service criteria with each applicant on Day 1 to determine if the household qualifies for expedited service; This review includes explaining the expedited service questions to the applicant and eliciting information from the applicant to determine if any of the expedited service criteria apply to the household.

Example: If the household does not include migrant/farm workers, and the household's gross income is greater than \$150, the worker must ask questions about the household's liquid assets and shelter expenses to determine if the household meets the first expedited service criteria. The worker will also have to explain terms such as *liquid* assets to the applicant.

Note: For food stamp purposes, gross monthly income, include all countable income (terminated, current and anticipated) received during the cyclical month of application.

Expedited Service (Continued)

**Applicant
Qualifies for
Expedited
Service**

If, after reviewing the expedited service criteria with the applicant, the worker determines that the household qualifies for expedited service:

- ▶ the appropriate application will be completed on the application filing date (Day1), if time permits; *or*
- ▶ an interview to complete the appropriate application will be scheduled within the seven-day expedited timeframe.
 - For a system-generated expedited ATP to be timely the interview must be scheduled no later than the fourth calendar day following the application filing date (Day 1-5).
 - For an over-the-counter expedited ATP to be timely the interview must be scheduled no later than the sixth calendar day following the application filing date (Day 6-7).

Note: On Day 1, an effort must be made to determine whether the food stamp household should be PA or NPA so that the application interview will be scheduled with the appropriate worker.

**Applicant Does
Not Qualify for
Expedited
Service**

If, after reviewing the expedited service criteria with the applicant, the worker determines that the household does not qualify for expedited service, inform the applicant that he/she is not entitled to expedited service. Notify the applicant of the right to an agency conference to contest the denial of expedited food stamp benefits.

For ARTS tracking purposes:

- enter the date the RA-1 was completed in Block 23: Exfs Date; and
- enter N (not eligible) in Block 24: Exfs Code.

Process the food stamp application in accordance with normal 30-day standards.

Expedited Service (Continued)

**Step Two:
Does the
Household
Appear Eligible
for the Food
Stamp
Program?**

If, the worker determines in Step One that the applicant meets one of the expedited service criteria, the household must attend the scheduled application interview (unless waived) within the seven-day expedited timeframe, complete the appropriate application and provide *necessary* verification. The worker must help the household complete the appropriate NPA or PA application. The worker must also offer to help the household obtain required verification, if needed.

The completed application will provide information regarding household composition, income, assets, living expenses, citizenship, etc. to determine if the household appears eligible for the Food Stamp Program. Collect as much verification regarding food stamp eligibility as possible. However, *identity* is the only eligibility factor that must be verified within the seven-day expedited timeframe. Lack of verifications other than identity, during the seven-day expedited timeframe, must not delay the determination for expedited service.

ARTS Coding: Missed Application Interview during Seven-Day Timeframe

If the applicant fails to attend the scheduled interview to complete the application during the seven-day expedited timeframe, the applicant is ineligible for expedited service. For ARTS tracking purposes:

- enter the date the decision is made that the applicant is not eligible for expedited service in Block 23 Exfs Date; and
- enter N (not eligible) in block 24: Exfs Code.

Note: You must wait until Day 7 to make a decision regarding expedited service.

If the applicant does not contact the office to reschedule the application interview within 30 days, deny the food stamp case on the 30th calendar day following the application filing date.

Expedited Service (Continued)

If the applicant contacts the office to reschedule the application interview within the 30-day timeframe and at the interview it appears that the applicant is eligible for expedited service, expedited food stamp benefits must be issued within seven days from the date of the rescheduled interview provided verification of identity has been submitted. *Do not make any entries on ARTS. ARTS does not capture subsequent expedited service discovery information. Clearly document in the case record the following information: date of second interview and reason for expedited service eligibility. Photocopy proof of identity.*

ARTS Coding: Failure to Verify Identity within Seven-Day Timeframe

If the worker offered to help the household obtain required verification at the application interview and the applicant fails to provide verification of identity within the seven-day expedited timeframe, the applicant is ineligible for expedited service. For ARTS tracking purposes:

- enter the date the decision was made that the applicant is not eligible for expedited service in Block 23: Exfs Date; and
- enter N (not eligible) in Block 24: Exfs Code.

Note: You must wait until Day 7 to make a decision regarding expedited service.

If the applicant does not contact the local office within the 30 day time-frame, deny the food stamp case on the 30th calendar day following the application filing date.

If the applicant brings in verification of identity within the 30-day timeframe, and it appears the applicant is eligible for expedited service, an expedited ATP must be provided within seven calendar days from the date verification is received. *Do not make any entries on ARTS. ARTS does not capture subsequent expedited service discovery information. Clearly document in the case record the date identity verification was received and photocopy proof of identity.*

Expedited Service (Continued)

**Household
Appears
Ineligible for the
Food Stamp
Program**

If, during the application interview, the worker discovers information which makes the household ineligible for the Food Stamp Program, the household is not eligible for expedited service. Inform the applicant that they are not entitled to expedited service. Notify the applicant of the right to an agency conference to contest the denial of expedited food stamp benefits. For ARTS tracking purposes:

- enter the date the ineligibility decision was made in Block 23, Exfs Date; and
- enter N (not eligible) in Block 24: Exfs Code.

Examples:

- (1) NPA applicant owns a non-exempt car. The countable Fair Market Value of the car is over the Food Stamp Program asset limit. The applicant appears ineligible for food stamp benefits, and is consequently ineligible for expedited service. Deny the case, if an ineligibility determination can be made. Continue to process this case under 30-day timeframes, if there are outstanding issues, i.e., applicant wishes to get lower estimate of car value.
 - (2) TAFDC/FS applicant presents verification of Legal Permanent Resident status but does not have Qualifying Work Quarters for food stamp purposes. The applicant, ineligible for the Food Stamp Program, is likewise ineligible for expedited service. Deny the food stamp case and continue processing the cash case in accordance with PA timeframes.
-

Issuing Expedited Food Stamp Benefits

Expedited 7-Day Timeframe

A household eligible for expedited service must be given an opportunity to participate within seven calendar days following the date of application. Opportunity to participate means that the household must have an ATP in-hand with facilities open and available for the household to cash the ATP.

To ensure that the household has an opportunity to transact the ATP by the seventh calendar day following the application filing date:

- ▶ A system-generated expedited ATP must be data-entered no later than four calendar days following the date of application (Day 1-5).

Note: PACES has been programmed to not allow a system-generated expedited ATP to be data-entered more than four days after the application filing date. Message will read: *Must do OTC/ATP.*

- ▶ An OTC expedited ATP must be issued to the household no later than the sixth calendar day following the date of application (Day 6-7).

If the sixth calendar day following the date of application falls on a holiday, the following rules apply to ensure that the household has the opportunity to participate by the seventh calendar day following the date of application.

- ▶ If the sixth calendar day following the application filing date is a holiday which falls on a Monday, the ATP must be issued on the previous Friday.
- ▶ If the sixth calendar day following the application filing date is a holiday which falls on a Friday, the ATP must be issued on the previous Thursday.

Note: If a household is determined eligible for an expedited ATP during the last days of the month (i.e., May 29), notify the applicant that the ATP will expire on the last day of the month and must be transacted *immediately* to avoid the need of a replacement.

Issuing Expedited Food Stamp Benefits (Continued)

**Responsibility
for Issuing
Expedited Food
Stamp Benefits**

The following scenarios illustrate which worker is responsible for issuing expedited food stamp benefits.

- The household applies for food stamp benefits only. The NPA worker is responsible for issuing expedited food stamp benefits to the household, if eligible for expedited service.
- The household applies for cash and food stamp benefits, appears to be eligible for cash, but is determined to be an NPA food stamp household. The NPA worker is responsible for helping the household complete the NPA application and issuing expedited food stamp benefits to the household within the seven-day expedited timeframe, if eligible for expedited service.
- The household applies for cash and food stamp benefits, but is determined to be a PA/FS household. The PA worker is responsible for issuing expedited food stamp benefits to the household within the seven-day expedited timeframe, if eligible for expedited service.
- The household applies for cash and/or food stamp benefits but is determined to be linked to (part of or should be part of) an existing food stamp case (NPA or PA). The household is not eligible for expedited service since (1) the household is already receiving food stamp benefits in another case or (2) the household cannot be a separate food stamp household based on household composition rules. Notify the worker assigned to the existing food stamp case of the additional household member(s) so that the appropriate action can be taken on that case.

For ARTS tracking purposes:

- enter the date the decision was made that the applicant is ineligible for expedited service in Block 23: Exfs Date;
 - enter N (not eligible) in Block 24: Exfs Code; and
 - enter L (Linked to existing food stamp case) in Block 22: FS Status.
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Issuing Expedited Food Stamp Benefits (Continued)

Note: If this household which is linked to (part of or should be part of) an existing food stamp household wishes to file a separate application, help the household complete the application. If food stamp household composition rules do not allow this household to be separated from the existing case, deny the food stamp application citing 106 (CMR 361.200). Notify the worker assigned to the existing food stamp case of the additional household member so that the appropriate action can be taken on that case. For ARTS tracking purposes: enter the date the decision was made that the applicant is ineligible for expedited service in Block 23: Exfs Date, enter N (not eligible) in Block 24: Exfs Code and enter D (Denied) in Block 22: FS Status.

**Future
Expedited
Certification**

There is no limit to the number of times a household can be certified under expedited procedures. However, **before each expedited certification**, the household must either:

- have provided verification(s) that was postponed at the time of expedited certification **regardless of the amount of time that has gone by**; or
- have been certified under normal processing standards since the last expedited certification.

Example:

March 1997	DAY 1	RA-1 Completed
	DAY 3	Application Interview VC-1 Completed Help Offered
	DAY 4	Expedited FS Benefits Issued
	DAY 30	Case Denied Failure to Verify

June 1997 Applicant reapplies. Applicant **cannot** be certified under expedited procedures until identity plus all verifications requested but postponed in March are provided within the seven-day expedited timeframe.

Issuing Non-Emergency Food Stamp Benefits

Normal 30-Day Timeframe

If the worker determines in Step One that the applicant does not meet any of the expedited service criteria, an appointment to complete the appropriate application must be scheduled. Non-emergency households must be given the opportunity to participate in the Food Stamp Program no later than 30 calendar days following the application filing date. An **Opportunity to Participate** means that the household must have an ATP in-hand, with facilities open and available for the household to transact the ATP.

To ensure that the household has an opportunity to transact the ATP by the 30th calendar day following the application filing date:

- A system-generated initial ATP must be data-entered on or before **Day 28**; or
- An OTC initial ATP must be issued to the household no later than the **30th calendar day following the date of application**.

Note: Always revert to an OTC initial ATP if there is a question of the household's ability to transact the ATP by the 30th calendar day following the application filing date.

Data entry and mailing time must be considered when issuing initial food stamp benefits. Workers must also keep in mind Saturday, Sunday and holiday interruptions.

If the 30th calendar day following the date of application falls on a Saturday, Sunday or holiday, the following rules apply to ensure that the household has the opportunity to transact the ATP by the 30th calendar day following the date of application:

- If Day 30 is a Saturday, Sunday or holiday which falls on a Monday, the ATP must be issued on or before the previous Friday.
 - If Day 30 is a holiday which falls on a Friday, the ATP must be issued on or before the previous Thursday.
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Issuing Non-Emergency Food Stamp Benefits (Continued)

Do not forget that system-generated initial ATPs data-entered after the ATP Cutoff Date will be held until the first business day of the following month. An OTC initial ATP must be issued during the ATP Cutoff period. Refer to the PACES Case Closing and Reduction Schedule in *Systems User's Guide, Volume 1, PACES, Appendix E-5* for the ATP Cutoff Date.

The following examples illustrate important time considerations when issuing an initial ATP.

Example: System-Generated Initial ATP

On the 20th calendar day after applying, an applicant brings in all required verifications and is determined eligible for food stamp benefits. The worker should complete the necessary PID and/or Worksheet immediately. Since there is 48-hour turnaround time for system-generated ATPs, submit the PID and /or Worksheet no later than Day 28.

Example: OTC Initial ATP

- (1) The applicant brings in required verifications on Day 29. If eligible for food stamp benefits, an OTC initial ATP must be given to meet the 30-day deadline. (A system-generated initial ATP would be untimely due to the 48-hour turnaround.)
- (2) The applicant brings in requested verifications on the ATP Cutoff Date. If a system-generated initial ATP would be untimely, an OTC initial ATP must be issued. For example,

SSN = 0
Cycle Start = 1

Application Date 3/2
Interview Date 3/7
Date Verification Received 3/28
ATP Cutoff Date 3/24

OTC Initial ATP should be issued between 3/28 - 3/31.

An FSP-14B must be completed when an OTC initial ATP is issued. Check Block 6 if OTC Initial ATP has been issued because a system-generated ATP would be untimely.

**Subsequent
Discovery of
Expedited
Service
Eligibility**

Issuing Non-Emergency Food Stamp Benefits (Continued)

If, during the 30-day processing timeframe, the worker discovers information which entitles the household to expedited service, the household must be provided with an expedited ATP within seven calendar days following the date of discovery. *Do not make any entries on ARTS. ARTS does not capture subsequent expedited service discovery information. Clearly document in the case record the following information: date of discovery, reason for expedited service eligibility, and date expedited food stamp benefits were issued.*

Denial Rules for Food Stamp Applications

Households found ineligible shall be sent a Notice of Denial as soon as possible, but no later than the 30th calendar day following the date the application was filed.

- (1) If the household fails to appear for one scheduled interview and makes no subsequent contact with the local office to reschedule the missed interview, the application shall be denied on the 30th calendar day after the application filing date. When an application is denied for this reason, the household must file a new application to participate in the Food Stamp Program.
 - (2) In cases where the interview was conducted and all necessary verification was requested on the day the application was completed, a Notice of Denial may be sent no sooner than the 10th day nor later than the 30th day if the household failed to submit the requested verification provided:
 - (A) the household received a statement of required verification, Verification Checklist (VC-1) and was notified of the date that verifications must be submitted; and
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Denial Rules for Food Stamp Applications (Continued)

- (B) the Department offered to help the household obtain needed verification as required in 106 CMR 361.900.

If the household complies after the 10th day but before the 30th day, the application must be reopened and benefits provided back to the date of application for eligible households. Delays beyond 30 days must be handled in accordance with 106 CMR 361.900.

Example: Household Complies On / Before Day 30

On Day 1 the RA-1 and food stamp application is completed. All verifications are requested on the VC-1 and the worker offered help with obtaining needed verifications on the same day. On Day 11, the applicant fails to bring in required verifications. A notice of Pending/Denial (FSNL-2) may be sent to the household no earlier than Day 12 (10 days after verifications requested) nor later than the 30th calendar day after the application filing date.

Example: Household Complies After Day 30

On Day 1 the RA-1 is completed and an interview scheduled for Day 7. The household is interviewed, the food stamp application is completed, all verifications are requested on the VC-1 and the worker offered to help with obtaining needed verifications. The household fails to bring in required verifications on Day 17. An FSNL-2 may be mailed to the household no earlier than Day 18 (10 days after the application was filed).

If on Day 20 the FSNL-2 is sent, and on Day 40 the household brings in all requested verifications, the worker must make a determination of fault, clearly document the cause of delay in the case record and process the case in accordance with 106 CMR 361.900 et seq.

How to Deny a Food Stamp Case

NPA Case

- (1) If the household is determined ineligible for food stamp benefits, a Notice of Denial must be sent to the applicant as soon as possible, but no later than 30 calendar days following the application filing date.
- (2) If the household fails to appear for a scheduled interview and makes no subsequent contact with the office, the application must be denied on the 30th calendar day following the application filing date.
- (3) If the household fails to bring in required verifications, an FSNL-2 must be mailed to the household. The FSNL-2 may be mailed between Day 10 and Day 30, depending on the date the application was completed and all verifications requested.

PA/FS Case

- (1) If on Day 30, the household fails to bring in verifications required for both programs, and no extension has been requested for the cash case, send the NFL-5 denying both cash and food stamp benefits.
 - (2) If on Day 30, the household fails to bring in verifications required for both programs and an extension has been requested (INT-2 returned) for the cash case, an FSNL-2 for the food stamp case must be sent.
 - (3) If on Day 30, the household fails to bring in verifications required for cash and no extension has been requested *but* all verifications have been submitted for food stamp purposes, send the NFL-5 denying the cash case only. The PA worker must complete a PID and/or Worksheet to open the Category 9 food stamp case with a one month certification period, if eligible. It is the responsibility of the PA worker to forward all relevant food stamp information to the appropriate NPA unit.
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How to Deny a Food Stamp Case (Continued)

- (4) If on Day 30, the household fails to bring in verifications required for food stamp purposes, send an FSNL-2.
- (5) If the household is determined ineligible for cash assistance, send the NFL-5 denying the cash case only. The PA worker must complete PID and/or Worksheet to open the Category 9 food stamp case with a one-month certification period, if eligible. It is the responsibility of the PA worker to forward all relevant food stamp information to the appropriate NPA unit.

Note: The 10-day denial rule can be applied to the food stamp portion of a PA/FS case. However, it will not be practical for PA workers since it is unlikely that the cash case will be denied simultaneously due to different processing standards between the programs.

Questions

Policy questions should be referred to the Policy Hotline at (617) 348-8478. Systems questions should be referred to Systems Customer Support Services at (617) 348-5290.
