

Commonwealth of Massachusetts Executive Office of Health and Human Services Department of Transitional Assistance

JOHN W. POLANOWICZ Secretary

STACEY MONAHAN Commissioner

Operations Memo 2014-57 October 10, 2014

To: Department of Transitional Assistance Staff

From: Anne O'Sullivan, Assistant Commissioner for Policy, Program and

External Relations

Re: TAFDC, EAEDC and SNAP – DOR Bank Match

Overview

The DOR Bank Match is run on a monthly basis and is one of the match groups appearing on the Match History tab. With BEACON Build 46.3 and the implementation of Program Integrity (PI) Checklist functionality, DOR Bank Match data began to appear as pending on the PI Checklist, and a hard edit was created, preventing caseworker actions on the Interview Wrapup page when matches identified on the PI Checklist are not dispositioned.

Purpose of Memo

This Operations Memo has been issued to advise staff of changes to the DOR Bank Match process as a result of implementation of the Program Integrity (PI) checklist functionality in BEACON and advises DTA staff about:

- the Bank Match:
- Fraud Investigation Data Match (FIDM) Unit's processing of these matches; and
- caseworker responsibilities.

Obsolete Memo

Operation Memo 2013-31: *TAFDC*, *EAEDC* and *SNAP – DOR Bank Match* is now obsolete.

DOR Bank Match Process

The DOR Bank Match runs monthly and is **not** considered verified upon receipt. When the DOR Bank Match data is matched to a household member in an active, pending or ineligible status and the asset information received is not an exact match with the data on the Liquid Assets page, the data will appear as pending on the PI Checklist and can be accessed through the Detail icon on the PI Checklist and through the Match History tab. DOR Bank Match data is also available through the Assets Q&A Navigator by clicking the Ext Data...button next to the Liquid Assets radio button.

FIDM Responsibilities

FIDM staff are responsible for processing these matches based on existing policy.

Once FIDM staff receive information about a client's bank account, they will send the client a BEACON generated *Bank Verification Notice* requesting verification of the information, including account balances. If the client verifies the account information, FIDM staff will enter the account information on the Liquid Asset page on BEACON and perform an Interview Wrapup to determine eligibility, which may result in case closure. The action taken will be entered on the Narrative tab and the match dispositioned through the Match History tab using one of the following match disposition reasons:

- Add (record is unknown and copy the record to the appropriate page);
- Update (record is already known and will import current data);
- Already known to BEACON (record is current in BEACON);
- Terminated asset (account closed); or
- SNAP cat el not countable (only to be used for non-SNAP categorically eligible households).

If the client's assets are in excess of program limits FIDM staff will determine whether or not an overpayment occurred and refer the case for recoupment as necessary. If the client provides information that indicates possible fraud or a possible transfer of assets, a referral must be made to the Bureau of Special Investigations (BSI).

If the client does not verify the information, FIDM staff will close the case for failure to provide verifications and update the Narrative tab with the action taken. The match must not be dispositioned until verification is received.

DOR Bank Match Process (continued)

FIDM Responsibilities If the client later provides verification that the bank account:

- is below the program limit (including any other assets), and the case is pending to close, and the client can verify that a transfer of assets has not occurred, the closing will be pulled;
- is below the program limit (including any other assets) and the case has closed, the client must verify the balance on the account and that a transfer of assets has not occurred, the case will be reopened; and
- is no longer active and the case is pending to close and the client can verify the asset closing date and that a transfer of assets has not occurred, the closing will be pulled.

Case Manager Responsibilities

If a client whose case was closed due to a DOR Bank Match states that the bank account is no longer active, the client must reapply/be reinstated for benefits only after verifying the asset closing date and that a transfer of assets has not occurred.

If the client transferred the bank asset to restore his or her eligibility for the cash program, he or she is ineligible for benefits. See 106 CMR 204.135 for TAFDC and 106 CMR 321.135 for EAEDC for transfer of assets rules. A referral to FIDM must be made to determine whether or not such a transfer has occurred.

With BEACON Build 46.3, effective June 16, 2014, hard edits displayed on the Interview Wrapup Authorization page prevent caseworker actions when the PI Checklist displays matches that have not been dispositioned. Manager override is available to authorize case actions if necessary.

Whenever a client contacts the case manager to ask about any case action that FIDM has taken as a result of the DOR Bank Match or a case manager is alerted to the fact that an outstanding DOR Bank Match exists, a referral must be made to the FIDM Unit. For detailed information about how to contact the FIDM Unit, see Operations Memo 2014-36, pages 27 and 28.

Annual Reporting, TBA, and Bay State CAP Cases As these matches are **not** considered verified upon receipt, outstanding Bank Matches for household members of active SNAP cases that are Annual Reporting (AR) or Transitional Benefits Alternative (TBA) certification types cannot be acted on unless the IR or Recertification form has been generated and there are at least ten days until the closing date for the IR or the recertification period end date.

No action is required for Bay State CAP cases.

Questions

If you have any questions, please have your Hotline designee call the Policy Hotline.