



Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Transitional Assistance
600 Washington Street • Boston, MA 02111

MITT ROMNEY
Governor

KERRY HEALEY
Lieutenant Governor

RONALD PRESTON
Secretary

JOHN A. WAGNER
Commissioner

Field Operations Memo 2003-5
February 3, 2003

To: Transitional Assistance Office Staff

From:  Cescia Derderian, Assistant Commissioner for Field Operations

Re: Impact of State Letter 1247 on EA Assistance Units

Overview

This memo provides information on four topics found in State Letter 1247 that impact EA eligibility. State Letter 1247 is effective February 3, 2003.

1. SSI income is now countable income for EA purposes
 2. Additional 30 days of shelter when income exceeds EA Eligibility Standard
 3. Relationship to the needy child changes
 4. 12-month rule changes
-

SSI Income Is Countable Income

Background

This memo provides instructions for reviewing the EA eligibility for EA AUs in shelter that have been identified as having income that appears to exceed the EA Eligibility Standard and part of the AU's income is SSI income. SSI income is countable in determining EA eligibility as of February 3, 2003, see State Letter 1247.

Also, this memo includes special instructions for calculating the date the EA benefits will be terminated.

Report - SSI AUs

An initial report, *Shelter AUs with SSI Income Countable =Ineligible*, has been produced and faxed to TAOs that have EA AUs identified as potentially having a total income (earned and unearned with SSI income) that exceeds the current EA Eligibility Standard.

The specific offices are:

Boston Family Housing, Brockton, Fall River, Holyoke, Hyannis, Malden, New Bedford, North Shore, Springfield-Liberty and Taunton.

A second report listing additional EA AUs will be faxed next week. TAOs receiving the report will be notified.

AU Manager or Homeless Coordinator Responsibilities for AUs with SSI Income

Although the name of the EA AU appears on the report, the current income information must be confirmed before any action is taken to terminate shelter benefits. The AU Manager or Homeless Coordinator must schedule an appointment to complete an assessment with the grantee of the EA AU. If other EA AUs, not listed on the report, are known to have SSI income which would make the EA AU ineligible, the grantees of those EA AUs should also be scheduled for assessment appointments.

During the interview with the EA AU, it is very important that the AU Manager or Homeless Coordinator explain that the grantee will be allowed 30 days from the date of the assessment interview to find other housing before shelter benefits are terminated. During the 30 days, there will be **intensive** housing search activities with HAP, including cooperation from DHCD to obtain a Section 8 voucher to a family that needs a voucher. HAP providers serving the EA AUs in the specific shelters have been alerted to the potential EA terminations and the need for intensive housing search activities for these EA AUs.

Make sure the grantee understands that, if found to be ineligible, shelter benefits will be terminated and that it is in the best interest of the family to do everything possible during these 30 days to secure housing.

Every effort should be made **to mail the notice of an assessment appointment by 2/7/2003** and to schedule the appointment with the EA AU as soon as possible but no later than 2/14/2003.

The following actions are to be completed by the AU Manager or Homeless Coordinator for an EA AU that has SSI income. **The BEACON calculation of financial eligibility using SSI income will not be available until 2/10/2003.**

- Determine if the AU's current income is earned or unearned by clicking on the Results tab, highlighting and selecting the EA AU, clicking on the Financial tab and clicking on Gross Income.
- Go to the Assessed Person Income and Expenses Statement for specific information about the income(s), such as name of employer, source of unearned income, etc.
- Schedule the appointment with the grantee for the assessment as soon as possible. On the Schedule Appointment tab enter the specific verifications the grantee must bring at the time of the assessment, such as, but not limited to, current verification of earnings, child support payments, or RSDI amounts.

Note: Current SSI income can be verified by viewing the SDX (SSI) Inquiry Screen on the FMCS: BA option.

**AU Manager or
Homeless
Coordinator
Responsibilities
for AUs with SSI
Income
(continued)**

-
- When the grantee appears for the interview, advise the grantee that SSI income is now countable and the impact it may have on the family's EA eligibility.
 - Advise the grantee that during **the next 30 days, intensive housing search activities will be conducted with the HAP provider**. The result of the eligibility determination will be known if all of the verifications were provided at the time of the assessment interview. But whether or not the result is known, the 30-day housing search period has started on the date of the assessment interview.
 - Contact the HAP provider to schedule an appointment for the EA AU as soon as possible.
 - Advise the grantee that telephones are available at the TAO or at the HAP provider for calling prospective landlords. Also, transportation to potential rental locations is available through the HAP provider.
 - Review the EA AU's eligibility for the \$1000 relocation benefit if shelter placement has been for at least 60 days, and a TAFDC or EAEDC recipient is present in the EA AU. See State Letter 1248 for the increase in the relocation benefit from \$750 to \$1000 as of 2/3/2003.
 - Update the EA AU's Self-Sufficiency Plan focusing on housing search activities for the next 30 days.
 - Go to the Verification tab and select and verify the information provided by the grantee. Click Print for the VC-1 for the outstanding verifications, allowing for 10 days to provide the verification.
 - Once the income verifications are provided or obtained from the SDX Inquiry Screen, **manually calculate the EA AU's eligibility using the total earned and unearned income of the EA AU. A system calculation will not be available until 2/10/2003**. Ensure the \$148.50 is not being counted as unearned income for an AU that is no longer a TAFDC AU.

Do the calculation manually or use *What If* but the SSI income must be listed as "other income", otherwise the amount will be disregarded in the calculation. Identifying the SSI income as "other income" is **ONLY** for *What If* and until 2/10/2003, when the function will be included in BEACON. The calculation results will show if the EA AU is or is not EA eligible.

EA AUs may be determined ineligible either on the day of the assessment interview or at a later date if additional verification is being provided.

AU Manager or Homeless Coordinator Responsibilities for AUs with SSI Income (continued)

-
- Following the **manual calculation**:
 1. An EA AU whose income does not exceed the EA Eligibility Standard will continue, if otherwise eligible, to receive EA shelter placement. No further action is required at this time
 2. An EA AU whose income exceeds the EA Eligibility Standard or does not meet another EA eligibility requirement is ineligible for EA and the shelter placement will be terminated.

The actual benefit termination date will be a future date that reflects the 30 days from the date of the assessment interview plus 10 days for the advance notice time. Forty (40) days from the assessment interview is the actual termination date.

Example: Interview is on 2/13/2003, counting 40 days from 2/13 is 3/25/03.

Complete the NFL-9 notifying the EA AU that the EA benefits will be terminated. Write in the **actual termination date** (40th day) as the effective date. Give or send the original and one copy of the NFL-9 to the EA AU. File a copy in the AU record. This gives written advance notice to the EA AU that the shelter benefits will be stopped in 40 days.

- **On or after 2/10/2003**, the function of counting SSI income will be operational. At that time, AU Managers or Homeless Coordinators must complete the following BEACON workflows:
 - Household Composition,
 - AU Composition and AU Composition Details,
 - Assessed Person Nonfinancial Statement, and
 - Assessed Person Income and Expenses Statement.

Enter or update the SSI information and indicate countable for EA. Be sure other earned and/or unearned income is entered accurately. On the Other Income Status window ensure the \$148.50 is not being counted as unearned income for an AU that is no longer a TAFDC AU.

The actual benefit termination date will be different from the date on the EBC Results window, **do not authorize the termination action at this time**. The results of EBC will remain listed on the View, *Interview Wrap-up Pending Authorization*.

AU Manager or Homeless Coordinator Responsibilities for AUs with SSI Income (continued)

-
- On day 40, or on a later date if the termination was appealed and the appeal decision upholds the termination:
 - go to the Interview Wrap-up and do EBC again. This will generate a termination date with the next cyclical date;
 - complete the authorization;
 - enter the date of the last night stayed in the shelter or hotel/motel on *SSPS EA Shelter Close* screen; and
 - put a note on the Narrative tab about the EA AU being closed due to income in excess of the EA Eligibility Standard.
 - Contact any other resources in the community that may be able to help provide shelter to the family.

Report

Annotate the *Shelter AUs with SSI Income Countable = Ineligible* report with the action taken. Submit the completed report to the TAO Director/designee who will forward the report to the Regional Director by February 28, 2003.

Any EA AU with Income Exceeding EA Eligibility Standard

Any EA AU with Income Exceeding EA Eligibility Standard

The instructions above describe an EA AU with SSI income but the same instructions for determining the actual benefit termination date apply to any EA AU whose income exceeds the EA Eligibility Standard. **The termination date generated from EBC will be for the next cyclical date but this is not the termination date that is to be used.** AU Managers or Homeless Coordinators are to use the same rules for determining the EA termination date by adding the 30-day grace period to the 10-day advance notice period. The 40th day is used for the termination date on the NFL-9.

Complete the NFL-9 notifying the EA AU that the EA benefits will be terminated. Write in the **actual termination date** (40th day) as the effective date. Give or send the original and one copy of the NFL-9 to the EA AU. File a copy in the AU record. This gives written advanced notice to the EA AU that the shelter benefits will be stopped in 40 days.

The AU Manager or Homeless Coordinator should contact the HAP provider as soon as possible to schedule an appointment for the EA AU. Intensive HAP services are available to this EA AU.

**Any EA AU with
Income
Exceeding EA
Eligibility
Standard**

-
- On the fortieth (40th) day, or on a later date if the termination was appealed and the appeal decision upholds the termination:
 - go to the Interview Wrap-up and do EBC again. This will generate a termination date with the next cyclical date;
 - complete the authorization;
 - enter the date of the last night the EA AU stayed in the shelter or hotel/motel on the *SSPS EA Shelter Close* screen; and
 - put a note on the Narrative tab about the EA AU being closed due to income in excess of the EA Eligibility Standard.
 - Contact any other resources in the community that may be able to help provide shelter to the family.

Relationship to the needy child

Background

The revised EA regulations, effective February 3, 2003, define an **applicant EA AU** as a family with a needy child under the age of 21 and **certain** relatives of the needy child that live with the needy child. The relatives include:

- a parent, stepparent or caretaker relative of the child; and
- the siblings, half-siblings and step-siblings of the needy child.

In extraordinary circumstances, the TAO Director/ designee may approve the inclusion of other relatives of the needy child. This policy applies to EA applicants as of February 3, 2003.

This policy will not be implemented at this time for EA AUs that are active or have a pending EA application dated before 2/3/2003. The active or pending EA AU members meet eligibility criteria by proving relationship to the needy child in accordance with 106 CMR 203.585. The policy must be implemented for all EA AUs applying on or after 2/3/2003.

12-month rule Background

The revised EA regulations, effective February 3, 2003, state an EA AU is not eligible to receive EA benefits more than once in a 12-month period unless one of four conditions apply. See 106 CMR 309.040(A)(3) for the four conditions that allow the EA AU to get shelter benefits before 12 months have expired.

This policy revision requires AU Managers or Homeless Coordinators to review SSPS or BEACON to determine the last date that the AU received EA. An applicant EA AU who received EA is eligible for EA benefits when 12 months have expired since the last EA benefit was received.

Example 1: Application date of 4/1/2003. Prior shelter benefits received from 10/1/2001 until 6/30/2002. There have not been 12 months since 6/30/2002. This applicant would not be eligible for EA benefits until at least 6/30/2003.

Example 2: Application date of 4/8/2003, approved and EA AU is given the NFL-9. The EA AU refuses to go to the shelter placement. The EA shelter benefits will be terminated. This EA AU remains ineligible for shelter benefits until 4/8/2004. The ineligibility information must be entered on the AU Composition Results window, the Narrative tab and SSPS.

To review the applicant's prior EA usage:

- go to the *SSPS - Recipient Inquiry* screen, and
- the BEACON AU Composition Results window and the Narrative tab.

If known to SSPS, "status" is displayed on the screen. If the status is closed, there will be a Close Dt (close date) in the Eligibility Data field on the screen. This is the date used to determine eligibility. If information is not on SSPS, go to the BEACON AU Inquiry and the Narrative tab for prior EA information.

The new 12-month EA policy makes it extremely important that the AU's EA period be closed on SSPS when the family leaves shelter and that the closing date be the last date that the Department paid for shelter for the EA AU. When the shelter benefits for the EA AU are being terminated, the AU Manager or Homeless Coordinator **must** write the last date in shelter, or for an initial refusal to go to a shelter placement, write the EA application date on:

- a copy of the EA-1 from the AU record, or
- a print of the EA-1 Inquiry screen.

The EA-1 or the EA-1 Inquiry screen is given to Data Entry for entry on the new SSPS *EA Shelter Closing* screen. Also be sure to enter the ineligibility information on the AU Composition Results window and the Narrative tab.

**Scheduled SSPS
Report**

Within the next few weeks, a report from SSPS will be sent to each TAO listing the EA AUs that have open EA authorization periods but have been reported by the shelter as having left shelter for permanent housing. Instructions on closing the authorization period will be issued at that time.

Questions

If you have any questions, please have your Hotline designee call the Policy Hotline at 617- 348-8478.
