



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

Argeo Paul Cellucci
Governor

Jane Swift
Lieutenant Governor

William D. O'Leary
Secretary

Claire McIntire
Commissioner

Field Operations Memo 99-12
June 15, 1999

To: Transitional Assistance Office Staff

From: Joyce Sampson, Assistant Commissioner for Field Operations

Re: Food Stamp Waiver for Earned Income Cases

Introduction

USDA approved a Food Stamp Program waiver allowing workers to conduct an annual face-to-face recertification interview with certain Category 9 working assistance units (AUs) while allowing intervening recertifications to be performed by mail.

The Food Stamp Program waiver will benefit both the recipient and the worker in the following ways:

- **For the recipient**, reducing the number of face-to-face contacts makes it easier for working food stamp AUs to recertify and to maintain food stamp eligibility. Recertification by mail prevents the recipient from missing work to accommodate the face-to-face recertification process while recognizing work as a priority for food stamp AUs.
 - **For the worker**, reducing the number of face-to-face contacts allows more time to examine reported wages and other reported changes. This process reduces Transitional Assistance Office (TAO) traffic and eliminates the need for rescheduling missed appointments. Recertification by mail allows workers to focus their attention on eligibility factors and error-prone areas.
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**Food Stamp
Program Waiver**

The Food Stamp Program waiver allows the Department to conduct one face-to-face recertification interview and three mail-in recertifications per year for all Category 9 working cases except for the following:

- Any case with a household member (grantee or dependent) subject to the FS/Work Program (AR 05, 06, 07 or 08).
- Any case subject to TAFDC monthly reporting with a corresponding Category 9 case **and** both the Category 2 and Category 9 cases have the same Worker.
- Any extension case (program code 4 or 9).
- Any case with self-employment income (Type S1 or S2) or rental income (Type RT) on PACES GRT2 Screen.

To identify the appropriate Category 9 cases, the System selected AUs with an entry in the Earned INC Block on the RECD Screen and excluded the above groups.

**Food Stamp
Benefits
Recertification
for Households
with Earnings**

The *Food Stamp Benefits Recertification for Households with Earnings* (FSP-RCF) form has been developed to capture pertinent information from recipients. After being initially introduced to the form, recipients will complete it on their own three times per year.

**Implementing
the Food Stamp
Program Waiver
Process**

Ongoing Recipients Subject to the Food Stamp Program Waiver

Ongoing recipients subject to the Food Stamp Program waiver will be introduced to the process at their next face-to-face recertification interview. These recipients with expiring certification periods will be identified on a report titled *Category 9 Food Stamp Earned Income Cases*. This report will be sent to TAOs at the beginning of each month until all cases subject to the Food Stamp Program waiver process have had a face-to-face recertification interview. Workers will receive the first report during the week of 6/28/99.

**Implementing
the Food Stamp
Program Waiver
Process
(continued)**

When recipients listed on the *Category 9 Food Stamp Earned Income Cases* report come in to recertify, the worker must:

- explain to the recipient that he or she is part of the Food Stamp Program waiver process which means:
 - for the next three recertifications the recipient will receive the new *Food Stamp Benefits Recertification for Households with Earnings* (FSP-RCF) form in the mail. The recipient will receive the FSP-RCF to fill out and return by a specified date.
 - a special notice card will be enclosed in the mailing which specifies the date the FSP-RCF must be returned to the worker to avoid loss or interruption of benefits.

Note: Recipients will receive the FSP-RCF and the special notice card approximately 45 days before their end date of certification in accordance with the Case Processing Schedule. See *Systems User's Guide*, Volume 1, Appendix E.

- once a year the recipient will receive a recertification notice to report to the TAO for a face-to-face recertification interview.
- help the recipient fill out the first FSP-RCF and make certain that the recipient understands all the questions and Department terminology on the form.

Note: This form will be used instead of the *Application for Food Stamp Benefits* (FSP-1) for this introductory face-to-face interview to ensure the recipient can complete the form on his or her own. After this introduction to the new form, all subsequent face-to-face interviews will use the standard FSP-1.

- enter, in Block 37 of the PID, the beginning certification date from this face-to-face recertification interview.

This date will alert the system that the introductory recertification has been completed and that the FSP-RCF should be sent to the recipient for the next three recertification. This date will also be used to trigger the yearly face-to-face recertification interview. **Workers must only update this block when a face-to-face interview is done with the recipient.**

**Implementing
the Food Stamp
Program Waiver
Process
(continued)**

For example, an ongoing recipient with an SSN ending in 6 comes into the office on 7/24/99 for a face-to-face interview. The new certification period would be 8/10/99 to 11/9/99. The worker would enter the beginning certification date of 8/10/99 in Block 37 of the PID.

Note: When workers enter the beginning certification date in Block 37, they must enter a Type E change in Block 30 and update the language code in Block 34 of the PID.

- enter a three-month certification period in Blocks 57 and 58 of the PID. See *Systems User's Guide*, Volume 1, Appendix E, Case Processing Schedule.

Note: To minimize errors caused by fluctuations in income, these AUs are subject to three-month certification periods.

- enter the recipient's earnings on a PACES Worksheet (refer to page 7 of this memo for instructions on anticipated income).

New Applicants Subject to the Food Stamp Program Waiver

At application, workers must check to see if an eligible applicant is subject to the Food Stamp Program waiver process.

If no, proceed with the application interview as usual.

If yes, the worker must:

- complete the *Application for Food Stamp Benefits (FSP-1)* with the applicant.
 - explain to the applicant that he or she is part of the Food Stamp Program waiver process which means:
 - he or she will be receiving the FSP-RCF by mail three times per year to fill out and return by a specified date.
 - a special notice card will be enclosed in the mailing which specifies the date the FSP-RCF must be returned to avoid loss or interruption of benefits.
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**Implementing
the Food Stamp
Program Waiver
Process
(continued)**

Note: The individual will receive the FSP-RCF and the special notice card approximately 45 days before his or her end date of certification in accordance with the Case Processing Schedule. See *Systems User's Guide*, Volume 1, Appendix E.

- once a year the individual will receive a recertification notice to report to the TAO for a face-to-face recertification interview.
- review the FSP-RCF with the applicant and make certain that the applicant understands all the questions and Department terminology on the form.
- enter, in Block 37 of the PID, the beginning certification date from this application interview.
- enter a three-month certification period in Blocks 57 and 58 of the PID. See *Systems User's Guide*, Volume 1, Appendix E, Case Processing Schedule.
- enter the applicant's earnings on a PACES Worksheet (refer to page 7 of this memo for instructions on anticipated income).

**Yearly
Face-to-Face
Recertification
Interview**

A face-to-face recertification interview must be conducted once in a 12-month period. Once a year, PACES will send the regular recertification notice, instructing the recipient to report to the TAO. At each yearly face-to-face recertification interview the worker must complete the *Application for Food Stamp Benefits* (FSP-1) with the recipient.

To track the yearly recertification date, workers must enter the beginning certification date in Block 37 of the PID whenever a face-to-face recertification interview is conducted.

Note: When workers enter the beginning certification date in Block 37, they must make an entry in Block 30 and update the language code in Block 34 of the PID.

When the FSP-RCF Is Returned Timely

When a FSP-RCF is mailed to the recipient and he or she returns it timely with all verifications, the worker must:

- enter a three-month certification period in Blocks 57 and 58 of the PID. See *Systems User's Guide*, Volume 1, Appendix E, Case Processing Schedule; and
- enter the recipient's earnings on a PACES Worksheet (refer to page 7 of this memo for instructions on anticipated income).

When a FSP-RCF Is Returned Late

When a FSP-RCF is mailed to the recipient and he or she returns it late, the worker must check the status of the timely case closing. See *Systems User's Guide*, Volume 1, Appendix E, Case Processing Schedule.

- ▶ If the case is still open, follow the previous instructions for When a FSP-RCF is Returned Timely.
- ▶ If the case has already closed, the recipient must come into the office for a face-to-face interview to reopen the case.

Note: When reopening a closed case, the worker must complete the FSP-1 with the recipient.

Timely Case Closings

The case will automatically close if a recipient fails to:

- return a FSP-RCF; or
- appear for the yearly face-to-face recertification interview; or
- provide required verifications.

In these instances the recipient must come in for a face-to-face appointment to reopen the case.

Reminder: The worker must complete the FSP-1 with the recipient and enter the beginning certification date in Block 37 of the PID, to track the yearly recertification date.

**Anticipated
Income**

To determine an AU's eligibility and benefit level, the worker must count any anticipated income the AU and the worker are **reasonably certain** will be received during the remainder of the certification period.

If the amount of income to be received is uncertain, do not use it to indicate anticipated income. The worker must inform AUs that when they become reasonably certain of the income they must report it within 10 days. See 106 CMR 366.110: Household Responsibilities.

*For example, an AU anticipating income from a new source, such as a new job or public assistance benefits, may be uncertain as to the amount and when it will be received. This income should **not** be treated as countable income unless there is reasonable certainty of the amount of the payment and the date of its receipt.*

Recipients must send in their previous six weeks of pay stubs from the date they mail the FSP-RCF. This income will be used to indicate future income. **If a recipient has income that is not a regular occurrence, do not use it.**

Reminder: Workers should check the dates on pay stubs to ensure recipients submit consecutive weeks.

For example, an AU submits six consecutive weeks of pay stubs: \$200, \$175, \$25, \$200, \$175, \$200; when the worker calls and asks the recipient why one week was \$25, the recipient says she was out sick for most of the week. This is not a regular occurrence for the recipient to be out sick, so the worker would note this in the case record and would not count this pay stub.

The worker would:

- *add the five weeks of pay;*
(\$200 + \$175 + \$200 + \$175 + \$200 = \$950)
 - *divide the total by 5;*
(\$950 / 5 = \$190)
 - *multiply the remainder by 4.333;*
(\$190 x 4.333 = \$823.27)
 - *enter 823.27 in the FIW2 Section of the PACES Worksheet Block 20, entry 1; and*
 - *enter an X in the 4 1/3 Block.*
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**If a Case
Becomes a
Food Stamp
Program Waiver
Case**

If a recipient who is not currently subject to the Food Stamp Program waiver process reports earnings at recertification, the worker must:

- enter the recipient's earnings on a PACES Worksheet (refer to page 7 for instructions on anticipated income).
- enter a three-month certification period in Blocks 57 and 58 of the PID. See *Systems User's Guide*, Volume 1, Appendix E, Case Processing Schedule.
- enter, in Block 37 of the PID, the beginning certification date (this is the same date entered in Block 57 of the PID).

Note: When workers enter the review date, they must enter a Type E change in Block 30 and update the language code in Block 34 of the PID.

If a recipient who is not currently subject to the Food Stamp Program waiver process reports earnings during a certification period, the worker must:

- enter the recipient's earnings on a PACES Worksheet (refer to page 7 for instructions on anticipated income).
- shorten the certification period in Block 58 of the PID, if necessary, to two or three months to ensure a notice is generated for the recipient to report to the office for a face-to-face recertification.

Note: If entering the transaction after the select date for recertification, according to the last digit of the case SSN, enter a three month certification to ensure the recipient will receive the proper notice. See *Systems User's Guide*, Volume 1, Appendix E, Selecting Cases for Recertifications to verify select dates.

For example, if a recipient whose SSN ends in a 9 reports earnings on July 6, 1999 and his certification period is scheduled to end 12/13/99, the worker would change his end certification date to 9/13/99 in Block 58 of the PID. The certification period is shortened to two months because the transaction was entered before the 28th of the month (select date). This allows sufficient time for the recipient to receive the proper recertification notice.

**Terminated
Earned Income
Case**

If a case subject to the Food Stamp Program waiver process stops working and does not have any other earned income, the worker must:

- zero out the income on file using a PACES Worksheet.
- enter a one- or two-month certification period in Blocks 57 and 58 of the PID. See Field Operations Memo 96-40, Guidelines for Establishing Certification Periods.

**Critical
Information**

The information captured on the FSP-RCF is critical to ensure case accuracy and the correct food stamp benefit amount. If recipients experience difficulty completing certain areas of the form, workers must take note of the problem areas and have their hotline designee contact the policy hotline with suggested revisions to the form.

Questions

If you have any policy questions, have your designee call the Policy Hotline at (617) 348-8478. Systems questions should be directed to the Systems Customer Service Center at (617) 348-5290.
