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Field Operations Memo 2006-33
August 24, 2006

To: Transitional Assistance Office Staff
From:  Cescia Derderian, Assistant Commissioner for Field Operations
Re: Food Stamp Program Access Review

Overview

The Department of Transitional Assistance and the USDA Food and Nutrition Service (FNS) are strongly committed to providing eligible low-income households with nutrition assistance through the Food Stamp Program. Department staff have increased participation in the Food Stamp Program while maintaining timeliness in case processing and also decreasing the error rate – a very remarkable achievement. The following are some of DTA's accomplishments:

- the Food Stamp participation rate in Massachusetts increased nearly 80% since 2002, reaching over 430,000 people statewide;
- DTA received an award from USDA for timely case processing; and
- DTA received a USDA bonus award for having the 8th lowest Food Stamp error rate in the country and the lowest in the Northeast Region.

**USDA
Program
Access
Review**

In November 2005, USDA Food and Nutrition Service conducted an annual Program Access Review at four TAOs. The review included:

- an analysis of 341 new, closed and denied PA and NPA Food Stamp AUs (including Internet applications) for the sample months of June, July and August 2005;
 - interviews with a number of TAO staff members and Food Stamp applicants/recipients; and
 - observations of daily operations in the TAO's reception/waiting areas.
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**USDA
Program
Access
Review
(continued)**

In a letter accompanying its report to the Department in February 2006, USDA acknowledged Massachusetts' "innovative efforts to implement an online application process," and "the successful steps ...already taken" to increase Food Stamp Program participation. The letter also commented that, overall, applicants/recipients interviewed by USDA in TAO waiting areas "responded favorably regarding the service they received."

**Purpose of
Memo**

While recognizing the Department's successes in increasing participation in the Food Stamp Program and maintaining timely processing, USDA also cited areas where the Department must strengthen procedures to comply with federal requirements. The purpose of this memo is to describe USDA's findings along with steps taken to address them. This memo will discuss the following:

- providing expedited service for Internet applications, when appropriate;
 - scheduling applicant interviews;
 - sending a notice of missed interview when an applicant has not appeared for an interview;
 - denying applicants for failure to provide verifications when the applicant was not given notice of required verifications; and
 - requiring an applicant to file a second application within 60 days of the original application.
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**Internet
Applications
Must Be
Evaluated for
Expedited
Service**

The USDA reviewers found that some Internet applications are not screened for expedited service nor are some applicants provided with the opportunity to participate in the Food Stamp Program within seven days of filing the application.

Recognizing that processing Internet applications represents a new way of doing business, Field Operations Memo 2006-30, issued to TAO staff on July 10, 2006, established standard time frames and guidelines for processing Food Stamp applications, including Internet applications. All applicants must be screened by DTA for expedited services at the time of first contact, regardless of the method of application.

If the date of first contact occurs after Day 7, the applicant may still be eligible for expedited services under **subsequent discovery** rules. See page 5 of Field Operations Memo 2006-30 for procedures for issuing expedited Food Stamp benefits under subsequent discovery rules.

**An Interview
Must Be
Scheduled for
Each Applicant**

The USDA reviewers found that TAO staff did not schedule interviews for all applicant households.

As part of the Department's commitment to removing access barriers and increasing Food Stamp Program (FSP) participation, DTA has allowed applications to be received by a variety of non-traditional methods: mail, fax, drop-off or Internet. In addition, the Department's policy of waiving the face-to-face interview in hardship situations has resulted in requests for phone interviews by those applicants using non-traditional application methods.

Field Operations Memo 2006-30 established standard time frames and guidelines for processing all FS applications, walk-in, mail-in, fax, drop-off and Internet applications. Procedures are now in place for contacting non-traditional applicants by phone, with mail follow-up if unable to contact, so that each applicant can be screened for expedited service and hardship waiver purposes, as well as scheduled for an application interview.

TAO staff are reminded that all applicants must be screened by DTA for expedited service at the time of first contact (see Field Operations Memo 2006-30). If the AU Manager is unable to speak with and screen the applicant on Day 1, the AU Manager must on Day 2:

- mail a Food Stamp Application Appointment Letter for an In-Office Interview (see F.O. Memo 2006-30, Attachment A) if the applicant did not indicate a hardship waiver reason on the FS application; or
- mail a Food Stamp Application Appointment Letter for a Telephone Interview (see F.O. Memo 2006-30, Attachment B), if the applicant indicated a hardship waiver reason on the FS application.

*If the applicant or assisting person does not respond to DTA phone and mail contact by Day 7, the AU will be treated as a non-expedited application, except for situations when **subsequent discovery** rules apply.* In addition, TAO staff are reminded that an application interview, either by phone or face-to-face, must be scheduled for each applicant household by:

- Day 7 for applicants who qualify for expedited service; or
- Day 14 for applicants who do not qualify for expedited service.

The Department is in the process of modifying both the paper and Internet FS applications to request a second phone number from the applicant. Applicants will also be able to indicate a hardship and record the best day/time for DTA to contact them.

Notice of Missed Interview Must Be Sent

The USDA reviewers found that TAO staff did not send a notice of missed interview in all cases when an applicant did not appear for a scheduled interview.

For many years the Department has been exempted by a waiver from USDA from the requirement of sending a Notice of Missed Interview (NOMI). This waiver has expired, however, and federal regulations require that a Notice of Missed Interview (NOMI) be sent to an applicant who fails to appear for a scheduled interview. If the notice is not sent and the AU is subsequently denied, this is considered a negative error for Quality Control purposes. The Department is working with MIS to provide an automated solution to this issue. It is anticipated that a BEACON-generated Notice of Missed Interview letter will be in production by the end of the year.

Incorrect Denial for Failure to Provide Verifications; Notice of Required Verifications

The USDA reviewers found that, in some of the sample cases, TAO staff denied applicants for failure to provide verifications and did not provide applicants with a notice of required verifications.

The Department has been reviewing policies and procedures regarding verification requirements. In recent months, DTA has issued several reminders to staff in “From the Hotline” and in FYIs in *Transitions* on various verification issues. In addition, posters notifying applicants of DTA’s obligation to help gather verifications are displayed in every TAO.

The Department is in the process of making significant changes to the Verification Checklist (VC-1) to make the form clear, concise and user-friendly. AU Managers are reminded that **anytime verifications are requested, the applicant or recipient must receive a Verification Checklist**. The BEACON-generated VC-1 is maintained in Document History as a permanent record of requested verifications.

Note: Future BEACON enhancements will **require** the use of an updated BEACON-generated VC-1, and **all** verifications received will need to be entered on the Verifications tab, even if the AU is ultimately denied for failure to provide verifications. These enhancements will ensure the accuracy of the case record in BEACON and will lay the foundation for future automated notice functionality. In anticipation of these changes, AU Managers and Supervisors are strongly advised to use the BEACON-generated VC-1, and to promptly enter all verifications received into the Verifications tab.

**Second
Application
within 60 Days
Not Needed**

The USDA reviewers found cases where applicants were required to file more than one application when they returned within 60 days of the original application.

Field Operations Memo 2006-20 established procedures for processing denied or closed Food Stamp AUs. TAO staff have been instructed to process the original application if an applicant *denied for failure to submit required verifications* provides missing proofs on or before Day 60. In addition, a new paragraph has been added to the *failure to submit required verifications denial notice*, explaining that the applicant has the right to submit missing verification on or before Day 60 without completing a new application.

**RR/FSP-1B (Blue
or Yellow Form)**

USDA recommended that the Department discontinue the use of the RR/FSP-1B form - the “blue form” (or the “yellow form” for the Spanish version) - and develop a process for combining signatures. Changes to both the paper and BEACON Food Stamp application are being made that will eliminate the need for the blue form in all instances except for Internet and SSA applications.

Questions

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