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

> MARYLOU SUDDERS Secretary

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Online Guide Transmittal 2020-55 August 6, 2020

To:

Re:

From:

Sarah, Stuart, Associate Commissioner for Change Management

SNAP: SNAP Application and Recertification Interview Waiver

Overview The Food and Nutrition Service (FNS) has extended the waived requirement to conduct SNAP application and recertification interviews when all mandatory verifications are satisfied. This waiver is applicable to all applications and recertifications being processed until further notice. Additional guidance will be issued when interviews are no longer waived.

Department of Transitional Assistance Staff

Purpose The purpose of this Transmittal is to advise staff that eligible SNAP application and recertification interviews will be waived until further notice, and that temporary procedural modifications have been placed on the expedited issuance process. With the issuance of this Transmittal, OLGT 2020-51 SNAP: Resumption of Application and Recertification Interviews is obsoleted.

Waived SNAP Application Interview

Current Pending SNAP Applications Applicat Applications with All Mandatory Verifications If an application is received and all questions related to mandatory verifications have affirmative answers, for example, income or U.S. citizenship status, where staff are able to verify all mandatory verification elements by accessing external databases and information provided by the applicant, then the SNAP Application Interview must be waived. The application must be processed using the available information.

Remember: Wages must be verified. If the Work Number does not have the wage information for the client's job, staff must send a mandatory VC-1 for earnings and encourage the client to obtain and submit documentary evidence such as wage stubs, screen shots, or a printout/letter from the employer. If a client cannot verify wages using documentary evidence, we will accept the best available information including a written self-declaration. Temporary COVID-19 procedures are still in place for all other verification factors, including terminated income.

If all mandatory verifications are available, SNAP applications must be processed for regular, ongoing benefits. Staff must answer "No" to all expedited screening questions for these cases but make every effort to issue ongoing benefits within 7 days to satisfy expedited timelines.

If there are outstanding optional verifications, 3 cold call attempts must be made to obtain verbal self-declarations. If unsuccessful in reaching the applicant, issue a Verification Checklist (VC-1). If a VC-1 is sent, process the application immediately without giving credit for the outstanding optional expenses.

Exception: If processing the application without giving credit for expenses results in denial, case managers must wait to process the application until the client provides verifications or Day 30, whichever occurs first.

Applications
with Outstanding
Mandatory
VerificationsInterviews cannot be waived unless/until the mandatory verifications are
satisfied. This may include situations where information related to mandatory
elements must be clarified.VerificationsVerifications

If there is missing information but the applicant was previously known to BEACON and the missing information can be reasonably ascertained, contact is not required.

If an applicant was recently known to have different circumstances, for example, additional household members or sources of income, but only indicated a household of one, or reported that there was no source of income on the new application, process the application using the new information reported on the application, as long as there are no other outstanding elements. Applications When an application is received that has outstanding mandatory elements, 3 with Outstanding cold call attempts must be made to reach the applicant. If they are Mandatory unsuccessful, the client has HLS or does not have a phone number on file, Verifications issue a VC-1 that specifically identifies what is outstanding. Follow the (Continued) procedures outlined in the Online Guide page SNAP Simplified Reporting -Interim Report under the Establishing Contact at IR When Information is Incomplete, Questionable, or Contradictory section in conjunction with verification procedures. References to "Interim Reports" in the Online Guide page must be substituted for "SNAP Application."

> A SNAP Application Interview must be scheduled when a VC-1 for mandatory verifications is issued.

Staff must use the free-form text boxes on the VC-1 and Appointment Scheduler with the following:

"You are receiving a Verification Checklist and an Application Interview Appointment. We have modified procedures due to COVID-19. If you provide the verifications we are requesting, we will not need to interview you."

If the client provides the mandatory verifications, an interview is no longer needed. In that instance, cancel the scheduled interview and process the SNAP application.

If an interview is missed, BEACON will automatically generate a Notice of Missed Interview (NOMI). If mandatory verifications are not provided, BEACON will automatically deny the application for failure to provide which will allow for a reinstatement should the client satisfy the requirements within the allowable timeframes.

Exception: SNAP Applications that come from MassHealth (indexed as SNAP Application - MH Senior Applications) must be treated as having missing mandatory elements because they only collect basic demographic information for the head of household.

Waived Recertification Interview

SNAP Recertifications

Current Pending Effective with the issuance of this Transmittal, all SNAP recertifications where interviews were required and the Interview Held radio button in the Interview Window is either blank, or No with a reason of Interview Missed and do not have an outstanding VC-1, will be placed under the action type: SNAP Recertifications with No Interview Held. Staff must review these SNAP recertifications using the procedures below.

Recertifications with All Mandatory Verifications If a recertification is received that normally requires an interview and all questions related to mandatory verifications have affirmative answers, and staff are able to verify all mandatory verification elements by accessing external databases and information provided by the applicant, then the Recertification Interview must be waived. The recertification must be processed using the available information.

Remember:

- Households where all adult members are elderly and/or federally certified as disabled and have no earned income are still waived from the interview process regardless of whether the client is missing information. Only cold call or VC-1 for the missing information. No appointment is to be scheduled.
- Wages must be verified. If the Work Number does not have the wage information for the client's job, send a mandatory VC-1 for earnings and encourage the client to obtain and submit documentary evidence such as wage stubs, screen shots, or a printout/letter from the employer. If a client cannot verify wages using documentary evidence, we will accept the best available information including a written self-declaration.
- Temporary COVID-19 procedures are still in place for all other verification factors, including terminated income.

Because the Recertification form does not include questions related to income, staff must carefully review a recertifying client's case record to determine if they had income on file. Sections on the form that the client left blank are to be accepted by staff as a self-declaration that the eligibility factor has not changed. Clients are instructed on the Recertification form to send verification of new income sources that are not available through data matches or sources.

Staff must continue to check available data sources when completing the Recertification process.

If there are outstanding optional verifications, make 3 cold call attempts to obtain verbal self-declarations, if unsuccessful, issue a VC-1 and process the recertification immediately without giving credit for the outstanding optional expenses.

Exception: If processing the recertification without giving credit for expenses results in the case being closed, wait to process the recertification until the client provides verifications or the closing date (last days of the client's cyclical month), whichever occurs first.

Recertifications Interviews cannot be waived unless/until the mandatory verifications are with Outstanding satisfied. This may include situations where information related to mandatory Mandatory verifications elements must be clarified.

If there is missing information but that information can be reasonably ascertained by the case manager, contact is not required.

If a client was recently known to have different circumstances, for example, additional household members or sources of income, but on the recertification only indicated a household of one or reported that there was no source of income, process the recertification using the information reported, as long as there are no other outstanding elements.

When a recertification is received with outstanding mandatory elements, make 3 cold call attempts to reach the client. If the attempts are unsuccessful, the client has HLS or does not have a phone number on file, issue a VC-1 that specifically identifies what is outstanding. Follow the procedures outlined in the Online Guide page SNAP Simplified Reporting – Interim Report under the Establishing Contact at IR When Information is Incomplete, Questionable, or Contradictory in conjunction with verification procedures.

A SNAP Interview must be scheduled when a VC-1 for mandatory verifications is issued.

Staff must use the free-form text boxes on the VC-1 **and** Appointment Scheduler with the following:

"You are receiving a Verification Checklist and a Recertification Interview Appointment. We have modified procedures due to COVID-19. If you provide the verifications we are requesting, we will not need to interview you."

If the client provides the mandatory verifications, an interview is no longer needed. In that instance, cancel the scheduled interview and process the recertification.

If an interview is missed, BEACON will automatically generate a *Notice of Missed Interview* (NOMI). If mandatory verifications are not provided, BEACON will automatically close the case failure to provide which will allow for a reinstatement should the client satisfy the requirements within the allowable timeframes.

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Applications and
Recertifications
with a Work
Number MatchWhen an applicant or client who is recertifying reports that they are newly
employed or have a change in employment hours, and the wages are
unverified, first explore if the required wage information is available on the
Work Number.

If a client reports no earned income at either Application or Recertification, and the client has a PI Match for Active Work Number in the system, the case manager <u>must</u> attempt 3 cold calls to the client for clarification of wages.

If the case manager contacts the client, and:

- the Work Number includes the required wage information, inform the client of the listed gross amounts and frequency and update the wages in BEACON.
- the client disputes the information from the Work Number, send a mandatory VC-1. Data from the Work Number must not be used once a client disputes the information.

If the case manager cannot make contact with the client:

- schedule a SNAP interview and issue a mandatory VC-1, as there is conflicting information, and the client must provide clarification of the income.
- on the VC-1, in the free-form text boxes **and** Appointment Scheduler, include the following information:

"You are receiving a Verification Checklist and an Interview Appointment. We have modified procedures due to COVID-19. If you provide the verifications we are requesting, we will not need to interview you."

Coding Interviews in BEACON

BEACON has reinstated the SNAP interview waived option COVID-19: Interview Waived. This option must always be selected, even if an interview may be required.

If the client is required to have an interview because mandatory verifications are outstanding, an interview must be scheduled. If the interview is missed, BEACON will automatically issue a NOMI; staff intervention is not required.

Coding Interviews in BEACON (Continued)	If the client was required to have an interview because mandatory verifications were outstanding, but the client subsequently provided those verifications before the interview appointment, you must cancel the scheduled interview.
	Staff must write a Narrative to reflect the waiver of the interview due to COVID-19 along with any other pertinent information about the case. There will not be automatic scheduling of interviews for applications without an interview.
Questions	If you have any policy or procedural questions, after conferring with the appropriate TAO personnel, please have your Systems Information Specialists or TAO management email the DTA Mailbox. Systems issues should be directed to the Systems Support Help Desk.