

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

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Online Guide Transmittal 2020-60 August 28, 2020

To:

Department of Transitional Assistance Staff

From:

Sarah Stuart, Associate Commissioner for Change Management

Re:

SNAP: Temporary COVID-19 Recertification Modifications and IR Updates

Overview

Last spring, in response to COVID-19 and the Families First Coronavirus Response Act, the Department extended certification periods to facilitate the timely issuance of benefits. With Recertifications and Interim Reports (IRs) now coming due, however, the Department anticipates that the previous extensions will double the volume of Recertifications for October, November, and December.

To provide relief to both staff and clients during this difficult time, the Food and Nutrition Service (FNS) approved a waiver allowing the Department to temporarily modify the procedures for SNAP Recertifications with certification end dates from September 30, 2020 through December 13, 2020 as follows:

- **Group 1 COVID-19 Recertification**: For recertifying households whose certification periods were previously extended by 6 months back in March, April, and May, the Department will replace the current SNAP Recertification form with the simplified COVID-19 Recertification form and streamline the interview process.
- Group 2 Using the IR for Recertification: For recertifying households whose certification periods were **not** extended by 6 months back in March, April, and May, the Department will use the current IR form and procedures to complete the recertification process.

Overview (continued)

In addition to these modifications, the Department will automatically process COVID-19 Recertifications and IRs if they meet the criteria for automated processing via DTA Connect or Optical Character Recognition (OCR) technology.

With these measures, the Department aims to alleviate the heavy workload for staff while preventing benefit issuance delays.

Purpose

The purpose of this Online Guide Transmittal is to advise staff of:

- the COVID-19 Recertification form;
- the IR form used for certain Recertifications;
- the OCR technology for Recertifications and IRs; and
- associated procedural and system modifications.

Group 1: COVID-19 Recertification

BEACON will automatically mail the new COVID-19 Recertification form to all households that:

Criteria

- have certification periods that were extended by 6 months (as detailed in Online Guide Transmittal 2020-37);
- have certification end dates from September 30, 2020 through December 13, 2020; and
- are neither Bay State CAP nor PA combo cases.

DTA Connect

Clients meeting these three criteria will also be able to submit the COVID-19 Recertification form online through DTAConnect.com, which will be updated to include a COVID-19 Recertification section.

Format of Form

The COVID-19 Recertification form has the same format as the SNAP IR, except for minor changes in verbiage (to reflect Recertification policy). The Department will send the Voter Preference Form (as mandated by the NVRA) at the same time, but in a separate envelope to prevent the form from being erroneously returned.

Interview

COVID-19 Recertification households must complete an interview, with the exception of households that meet the waived interview criteria for elderly/disabled households (i.e., all adult household members are elderly or federally certified as disabled and have no earned income).

Pop-up Reminder

Upon entering a COVID-19 Recertification case, BEACON will generate a pop-up indicating that the case is subject to the COVID-19 Recertification processing rules. Once the case manager initiates the recertification, BEACON will enable a simplified workflow.

Group 1: COVID- 19 Recertification (continued)

When reviewing a COVID-19 Recertification case that requires an interview, the case manager must cold call the household three times. If all the attempts are unsuccessful, the case manager must schedule a telephone interview and mark the Perform cold call checkbox in the BEACON Phone page to indicate that s/he attempted the cold calls.

Streamlined Workflow & Interview

If a cold call is successful or the client keeps their scheduled appointment, the case manager must use the simplified workflow to complete a streamlined interview. To promote efficiency and the timely processing of cases, this workflow reduces the number of pages that BEACON requires case managers to visit while interviewing the client. The COVID-19 Recertification workflow will require visitation to the following pages:

- Voter Registration
- Household
- Earned Income
- Other Income Status
- Shelter Expenses
- Standard Utility Allowance
- Dependent Care Expenses (only if record exists)
- Support Expenses (only if record exists)
- Medical Expenses (only if record exists)
- Disability
- Interview
- Address
- Phone

Important: If an interview is held, the case manager must complete the ADA Accommodation/Special Assistance Request page.

In addition to asking questions based on the pages that appear in this simplified workflow, case managers must also ask the following questions (which will not appear in the workflow):

 Have you or any household members ever been convicted of public assistance fraud, trading SNAP benefits for drugs, trading SNAP benefits for weapons/ammunition, and/or trading SNAP benefits for at least \$500?

Note: If the client answers yes, the case manager must complete the applicable page(s) under the Eligibility Limitations workflow.

Has the INS status of any noncitizen household member changed?

Group 1: COVID- 19 Recertification (continued)

Note: Only ask this question if the household is known to include a noncitizen member.

When completing the COVID-19 Recertification, case managers can still access the BEACON pages that are not part of the COVID-19 Recertification workflow. If a recertifying household reports information that requires the case manager to review or update a page not included in this workflow, the case manager must review and update it accordingly.

Verification Procedures

Case managers must verify earned income for COVID-19 Recertifications. The COVID-19 Recertification form directs households to verify earned income for the last four weeks by submitting documentary evidence such as pay stubs or, if self-employed, a completed tax form. Additionally, staff must explore whether the wage information is available in the Work Number and apply the Work Number procedures as per Online Guide Transmittal 2020-48.

Until further notice, the Department will continue applying the temporary COVID-19 verification procedures for all other verification items.

Group 2: Using the IR for Recertification

BEACON will automatically mail the IR form to all households that:

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 have certification end dates from September 30, 2020 through December 13, 2020

Criteria

- have certification periods that were **not** extended by 6 months (as detailed in Online Guide Transmittal 2020-37); **and**
- are neither Bay State CAP nor PA combo cases.

Voter Registration To remain in compliance with the NVRA, the Department will send the appropriate voter registration documents at the same time, but in a separate envelope to prevent the form from being erroneously returned.

DTA Connect

Clients meeting these three criteria who recertify through DTAConnect.com will use the existing webpages for online IRs.

Pop-up Reminder Upon entering an IR for Recertification case, BEACON will generate a popup indicating that the case is eligible to be recertified using the IR processing rules.

Case Processing

Whenever a household uses an IR form for recertification, BEACON will display the regular IR workflow. The case manager must follow the regular IR procedures. Once the case manager processes the IR in lieu of Recertification, BEACON will automatically process the case as a completed SNAP Recertification and establish a new certification period.

Group 2: Using the IR for Recertification (continued)

For the purposes of these temporary procedures, the Department will not generate the Interim Report Warning and Closing Notices for IRs in lieu of Recertification. BEACON will only send these notices to households with true IRs, i.e., who are actually approaching the midpoint of their certification period.

Notices

For true IRs, the Department will continue mailing the IR form following previously established IR timelines.

Automated Processing

COVID-19

Recertifications

BEACON will automatically process a COVID-19 Recertification if:

- the household is waived from the interview requirement because all adults are elderly or federally certified as disabled, <u>and</u> there is no earned income recorded in BEACON;
- the client signs the appropriate section of the first page;
- the client only submits the first page and checks "I did not report any changes and left this form blank," or the client submits all pages and marks each "No" checkbox on the Your Household Information page and leaves no other markings on the form;
- there are no available documents in the Scanned Document History page; and
- there are no outstanding items on the Program Integrity checklist.

True IRs and IRs Used as Recertification

BEACON will automatically process a true IR or an IR in lieu of a Recertification if:

- the client signs the appropriate section of the first page;
- the client only submits the first page and checks "I did not report any changes and left this form blank," or the client submits all pages and marks each "No" checkbox on the Your Household Information page and leaves no other markings on the form;
- there are no available documents in the Scanned Document History page; and
- there are no outstanding items on the Program Integrity checklist.

Automated Processing (continued)

BEACON will not automatically process a COVID-19 Recertification or IR uploaded through the DTA Connect via photograph. To be eligible for automated processing, the forms must be submitted through the DTA Connect web portal or Document Processing Center.

Whenever BEACON automatically processes a COVID-19 Recertification or IR, a batch narrative will state that the form was processed with no changes.

Actions if Not Automatically Processed

When the Department receives a COVID-19 Recertification form or an IR and the form is not automatically processed, BEACON will create the appropriate Action for the case manager to process the Recertification or IR. (BEACON will create the existing Action to process an IR whether the case is a true IR or an IR in lieu of Recertification.)

After being assigned to the Action and entering the case, BEACON will generate a pop-up specifying whether the SNAP case falls under the processing rules for IRs, COVID-19 Recertifications, or regular Recertifications. Once the case manager initiates the Recertification, BEACON will generate the appropriate workflow.

The Interview Page

If BEACON automatically processes a COVID-19 Recertification under the new procedures discussed in this Transmittal, the Interview Held radio button in the Interview page will default to "Elderly Disabled with no Earned Income."

However, if the case is ineligible for automated processing and the case manager determines that the client must complete an interview, then:

- the case manager must open the Interview page and select "Yes" for Interview Held (if the client ends up completing the interview); or
- the case manager must open the Interview page, select "No" for Interview Held and select "Missed Interview" for the "No" Reason (if the client is scheduled for an interview but subsequently misses it).

Interview Not Required for EDSAP and IR Staff must remember that an Action to process a COVID-19 Recertification does not necessarily mean that an interview is required.

The case manager must review the case to determine if all adult members of the household are elderly or federally certified as disabled and have no earned income.

The Interview Page (continued)

Additionally, the case manager must determine whether a cold call must be made and/or VC-1 must be sent, or the case can be processed based on the information provided or using information in available databases. (Interviews are not required for true IRs and IRs in lieu of

ADA Requirements

Recertification.)

Staff are reminded that these procedures do not change the ADA accommodation processes. If a client discloses verbally or in writing that they have a disability that may impact their ability to meet Department requirements, staff must attempt to contact the client to explore whether an accommodation is necessary, regardless of whether or not an interview is required. If an interview is held, the case manager must complete the ADA Accommodation/Special Assistance Request page.

If the client already has an ADA accommodation in place, staff must ensure that the accommodation is provided, if applicable, during the certification activities. As always, a detailed narrative must include any updates made to the ADA pages.

Accommodations require a CAC referral only when the client specifically asks to speak with a CAC or the case manager is unable to address the accommodation. Prior to making the referral, the case manager must complete the workflow as much as possible in accordance with established procedures.

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 them to DTA. Procedural Issues.

Systems issues should be directed to the Systems Support Help Desk.