



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

DEVAL L. PATRICK
Governor


JUDYANN BIGBY, M.D.
Secretary

TIMOTHY P. MURRAY
Lieutenant Governor

JULIA E. KEHOE
Commissioner

Field Operations Memo 2008-59
November 12, 2008

To: Transitional Assistance Office Staff

From:  John Augeri, Assistant Commissioner for Field Operations

Re: Supplemental Nutrition Assistance Program (SNAP): Negative Errors and Application Processing

Background and Purpose

Negative errors are errors that occur when the Department denies or closes a case incorrectly. Fortunately, the negative error rate in Massachusetts remains below the national average. However, in recent months the Department has seen a significant rise in the negative error rate. The Department's focus, remains on keeping this error rate as low as possible to ensure that all eligible families have access to Supplemental Nutrition Assistance Program (SNAP) benefits.

The purpose of this memo is to:

- remind case managers and supervisors of the policies and procedures that, when correctly followed, will ensure that no case is inappropriately denied or closed; and
 - introduce the job aid, "SNAP Negative Errors and How to Avoid Them."
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Most Common Negative Errors

The most common negative errors occur for:

1. failing to schedule an interview;
 2. failing to send a Notice of Missed Interview (NOMI);
 3. closing or denying a case for failure to provide an optional verification;
 4. closing or denying a case for failure to provide verifications that are already in the case record;
 5. closing or denying a case for failure to provide a verification that is mandatory for TAFDC or EAEDC but not required for SNAP.
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**Most Common
Negative Errors
(continued)**

6. failing to provide a Verification Checklist (VC-1) to the applicant or client when verifications are required;
 7. failing to allow the applicant or client sufficient time to provide verifications; and
 8. denying the case before day 30.
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**Failure to
Schedule an
Interview**

Federal regulations require that all SNAP applications include an interview. An interview must be conducted even if it appears that the application is complete and only verifications are required. Conducting the interview ensures that:

- the information provided on the application is complete and accurate;
- the applicant has understood all the questions; and
- all information that may affect eligibility is captured in BEACON.

The interview is also an opportunity to address any questions or concerns the applicant or client may have, which may reduce future telephone calls to the case manager.

With the exception of a walk-in application during which an interview takes place immediately, all applications require that the case manager contact the applicant or client for an interview within two days of the receipt of the application. (See Field Operations Memo 2006-30, *FS (NPA or PA) Application Processing Guidelines.*)

If no contact can be made by day two, the case manager must send one of the following BEACON-generated letters:

1. Food Stamp Application Appointment Letter for an In-Office Interview; or
2. Food Stamp Application Appointment Letter for a Telephone Interview.

Sending a BEACON-generated appointment letter ensures that a record of the scheduled appointment will appear in the Document History window of BEACON. (See Field Operations Memo 2007-16, *The BEACON-Generated Food Stamp Application Appointment Letters and the Food Stamp Notice of Missed Interview.*)

At application, case managers must waive the face-to-face interview in favor of a telephone interview for any circumstance that would pose a hardship on the client. Such circumstances include, but are not limited to, difficulty caused by:

- employment;
 - dependent care issues;
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Failure to Schedule an Interview (continued)

- transportation issues, including lack of transportation or the high cost of gasoline; or
- age or disability.

Note: When an interview has been conducted, on the BEACON Narratives tab, the case manager must annotate that an interview has been completed and the method of interview (telephone or face-to-face).

Case managers are reminded to contact the applicant or client to schedule an interview on the day and time indicated by the applicant or client as most convenient to be reached by telephone. When there is an assisting person or organization indicated, the case worker must attempt to contact that person or organization.

Failure to Send a Notice of Missed Interview (NOMI)

If the applicant or client misses the first interview and fails to reschedule the appointment, a *Notice of Missed Interview* (NOMI) must be generated through BEACON and mailed to the applicant or client. Using the BEACON-generated NOMI also creates a record of the notice in the Document History window of BEACON. (See Field Operations Memo 2007-16, *The BEACON-Generated Food Stamp Application Appointment Letters and the Food Stamp Notice of Missed Interview.*)

Note: For combined applications, i.e. TAFDC and SNAP or EAEDC and SNAP, sending a second appointment letter satisfies the NOMI requirement in the Supplemental Nutrition Assistance Program. The case manager must annotate in the Narratives tab of BEACON that a second appointment letter has been sent.

This notice must be sent as soon as possible, but no later than two days after the applicant has missed the interview.

Failure to Provide Verifications

Many negative errors result from incorrect procedures regarding verifications:

1. Optional Verifications

In SNAP, all proofs of expenses are considered optional verifications. These include proof of shelter, utility payments, medical expenses, dependent care expenses and child support payments. An applicant or client is not required to provide these verifications, even though he or she might qualify for a higher benefit by doing so. No application should be denied for failure to provide these optional verifications. In such instances, the case manager must approve the application and enter the following in the BEACON Narratives tab: **Case approved; expense information outstanding - {type}**.

**Failure to
Provide
Verifications
(continued)**

2. Verifications Exist in the Paper Case Record

Case managers and supervisors must ensure that a verification thought to be missing is actually missing and not present in the paper case record. Additionally, if there is other documentation in the case record that satisfies the verification requirement (e.g. a letter from an employer with the pay information instead of weekly pay stubs), that documentation must be accepted. For auditing purposes, it is crucial that the BEACON electronic case record match the paper case record.

3. Verification is Mandatory for TAFDC or EAEDC but Not Required for SNAP

When dealing with a combined case (TAFDC/SNAP or EAEDC/SNAP), case managers must remember that the different programs do not always require the same verifications. A verification that is mandatory for cash programs could be optional for SNAP or not required at all. When denying a combined case for not providing a verification, case managers and supervisors must ensure that the missing verification is required for SNAP. If it is not required, the SNAP denial will be considered a negative error.

4. Verification Checklist (VC-1) Not Sent

A case must not be closed or denied for a failure to provide a verification without proper documentation that the verification was requested.

A BEACON-generated VC-1 must always be used when requesting verifications; the paper VC-1 may only be used when BEACON is unavailable. When a verification is received, it must be entered on the Verifications tab as received, even if the application will ultimately be denied or closed for failure to provide verifications. (For further information on the verification checklist, see Field Operations Memo 2007-22: *The BEACON-Generated Verification Checklist.*)

Reminder: Case managers must offer to assist applicants with obtaining verifications when the applicant states he or she is having a problem collecting the appropriate documentation.

5. Ongoing Client Has Not Been Allowed Sufficient Time to Provide Requested Mandatory Verifications

Ongoing clients must always be allowed ten days to submit verifications before the case is closed for failure to submit verifications.

**Failure to
Provide
Verifications
(continued)**

6. Applicant Has Not Been Allowed Sufficient Time to Provide Requested Mandatory Verifications

Applicants and reapplicants must be must be allowed thirty days before the case is denied for failure to provide verifications. However, if it is determined that the application lacks a mandatory verification at any time after day 20, the case manager must:

- send the client an SNAPNL-2 (formerly FSNL-2, revised 11/2008, see Attachment A) with the “Notice of Pending Status” section completed, listing the verifications that are missing and the date on which day 60 falls;
- place a copy of the SNAPNL-2 in the case record;
- annotate the BEACON Narratives tab that the SNAPNL-2 was sent.

If the client fails to return the verifications by day 30, deny the case for failure to provide verifications, and suppress the BEACON-generated denial notice. To suppress the notice, click on the Suppress Notice radio button in the Interview Wrap-Up EBC Results window of BEACON.

If the client fails to return the verifications by day 60, no further action is required by the case manager. (See 106 CMR 361.930).

If the client returns the verifications within the 60-day time frame, reinstate the case and complete processing in accordance with Field Operations Memo 2006-20; *Processing Denied or Closed Food Stamp AUs*.

**Denial before
the 30th Day**

No SNAP application can be denied before day 30 if the denial reason is failure to complete the application process or failure to provide verifications.

To determine if an application has reached its 30th day, the case manager should visit the Pending Applications/Reinstatement window under the BEACON Office Explorer View Daily Priority Actions window. **If day 30 falls on a weekend or holiday, the SNAP application must be denied on the first business day immediately following the weekend or holiday.**

FS Application Day-30 Denials:

- If an applicant misses a scheduled in-office or telephone interview, and fails to reschedule the interview after being sent a NOMI, the case manager must deny the application on day 30, using the denial reason: *Failure to complete the application process*.
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**Denial before
the 30th Day
(Continued)**

- If the applicant fails to provide one or more mandatory verifications, the case manager must deny the application on day 30 using the denial reason: *Failure to provide verifications*.

Denials allowed before day 30 are limited to:

- finding the applicant ineligible due to a nonfinancial reason, such as student or noncitizen status;
- finding the applicant ineligible due to a financial reason. The case manager must enter the financial information into BEACON as received and process the application. BEACON will deny the application on or before day 30 for the appropriate financial reason (e.g. excess income or assets).

Note: While TAFDC and EAEDC regulations allow applications to be denied prior to day 30 if two application interview appointments have been missed, SNAP regulations do not allow this. Case managers must hold the SNAP application until day 30 before denying for failure to complete the application process.

Additionally, even if the applicant has been granted an extension (INT-2) to provide verifications for cash program benefits, the SNAP application must be approved or denied on day 30.

**New Job Aid
and
Additional
Guidance**

A new job aid titled “SNAP Negative Errors and How to Avoid Them” (Attachment B) has been created to assist case managers and supervisors in avoiding negative errors while processing SNAP cases. This job aid, which lists the most common errors and solutions to these problems, can be found in Policy Online under Job Aids.

For further guidance, case managers should also consult:

- the SNAP Application Processing Workflow job aid provided in Policy Online, for assistance in case processing;
 - Field Operations Memo 2006-30: *FS (NPA or PA) Application Processing Guidelines*; and
 - Field Operations Memo 2007-39: *Food Stamp Program: Negative Errors*, which provides additional examples of negative errors and how to avoid them.
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Questions

If you have any questions, please have your hotline designee call the Policy Hotline.



Commonwealth of Massachusetts
Department of Transitional Assistance

TAO Address

Name _____ Date ___/___/_____ Client Telephone Number _____

Address _____ City/Town _____ ZIP _____

Notice of Denial

Your Supplemental Nutrition Assistance Program (SNAP) application has been denied for the following reason:

Manual Citation: 106 CMR _____

Notice of Pending Status

We are still processing your Supplemental Nutrition Assistance Program (SNAP) application, but we need you to verify the following item(s).

Your application will be denied without further notice if we do not receive these verification(s) by ___/___/____. You will then have to reapply for SNAP benefits.

Manual Citation: 106 CMR 361.930

If you need help in getting these verification(s), please contact us immediately. You may either bring in, mail in, or fax the verification(s) to us.

If you disagree with this decision, you have the right to a fair hearing. The reverse side of this notice contains important information about your hearing rights. To request a hearing, complete the reverse side of one copy of this notice. **If you have trouble reading or understanding this notice, please feel free to call Recipient Services at 1-800-445-6604. We can help explain it to you.**

Case Manager _____ Supervisor _____ () _____
Area Code – Telephone Number
Fax Number _____

Department Use Only

Office _____ PA NPA (circle one) _____ Social Security Number _____ CAN _____
Category _____

NOTICE OF FAIR HEARING REQUEST

If you have trouble reading or understanding this notice, please feel free to call Recipient Services at 1-800-445-6604. We can help explain it to you.

YOUR RIGHT TO APPEAL: If you disagree with any action or inaction taken by the Department of Transitional Assistance (DTA), you have the right to appeal and receive a fair hearing before an independent referee. DTA must receive your request for a fair hearing no later than 90 days from the date on this notice. Exceptions to the 90-day time limit are: (1) you have 21 days to request a hearing on Emergency Assistance (EA) shelter benefits, (2) you have 30 days from the date of mailing of the notice by the Department of Revenue to request a hearing regarding the intercept of your state tax refund, (3) you may appeal the amount of your Food Stamp (FS) benefits at any time during your FS certification period, if you think you are not receiving the correct amount, (4) you have up to 120 days if DTA fails to act on your request for services, and (5) you have up to 120 days to appeal alleged coercive action or otherwise improper conduct or up to one year under certain specified circumstances.

HOW TO APPEAL: If you wish to request a fair hearing, send this page with the bottom section completed to: DTA, Division of Hearings (DOH), P.O. Box 120167, Boston, Massachusetts 02112-0167 or fax to (617) 348-5311. Please keep the copy for your own records.

IF YOU ARE CURRENTLY RECEIVING BENEFITS, READ THIS SECTION: Your benefits will be continued until a decision is made on your appeal if DOH receives your appeal request within 10 days from the date on this notice. If you are appealing a FS issue, and your FS certification period ends before your appeal is decided, you will continue to receive the same FS benefits only until the end of your certification period. If you receive benefits during your appeal, but lose your appeal, DTA can recover the benefits to which you were not entitled. If you receive TAFDC time-limited benefits during an appeal, which you then lose, the months for which you have received benefits will count toward your time-limited benefits. If you do not wish to continue to receive benefits during your appeal, check Box A below. If you do not receive benefits during your appeal, and you win your appeal, DTA will promptly correct any underpayment.

WHEN THE HEARING WILL BE HELD: You will be given at least 10 days notice prior to the fair hearing of the date, time and place of the hearing to permit you time to prepare your case. If you wish to have a fair hearing scheduled sooner, check Box B below. Fair hearings on EA shelter benefits are expedited; you will be given at least two days notice prior to the fair hearing of its date, time and place. If you have good cause for not being able to attend the fair hearing, please contact DOH at (617) 348-5321 or 1-800-882-2017 (TTY (617) 348-5337 or 1-800-532-6238 for the Deaf or hard-of-hearing), before the hearing date, so that your hearing can be rescheduled. Failure to appear at the fair hearing without good cause may result in the dismissal of your appeal, except for the first scheduled hearing involving any aspect of the FS Program where good cause for rescheduling need not be demonstrated.

YOUR RIGHT TO BE ASSISTED AT THE HEARING: If you cannot speak English or understand it well or if you are Deaf or hard-of-hearing and wish to have DOH provide an interpreter, please write that on this appeal request or call DOH at (617) 348-5321 or 1-800-882-2017, (TTY (617) 348-5337 or 1-800-532-6238) at least a week before the hearing. At the hearing, you may be accompanied by an interpreter, attorney, or other representative at your expense. You may wish to contact a local legal services office or community agency for assistance. Information about local legal services offices and other services provided by community agencies in your area can be obtained by contacting your local office. These agencies may provide advice or representation at no cost to you.

You or your representative may subpoena witnesses, present evidence and cross-examine witnesses. The referee must make a decision on all evidence presented at the fair hearing. You or your representative will be permitted to see your case file before the hearing. If you want to review your case file, schedule an appointment with your worker before the hearing.

NONDISCRIMINATION NOTICE FOR CLIENTS: Under federal and state law the Massachusetts DTA does not discriminate on the basis of race, color, sex, sexual orientation, national origin, religion, creed, age or disability. If you have any questions or concerns, we encourage you to contact the Director of Equal Opportunity, DTA, 600 Washington Street, Boston MA 02111, Tel. (617) 348-8490 (TTY (617) 348-5532 for the Deaf or hard-of-hearing).

I, _____, hereby request a fair hearing before a referee of DOH.

- A. I do not wish to continue receiving the disputed amount of benefits during the appeal process.
B. I request an expedited hearing.

The reason I wish to request a fair hearing is _____

Your Name (Print) _____ SSN _____

Address _____ Telephone () _____

City/ZIP _____ Date _____

Your Signature _____

My authorized representative is: Name _____ Title _____

Address _____ City/ZIP _____

Telephone () _____

SNAP Negative Errors and How to Avoid Them

Area	Issue	Appropriate Case Manager Action
Interview	No interview scheduled or completed.	<ul style="list-style-type: none"> • Attempt contact by telephone on day of application. If no contact by second day, send the BEACON-generated Food Stamp Application Appointment Letter for in-office or telephone interview. (See F.O. Memo 2007-16.) • If contact made, conduct interview. Annotate BEACON Narratives tab that interview was completed and method used (telephone or in-office interview.)
Missed interview	No Notice of Missed Interview sent (NOMI) after client misses the initial interview and did not reschedule.	<ul style="list-style-type: none"> • Send Notice of Missed Interview (NOMI) no later than two days after missed interview. (See F.O. Memo 2007-16.) • For combined applications (TAFDC/SNAP or EAEDC/SNAP) the sending of a second appointment letter satisfies the NOMI requirement. Annotate the BEACON Narratives tab that a second appointment letter has been sent.
Verifications	Denial of a case for lack of an optional verification.	<ul style="list-style-type: none"> • Process case without optional verification. • Annotate BEACON Narratives tab: Case approved; expense information outstanding- { type}.
	Denial of case for a verification thought to be missing but it is actually in case record.	<ul style="list-style-type: none"> • Review case file to determine if the verification is present or if there is an acceptable document that satisfies the requirement. • Ensure that the BEACON Verifications tab is updated to reflect that verification has been received if present in case record.
	Denial of SNAP case for verification required for TAFDC or EAEDC but not required for SNAP eligibility.	<ul style="list-style-type: none"> • Review SNAP policy or consult a supervisor to determine if the verification is required for the Supplemental Nutrition Assistance Program.
	No Verification Checklist provided to client.	<ul style="list-style-type: none"> • Complete the BEACON-generated VC-1 and give or mail it to the client. • Note: A Paper VC-1 is to be used only when BEACON is unavailable.
	Denial of case on Day 30 without allowing ten days for return of verifications. Mandatory verification requested after Day 20.	<ul style="list-style-type: none"> • Send SNAPNL-2 (revised 11/2008) with <i>Notice of Pending Status</i> section completed. Place a copy of SNAPNL-2 in case record. • Annotate BEACON Narratives tab that SNAPNL-2 has been sent. • On Day 30 deny case for failure to provide verifications and suppress the denial notice in the Interview Wrap-up EBC Results window of BEACON. • If verifications are received by Day 60, process case. • If verifications are not received by Day 60, no case manager action is required.
Application Denial or Case Closing	Denial of case <i>before</i> Day 30 for <i>Failure to complete application process</i> and <i>Failure to provide verifications</i> .	<ul style="list-style-type: none"> • Review BEACON <i>Pending Applications/Reinstatement</i> view daily. Deny cases that have reached Day 30. • If Day 30 is on the weekend or holiday, deny the case on the next business day following that weekend or holiday. • If client missed the interview and did not reschedule after NOMI was sent, deny case for <i>Failure to complete application process.</i> • If mandatory verifications are missing, deny case for <i>Failure to provide verifications.</i>
	Denial/closing of case for whereabouts unknown when forwarding address is noted on returned mail.	<ul style="list-style-type: none"> • If the new address is in Massachusetts, update BEACON record with new address, forward the returned mail to the new address with a Notice of Returned Mail (RMN-1) requesting verification of new address, shelter expenses, etc. Place copy of RMN-1 in record, and annotate Narratives tab. Case follow-up must be done using the procedures outlined in F.O. Memo 2008-22. • If the new address is out-of-state, process a case closing/denial using <i>Moved out of state</i> as reason. • Note: Do not close if case is on TBA or USR.