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

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Online Guide Transmittal 2020-82
November 25, 2020

To: **Department of Transitional Assistance Staff**

From: **Sarah Stuart, Associate Commissioner for Change Management**

Re: **SNAP: COVID-19 Streamlined Recertification Form to Most Households**

Overview

Online Guide Transmittal (OLGT) 2020-60, issued August 28, 2020, outlined temporary modifications to the SNAP recertification process. These modifications included the replacement of the regular SNAP recertification form with the simplified COVID-19 recertification form, the streamlining of the recertification workflow, and the use of the Interim Report (IR) in lieu of recertification for households whose certification periods were not extended by 6 months in March 2020.

To continue providing relief to both clients and staff during the COVID-19 emergency, the Department will continue simplifying SNAP recertifications by merging COVID-19 recertifications and IRs in lieu of recertification as follows:

- The Department will extend the use of the COVID-19 recertification form to all SNAP-only households with certification end dates on or before December 2021.

- Staff will be able to recertify these households using most of the IR verification and certification procedures.

Note: Bay State CAP households will continue to receive the Bay State CAP recertification form.

The Department is enacting these procedures based on the flexibilities offered through the Continuing Resolution Bill.

Purpose   The purpose of this Online Guide Transmittal is to advise staff of the COVID-19 recertification procedures that were extended under the Continuing Resolution Bill and the corresponding system enhancements.

COVID-19 Recertification   BEACON will automatically mail the COVID-19 recertification form to SNAP households that:

Criteria

- have certification end dates from November 30, 2020 through December 31, 2021;

- have no associated TAFDC or EAEDC case;

- are not Bay State CAP; **and**

- have a Simplified Reporting certification type (i.e., 12 months, 24 months, EDSAP, or Former EDSAP).

The Department will continue using the COVID-19 form for SNAP recertifications until December 2021.

DTA Connect   Clients meeting these criteria can submit the COVID-19 recertification form online through the DTA Connect website via the COVID-19 recertification page (which was implemented with the issuance of 2020-60).

Voter Registration   The Department will continue sending the Voter Preference Form with the COVID-19 recertification form, but in a separate envelope to prevent the Voter Preference Form from being erroneously returned.

Interview Waived and Interview Page   COVID-19 recertifications mirrors the IR interview process, **interviews are not required for COVID-19 recertifications**. For EDSAP households, the Interview Held radio button in the Interview page will default to No with the reason: "Elderly/Disabled with no Earned Income." For non-EDSAP households, the reason will default to "COVID-19 Interview Waived."

Phone Page   If client contact is required because information is missing on the COVID-19 recertification, or the information is questionable contradictory 3 cold call attempts must be completed. The case manager must update the Phone page by checking the Performed box. If the client answers, indicate Yes in the Client Answered field. No changes to the Interview page are required.

Pop-up   Whenever a case manager enters a case that has a reevaluation end date between September 2020 and December 2021, BEACON will display a pop-up specifying whether the case is subject to the COVID-19 recertification rules or the regular recertification rules.

COVID-19 Recertification Workflow

Upon initiation of a COVID-19 recertification, BEACON will generate a simplified workflow that only requires visitation to the following pages:

- Household
- Address
- Phone
- 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

Although these are the only pages in the workflow that require visitation, case managers will be able to 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, it must be reviewed and updated accordingly.

COVID-19 Recertification Verification Procedures

IR Verification Elements

COVID-19 recertification households shall be only required to verify the changes that normally require verification at IR. This includes changes in:

- unearned income;
- household composition;
- shelter expenses (if client moves)
- child support expenses.
- earned income (discussed below as an exception)

Note: Although case managers are normally required to review Work Rules participation and exemptions at IR for households containing ABAWDs, the ABAWD Work Rules are currently suspended due to COVID-19 (as per OLGT 2020-38).

Earned Income

While the COVID-19 recertification form contains change/no change similar to that of an IR, there is no $100 reporting threshold for earned income. The COVID-19 recertification form instructs clients to verify earned income.

If a client submits updated wages with the COVID-19 recertification, the wages must be entered into BEACON regardless of whether the client indicated a change or not.

COVID-19 Recertification Verification Procedures (continued)

Work Number

If a client reports no change and does not send in updated wages, the case must be processed with the income on record.

If a client **indicates a change in earned income** or that a household member has a new job, and wages are not provided, staff must first review Work Number. If the wages are available in Work Number, those wages must be used. If the wages are not available in Work Number, the case manager must send a mandatory VC-1 for earned income. Since interviews are no longer required for COVID-19 recertifications an appointment letter must not be sent.

If a client leaves the earned income question unanswered and does not submit paystubs, the case manager must perform 3 cold calls to the client. If the client answers, discuss the issue of earned income.

If the client indicates that they are working, check Work Number to see if wages for that employer are displayed there. If yes, tell the client so the wage information may be confirmed by the client. If the client disputes the wages on Work Number, the client must be sent a mandatory VC-1 for documentary evidence of earnings.

If the client indicates that there is no earned income and there is an active Work Number match displaying wages within the last 30 days of the date the case manager is reviewing the case, a mandatory VC-1 for proof of termination must be sent. If the client indicates that they are having difficulty obtaining verification, staff must attempt collateral contact. Remember to document all attempts of collateral contact in the narrative. If collateral contact is unsuccessful, a written self-declaration will be accepted as a last resort.

If the client indicates they are not working and there is no active Work Number match displaying income within the last 30 days of the date the case manager is reviewing the case, the client may verbally self-declare the termination.

If the client does not answer any of the cold calls, send a mandatory VC-1 for proof earned income.

If Work Number appears as an outstanding PI Checklist item, it must be addressed.

COVID-19 Recertification Verification Procedures (continued)	Sections on the COVID-19 recertification form that the client left blank must be accepted by staff as a self-declaration that the eligibility factor has not changed. Verification is not required if the client indicates no change, per standard IR procedures, **except for earned income.**
Self-Declarable Verifications	If the client returns a COVID-19 recertification in which s/he reports a change without providing verification, but the item can be verified via verbal self-declaration, the case manager must make 3 cold call attempts to verify the outstanding item(s) via verbal self-declaration. If the cold calls are unsuccessful or the case manager is unable to obtain the verbal self-declaration, a VC-1 with the outstanding item(s).
Optional Verification Procedures	If the case manager sends a VC-1 and the VC-1 only includes optional verifications, process the recertification without giving credit for the outstanding optional verification item(s). However, if processing the recertification without crediting the optional verification item(s) results in the closure of the case, do not process the recertification until the date the client provides verification(s) or the closing date (last day of the client's cyclical month), whichever occurs first. To ensure timely closing a follow-up action must be created in this scenario.
Non-Self-Declarable Verifications	If the client returns a COVID-19 recertification in which they report a change but fails to provide verification, and the item **cannot** be verified via verbal self-declaration, send a VC-1 for the outstanding verification. Before sending the VC-1, check whether the item requiring verification:

- is a permanent verification that was already provided;
- is available through a verified-upon-receipt-source; or
- can be verified by another scanned document in the Electronic Case Folder.

If the case manager cannot verify an item(s) based on the information available, send the VC-1.

    Reminder: For COVID-19 recertifications, incomplete does not apply to questions that are left blank. If a question is left blank, staff must treat it as a self-declaration that the eligibility factor has not changed. **This does not apply to earned income.** |

Automated Processing Criteria	BEACON will automatically process a COVID-19 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 (PI) checklist. BEACON will not automatically process a COVID-19 recertification uploaded through DTA Connect via photograph. To be eligible for automated processing, the COVID-19 recertification must be completed online through the DTA Connect web portal or submitted to the Document Processing Center.
Batch Narrative	Whenever BEACON automatically processes a COVID-19 recertification, a batch narrative will state that the form was processed with no changes.
Action	When the Department receives a COVID-19 recertification form and the form is not automatically processed, BEACON will create an Action for the case manager to process the recertification.
Outstanding Program Integrity Concerns	Staff must address outstanding PI concerns at recertification. It's important to remember that some cases have outstanding PI concerns even if there is no PI checklist warning message, such as possible wage information from DOR. Therefore, before processing a COVID-19 recertification, review the BEACON narratives to determine if the Fraud, Investigations, Data Matching (FIDM) Unit has entered a narrative that requires follow-up by the case manager at recertification. FIDM Unit staff begins each narrative with "DMU." A third level override of a FIDM Unit match must only be done if the case is considered urgent (for example pending eligibility determination such as a recertification approaching its release date) per the established guidance in the Online Guide found at Home > Cross Programs > External Agency Matches.

ADA Requirements

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, make at least 3 cold call attempts to the client to explore whether an accommodation is necessary, regardless of whether an interview is required. If contact is made, complete the ADA Accommodation/Special Assistance Request page.

If the client already has an ADA accommodation in place, ensure that the accommodation is provided, if applicable, during the certification activities. Any additions or changes to accommodations should be recorded in the Accommodation/Special Assistance workflow and entered in the Tracking page. 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.

Interim Reports

A very small number of SNAP cases will continue to receive true IRs. These are primarily NPA cases with an associated TAFDC or EAEDC case, and some SNAP only cases that may fall into a reinstatement scenario. Other clients have already been sent an IR in lieu of recertification as previously described under OLGT 22020-60. These forms must be processed accordingly.

These clients will use the existing online webpages for both true IRs and IRs in lieu of Recertification. BEACON will display the regular IR workflow and case managers must follow the regular IR procedures in both circumstances, however IRs in lieu of Recertification will establish a new certification period.

BEACON will automatically process an IR if it meets the same conditions for automation outlined for COVID-19 recertifications.

BEACON will not automatically process a true IR or an IR in lieu of Recertification uploaded through DTA Connect via photograph. To be eligible for automated processing, the form must be completed online through the DTA Connect web portal or submitted to the Document Processing Center.

**Interim
Reports
(continued)**

Whenever BEACON automatically processes either document, a batch narrative will state that the form was processed with no changes. When the Department receives a true IR or IR in lieu of a Recertification form and the form is not automatically processed, BEACON will create an Action for the case manager to process the case.

Reminder: Interviews are not required for true IRs and IRs in lieu of Recertification.

**Obsolete
Transmittal**

This Online Guide Transmittal obsoletes OLGT 2020-60 - SNAP: Temporary COVID-19 Recertification Modifications and IR Updates

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.