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From the Commissioner

Dear Colleagues,

Thank you for all of your hard work, professionalism, teamwork, and sacrifice to process our overdue SNAP re-certifications. Your efforts are truly unparalleled and I am so proud of, and grateful for, all you have accomplished. The backlog of SNAP re-certifications is essentially eliminated.

Recently we had a very successful visit in Springfield with USDA Under Secretary Kevin Concannon. The Under Secretary met with DTA staff and with stakeholders to discuss hunger, nutrition, and the administration of SNAP. The Under Secretary appreciated our suggestions and will consider them. We sent him a letter after his visit, and excerpts appear below.

We also recently received a letter from USDA regarding our other efforts, which is available on DTA Online for your review.

Thank you again for your dedication. I am humbled by your efforts.

With much appreciation,

Julia E. Kehoe
Commissioner

As you know, Massachusetts has implemented many business process improvements and regulatory waivers to simplify administration of SNAP and to improve client accessibility. Based on our discussion during the meeting, we understand that some of the suggestions may not be feasible due to statutory and other program requirements; however, we appreciate your willingness to consider the proposals. In addition, you indicated there might be an opportunity to enhance some of our existing waivers by exploring methods of administration that would improve efficiency. We are writing to summarize the suggestions raised at the meeting, offer our assistance by providing additional details and information, and propose next steps.

(Continued on page 2)

From the Commissioner *(Continued from page 1)*

Standard Medical Deduction Waiver – DTA recommends that USDA eliminate the requirement to verify medical expenses to grant elderly and disabled clients the standard deduction. The requirement to provide receipts creates a barrier for clients who would otherwise be eligible for increased nutritional benefits, is administratively burdensome, and requires clients to share private information related to their medical needs.

Extending the Agency Time Period for Processing Recertification Applications – Clients have fifteen days prior to the end of their certification period to return their recertification paperwork for processing. Due to program requirements including a client interview (with the exception of the elderly and disabled for whom we have an interview waiver), ten-day advance notification to clients, and the additional time needed for case processing, the agency's ability to complete the case within the required time frames is jeopardized. The fifteen day time period does not allow sufficient time to complete the discrete steps required for SNAP recertification processing. DTA recommends that the time period be extended between five and fifteen additional days. By adding, at minimum, five days to the recertification processing time frame, interruptions in SNAP benefits will be minimized.

Extending the Maximum Client Certification Period from Twelve to Eighteen Months – Nearly all states have experienced significant SNAP caseload growth with shrinking administrative resources. The current national fiscal climate provides an excellent opportunity for reviewing and evaluating program requirements in order to provide administrative relief through the extension of current certification time periods. DTA recommends that USDA extend the client certification period to eighteen months. We understand that you are considering this change as you draft the next Farm Bill, and we fully support the extension.

Eliminating or Delaying the Requirement to Interview Clients at Recertification – Massachusetts expects to receive some administrative relief through the pending reinstatement of the interview waiver for elderly and disabled individuals at recertification. However, for all other households, clients are provided with pre-filled forms at recertification that include their current case information including income, assets, housing costs and any applicable medical deductions. Clients provide updates to this information in order for the agency to complete their recertification. The most difficult aspect of this process is reaching the client to complete the interview. In today's society where people live very busy lives, it is difficult for clients to be available for a telephonic interview to confirm information they have already provided to the agency. This requirement can interrupt the timely delivery of necessary nutritional benefits. In order to improve processing efficiency and eliminate the disruption of benefits to the client, we suggest the requirement to conduct a client interview be either eliminated or delayed, and that benefits continue for a time-limited period until the interview can be completed.

(Continued on page 3)

From the Commissioner *(Continued from page 2)*

Annual Reporting – At the recommendation of USDA, Massachusetts will be moving forward with the state option to implement Annual Reporting in conjunction with an interim report for eligible households. We would like to maximize the efficiency offered by this option by requesting that USDA not require an interim report.

Thirty-Day Reinstatement Waiver – At the meeting, we discussed the possibility of enhancing our existing waiver that allows the agency to reinstate benefits when a client complies with the recertification requirement after the forty-five day time period to respond to the agency request to recertify, but within thirty days of the date of the expiration of benefits. Currently, the agency must terminate benefits by closing the SNAP case (and therefore sending the client a closing letter), which results in an interruption of benefits and stress to the client. If the client is determined to still be eligible, DTA reinstates the case and provides retroactive benefits. We would like to work with you to determine methods of administration that will streamline this process.

From the Hotline

If you have any questions on this column or other policy and procedural material, please have your Hotline designee call the **Policy Hotline at 617-348-8478**.

- Q.** We received a SNAP application in our TAO today. I tried a few times to reach the applicant by telephone, but she didn't answer. Should I leave a message on her cell phone's voice messaging system?
- A.** Yes. If you are trying to get in touch with an applicant or client to schedule an interview, leaving a message on his or her phone is acceptable in most cases and saves time. (For exception, see question and answer below.)

Important: SNAP clients with pre-paid cell phones may not answer their phones, if the incoming telephone number is unfamiliar to them. Because they are charged by the minute, it may be too expensive for these clients to use the phone without first knowing the identity of the caller. For this reason, case managers should leave their name and a message explaining that they will be calling back in a few minutes to conduct an interview.

- Q.** When is it unacceptable to contact or leave messages on a SNAP client's phone?
- A.** For confidentiality reasons, do not mention that you are calling from DTA regarding the SNAP Program. For security reasons, some clients may not accept a phone call when the caller's identity is unknown. **Also, remember that we are prohibited from contacting or leaving messages with certain clients.**

A SNAP applicant or client who decides to use the heightened level of security (HLS) option or is currently coded as an HLS case cannot be contacted by telephone. Under no circumstances should Department staff leave a phone message for SNAP applicants or clients who select this option.

Note: As indicated in Field Operations Memo 2010-50, the HLS procedures also apply to TAFDC and EAEDC cases.

- Q.** What if an applicant gives me her phone number, but when I try contacting her, it is clearly another individual who is answering her phone?
- A.** In cases that are not restricted by having a heightened level of security, information regarding the case should only be given by telephone when case managers believe that they are communicating with the applicant or client. When in doubt, the applicant or client should be contacted at another time, by phone or in writing.

Remember that if you receive an application (day one), but are unable to speak with and screen the SNAP applicant by phone, an appointment letter must be sent through the mail by the following day (day two).



Operations Memos

Prioritizing SNAP Recertifications by Release Date

SNAP

Operations Memo 2011- 8A

Beginning with April's SNAP issuance, the automatic closing for failure to recertify for continuing eligibility has resumed. If the household has not been recertified by the appropriate BEACON Release Date for the next SNAP benefit issuance cycle, the household will be closed automatically. Closings will occur on a cyclical basis according to the last digit of the case Social Security number (SSN).

This memo advises supervisors and case managers of their responsibilities for prioritizing completion of recertifications and provides information about available tools to use to prioritize recertifications by the Release Date in order to process them within BEACON time frames. These tools are:

- Actuate reports;
- the AU Closing and Reduction Schedule found in Actuate; and
- the Reevaluations in Progress view.

A new Job Aid entitled *SNAP Automated Closing Process* is included as Attachment A of the Operations Memo and is also available in DTA Online in the Training folder under Job Aids/Desk Guides. This Operations Memo obsoletes Field Operations Memo 2009-29 and Operations Memo 2011-8.

Jewish Vocational Services (JVS) Partial Shutdown, Lawrence Department of Training and Development Shutdown

TAFDC

Operations Memo 2011-10

This Operations Memo served to advise staff that, the Jewish Vocational Services (JVS) suspended operations effective March 31, 2011 in the following TAOs: Malden and Revere. JVS did not suspend operations in Boston. Additionally, the City of Lawrence's Department of Training and Development suspended operations on that date as well. Both of these programs are CIES programs.

Corporation for Public Management (CPM) Partial Shutdown

TAFDC

Operations Memo 2011-11

This Operations Memo advised TAO staff that the Corporation for Public Management (CPM), which is a CIES vendor, suspended operations effective March 31, 2011 in the following TAOs: Brockton, Dudley Square, Newmarket Square, Malden, Revere Springfield Liberty and Springfield State. Therefore, effective with this Operations Memo, no referrals to CPM CIES could be made by TAO staff in these TAOs. However, CPM's Young Parents Program in Springfield and Holyoke will remain open until further notice.

Operations Memos

SNAP: Cost-of-Living Changes

SNAP

Operations Memo 2011-14

The cost-of-living adjustment (COLA) is a mass change that is applied yearly to the SNAP caseload. On the weekend of April 9, 2011, active SNAP cases were updated with the new COLA standards. This recalculation will impact the household's monthly benefit for May. The SNAP eligibility charts and issuance tables remain unchanged, however, the following elements of the COLA will change effective May 1, 2011.

- **Shelter Deduction** - The maximum shelter deduction (for households without an elderly or disabled member) **has decreased to \$458.**
- **Standard Deduction for Household Sizes One, Two and Three:**
The standard deduction for household sizes one to three **has increased to \$142.** The standard deduction for household sizes four and above remains unchanged.
- **Standard Utility Allowance (SUA)**
 - The Heating/Cooling SUA **has decreased to \$575;**
 - The Nonheating SUA **has decreased to \$353;** and
 - The Phone SUA **has decreased to \$41.**

Based on the significant reduction of the Heating/Cooling SUA and the Nonheating SUA, many SNAP households experienced a decrease in SNAP benefits when the new COLA figures were applied.

FYI

EAEDC Noncitizen Applicants and SSI Applications

As a condition of eligibility, most EAEDC applicants must apply for Supplemental Security Income (SSI). Policy at 106 CMR 320.620 states in part: "A noncitizen applying for EAEDC benefits must meet the following criteria, unless a good cause exception exists: (a) not be eligible for or not have unreasonably failed to apply for SSI..."

Certain noncitizens (Legal Permanent Residents (LPR) who have not been in the country for five years) will not meet the SSI criteria. Therefore, effective immediately, those noncitizens who do not meet basic SSI citizenship criteria do not have to apply for SSI as a condition of applying for EAEDC. Once the noncitizen's status changes (the LPR has been in the country for five years or the LPR's medical condition warrants an SSI application), the noncitizen must apply for SSI. Case managers must follow-up with these noncitizens to ensure that this application occurs.

Ongoing EAEDC cases with noncitizen heads of households will continue to be a part of the automated SSI application process and are not impacted by this change.

TAO Meeting Notes