



**Commonwealth of Massachusetts**  
*Executive Office of Health and Human Services*  
**Department of Transitional Assistance**  
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**Field Operations Memo 2009-67**  
**December 18, 2009**

**To:** Transitional Assistance Office Staff  
**From:**  John Augeri, Assistant Commissioner for Field Operations  
**Re:** SNAP Program Access Review

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**Overview**

The Department of Transitional Assistance and USDA are committed to providing eligible low-income households with full access to Supplemental Nutrition Assistance Program (SNAP) benefits. To ensure program access, USDA conducts a yearly nationwide review of selected state offices providing SNAP benefits. The purpose of this review is to evaluate customer service in local offices and to identify and eliminate barriers to participation.

This year, USDA conducted a Program Access Review at the Revere TAO. The purpose of this memo is to describe the results of the review so all TAO staff can benefit from USDA's observations and findings.

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**USDA  
Program  
Access  
Review**

USDA Food and Nutrition Service conducted the annual Program Access Review at the Revere TAO in August 2009. The review included:

- an analysis of 116 new, recertified, closed, and denied PA and NPA SNAP cases for the sample month of April 2009;
  - interviews with TAO staff members, SNAP clients and local community partners; and
  - observations of daily operations in the TAO's reception/waiting areas.
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**USDA  
Program  
Access  
Review  
(continued)**

In its letter to the Department summarizing the review, USDA's Food and Nutrition Service (FNS) wrote, "The Food and Nutrition Service was impressed with both the level of customer service provided and the commitment to program access displayed by the Revere TAO staff." The report also highlighted several positive initiatives performed at the TAO, including providing services at satellite offices, providing local office liaisons for partner agencies, and promoting nutrition education in the office.

While recognizing the Department's successes in providing good customer service and in demonstrating commitment to providing full access to SNAP nutrition assistance, USDA also cited two areas in which the Department must strengthen procedures to comply with federal requirements:

- The Department was unable to locate all case records that FNS requested for review.
- The Department sometimes failed to give the client 10 days, on the Verification Checklist, to provide verifications.

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**Case Records  
Must Be  
Available**

*The reviewers found that the Department was unable to locate all case records that FNS requested for review.*

Federal regulations require that case records contain documentation to support eligibility, ineligibility, and benefit level determinations. Documentation must be detailed enough to permit a reviewer to determine the reasonableness and accuracy of the determination.

FNS requested a total of 120 case records for review. DTA was able to provide 109 original case records. Because all case records requested were not located, the Department must implement a corrective action plan to ensure the completeness and availability of all case records.

Staff are reminded that compliance with the terms of Executive Order 504, *Security and Confidentiality of Personal Information*, helps ensure that case records can be located quickly and easily. Executive Order 504 requires that staff store case records securely when not in use to prevent unauthorized inspection or disclosure of personal information. At the end of each workday, case records must be filed away and not left accessible in the work area. Compliance with the terms of this order will not only ensure confidentiality but also will reduce incidences of missing case records.

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**Case Records  
Must Be  
Available  
(continued)**

In addition, the Department is considering two initiatives to improve the management of case records:

- The Department is discussing plans for each TAO to maintain a central filing area which will ensure both the confidentiality and the availability of client case records.
  - The Department is moving toward document management with the goal of scanning verifications into the electronic case record.
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**Clients Must Be  
Given 10 Days to  
Provide  
Verifications**

*The reviewers found that the Department sometimes failed to give the client 10 days, on the Verification Checklist, to provide verifications.*

Clients must always be allowed at least 10 days to provide required verifications. The Verification Checklist (VC-1) must include the date the verifications are due, which must be at least 10 days from the date the VC-1 is created. **This is true even if a VC-1 is sent after Day 20 of a pending application period.**

Field Operations Memo 2008-59, *Supplemental Nutrition Assistance Program (SNAP): Negative Errors and Application Processing*, provides detailed guidelines to be followed to ensure that SNAP applicants and ongoing clients are given sufficient time to provide requested mandatory verifications. In particular, these guidelines include instructions on how to proceed when it is determined any time after Day 20 in the 30-day application period that an application lacks a mandatory verification. The memo also includes instructions on the use of the SNAPNL-2 form with the “*Notice of Pending Status*” section completed.

Additional guidance on verification timeframes can be found in Field Operations Memo 2006-20, *Processing Denied or Closed Food Stamp AUs*, and Field Operations Memo 2006-30, *FS (NPA or PA) Application Processing Guidelines*. A *SNAP Application Workflow* job aid can also be found in Policy Online.

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**Questions**

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

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