



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


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**Online Guide Transmittal 2020-68
October 6, 2020**

To: Department of Transitional Assistance Staff
From:  Sarah Stuart, Associate Commissioner for Change Management
Re: SNAP: Application and Recertification Interview Waiver

Overview and Purpose

Under the Continuing Resolution Bill that was recently passed, the Food and Nutrition Service (FNS) has renewed the waiver of the SNAP application and recertification interviews when all mandatory verifications are satisfied. This waiver is applicable through June 31, 2021.

System enhancements to support the interview waiver will be reinstated as well as additional enhancements to streamline the application workflow similar to that of the COVID-19 recertification workflow.

The purpose of this Transmittal is to advise staff that eligible SNAP application and recertification interviews are waived, and that temporary procedural modifications have been placed on the expedited issuance process.

Waived SNAP Application Interview

Current Pending SNAP Applications

All pending SNAP applications are eligible for this waiver. Pending applications that do not have an outstanding Verification Checklist (VC-1), and the Interview Held radio button is either blank, or *No* with a reason of Interview Missed, will be routed to the SNAP Applications with No Interview Held action pool. Staff must review these SNAP Applications using the procedures outlined below.

**Applications
with All
Mandatory
Verifications**

If an application is received and all questions related to mandatory verifications have affirmative answers, for example, income or U.S. citizenship status, where staff are able to verify all mandatory verification elements by accessing external databases and information provided by the applicant, then the SNAP Application Interview must be waived. The application must be processed using the available information.

Remember: Wages must be verified. If the Work Number does not have the wage information for the client's job, send a mandatory VC-1 for earnings and encourage the client to obtain and submit documentary evidence such as wage stubs, screen shots, or a printout/letter from the employer. If a client cannot verify wages using documentary evidence, we will accept the best available information including a written self-declaration.

Temporary COVID-19 procedures are still in place for all other verification factors, including terminated income.

**Expedited
Eligibility**

If all mandatory verifications are available, SNAP applications must be processed for regular, ongoing benefits. Staff must answer *No* to all expedited screening questions for these cases but make every effort to issue ongoing benefits within 7 days to satisfy expedited timelines.

If mandatory verifications are missing and the cold call attempts are unsuccessful, review the application to determine if there is enough information to screen for eligibility of expedited benefits. Identity is the only mandatory verification for expedited benefits. In addition, an appointment letter and VC-1 must be sent.

If there are outstanding optional verifications, 3 cold call attempts must be made to obtain verbal self-declarations. If unsuccessful in reaching the applicant, issue a VC-1. If a VC-1 is sent, process the application immediately without giving credit for the outstanding optional expenses.

Important: If a cold call is conducted to clarify missing or contradictory information and it is successful, code the Interview page as Interview Held *Yes*.

Exception to processing without optional verifications: If processing the application without giving credit for expenses results in denial, case managers must wait to process the application until the client provides verifications or Day 30, whichever occurs first.

**Applications
with Outstanding
Mandatory
Verifications**

Interviews cannot be waived unless/until the mandatory verifications are satisfied. This may include situations where information related to mandatory elements must be clarified.

If there is missing information but the applicant was previously known to BEACON and the missing information can be reasonably ascertained, contact is not required.

If an applicant was recently known to have different circumstances, for example, additional household members or sources of income, but only indicated a household of one, or reported that there was no source of income on the new application, process the application using the new information reported on the application, as long as there are no other outstanding elements.

When an application is received that has outstanding mandatory elements, 3 cold call attempts must be made to reach the applicant. If they are unsuccessful, the client has HLS or does not have a phone number on file, issue a VC-1 that specifically identifies what is outstanding. Follow the procedures outlined in the Online Guide page SNAP Simplified Reporting – Interim Report under the Establishing Contact at IR When Information is Incomplete, Questionable, or Contradictory in conjunction with verification procedures. References to Interim Reports in the Online Guide page must be substituted for SNAP Application.

A SNAP Application Interview must be scheduled when a VC-1 for mandatory verifications is issued.

Staff must use the free-form text boxes on the VC-1 by entering a User-Entered verification element of a mandatory “Additional Verification” with the following:

“You are receiving a Verification Checklist and an Application Interview Appointment. We have changed procedures due to COVID-19. If you gave us the verifications we asked for, we will not need to interview you.”

If the client provides the mandatory verifications, an interview is no longer needed. In that instance, cancel the scheduled interview, mark the VC-1 element as verified, and process the SNAP application.

If an interview is missed, BEACON will automatically generate a *Notice of Missed Interview* (NOMI). If mandatory verifications are not provided, BEACON will automatically deny the application for failure to provide which will allow for a reinstatement should the client satisfy the requirements within the allowable timeframes.

Applications with Outstanding Mandatory Verifications
(Continued)

Exception: SNAP Applications that come from MassHealth (indexed as SNAP Application – MH Senior Applications) must be treated as having missing mandatory elements because they only collect basic demographic information for the head of household.

Waived Recertification Interview

Current Pending SNAP Recertifications

All SNAP recertifications where interviews were previously required that do not have an outstanding VC-1 and the Interview Held radio button is either blank, or *No* with a reason of Interview Missed will be routed to the SNAP Recertifications with No Interview Held action pool. Staff must process these SNAP recertifications using the procedures below.

Recertifications with All Mandatory Verifications

If a recertification is received that normally requires an interview and all questions related to mandatory verifications have affirmative answers, and staff are able to verify all mandatory verification elements by accessing external databases and information provided by the applicant, then the Recertification Interview must be waived. The recertification must be processed using the available information.

Remember:

- households where all adult members are elderly and/or federally certified as disabled and have no earned income are still waived from the interview process regardless of whether the client is missing information. Only cold call or send a VC-1 for the missing information. No appointment is to be scheduled.

IMPORTANT: Unlike applications, coding the Interview Held as *Yes* does not apply when cold calls are made to clarify information on the recertification form. The interview page should continue to reflect the Elderly Disabled with no Earned Income waived interview reason.

- wages must be verified. If the Work Number does not have the wage information for the client's job, send a mandatory VC-1 for earnings and encourage the client to obtain and submit documentary evidence such as wage stubs, screen shots, or a printout/letter from the employer. If a client cannot verify wages using documentary evidence, we will accept the best available information including a written self-declaration.
 - temporary COVID-19 procedures are still in place for all other verification factors, including terminated income.
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**Recertifications
with All
Mandatory
Verifications**
(Continued)

Sections on the form that the client left blank are to be accepted by staff as a self-declaration that the eligibility factor has not changed. Staff must continue to check available data sources when completing the Recertification process. Clients are instructed on the Recertification form to send verification of new income sources that are not available through data matches or sources.

If there are outstanding optional verifications, make 3 cold call attempts to obtain verbal self-declarations, if unsuccessful, issue a VC-1 and process the recertification immediately without giving credit for the outstanding optional expenses.

Exception to processing without optional verifications: If processing the recertification without giving credit for expenses results in the case being closed, wait to process the recertification until the client provides verifications or the closing date (last days of the client's cyclical month), whichever occurs first.

**Recertifications
with Outstanding
Mandatory
Verifications**

Interviews cannot be waived unless/until the mandatory verifications are satisfied. This may include situations where information related to mandatory elements must be clarified.

If there is missing information but that information can be reasonably ascertained by the case manager, contact is not required.

If a client was recently known to have different circumstances, for example, additional household members or sources of income, but on the recertification only indicated a household of one or reported that there was no source of income, process the recertification using the information reported, as long as there are no other outstanding elements.

When a recertification is received with outstanding mandatory elements, make 3 cold call attempts to reach the client. If the attempts are unsuccessful, the client has HLS or does not have a phone number on file, issue a VC-1 that specifically identifies what is outstanding. Follow the procedures outlined in the Online Guide page SNAP Simplified Reporting – Interim Report under the Establishing Contact at IR When Information is Incomplete, Questionable, or Contradictory in conjunction with verification procedures.

Remember: If you conduct a cold call to clarify missing or contradictory information and it is successful, you must code the Interview page as Interview Held *Yes*.

**Recertifications
with Outstanding
Mandatory
Verifications
(Continued)**

Exception: households where all adult members are elderly and/or federally certified as disabled and have no earned income are still waived from the interview process. If contact is made to clarify missing or contradictory information you must code the Interview page as Interview Held *No*. The interview page should continue to reflect the Elderly Disabled with no Earned Income waived interview reason.

If a SNAP Interview is scheduled a VC-1 for mandatory verifications must also be issued.

Staff must use the free-form text boxes on the VC-1 by entering a User-Entered verification element of a mandatory “Additional Verification” with the following:

“You are receiving a Verification Checklist and a Recertification Interview Appointment. We have changed procedures due to COVID-19. If you gave us the verifications we are asking for, we will not need to interview you.”

If the client provides the mandatory verifications, an interview is no longer needed. In that instance, cancel the scheduled interview and process the recertification.

If an interview is missed, BEACON will automatically generate a *Notice of Missed Interview* (NOMI). If mandatory verifications are not provided, BEACON will automatically close the case for failure to provide verifications which will allow for a reinstatement, should the client satisfy the requirements within the allowable timeframes.

**Coding
Interviews in
BEACON**

Systems changes have been enabled to ensure the accurate coding of waived interviews and client contact.

For all applications and recertifications that do not require client contact the SNAP interview waived option *COVID-19: Interview Waived* must be selected.

If client contact is required because mandatory verifications are outstanding, information is missing on the application or recertification, or the information is questionable or contradictory 3 cold call attempts must be completed.

**Coding
Interviews in
BEACON**

The case manager must update the Phone page by checking the Performed box. If the client answers, indicate *Yes* in the Client Answered field. The Interview page must also be coded by selecting the Interview Held *Yes* radio button.

If contact is not successful and outstanding mandatory verifications are needed an interview must be scheduled and a VC-1 sent. If the interview is missed, BEACON will automatically issue a NOMI; staff intervention is not required.

If the client was required to have an interview because mandatory verifications were outstanding, but the client subsequently provided those verifications before the interview appointment, cancel the scheduled interview.

For recertifications where all adult members are elderly and/or federally certified as disabled and have no earned income interviews are still waived regardless of whether the client is missing information. Only cold call or issue a VC-1 for the missing information. No appointment is to be scheduled. The interview page must continue to reflect the Elderly Disabled with no Earned Income waived interview reason.

Staff must write a Narrative to reflect the action taken on each case, detailing if the interview was waived due to COVID-19 along with any other pertinent information about the case.

The automatic scheduling of interviews for applications will be suspended while the interview waiver is in place.

Note: If you have a client applying for any program without a phone number, with an in-office ADA accommodation, or with HLS please contact the Ombuds office.

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.
