



DEVAL L. PATRICK
Governor

TIMOTHY P. MURRAY
Lieutenant Governor

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

JUDYANN BIGBY, M.D.
Secretary

JULIA E. KEHOE
Commissioner

Operations Memo 2011-33A
July 12, 2011

To: Transitional Assistance Staff
From: Stephanie Brown, Assistant Commissioner for Policy, Program and External Relations
Re: SNAP: Automating Two Additional Categorical Eligibility Groups in BEACON

Overview

In June 2008, the Department implemented maximized categorical eligibility for SNAP households. These changes were transmitted in Field Operations Memo 2008-27. The expansion meant that almost all SNAP NPA households would be categorically-eligible barring a few exceptions, for example, households with a member disqualified due to an IPV. Two new categorically eligible groups were defined, but BEACON programming to automate the categorical-eligibility determination for the new groups had not yet been implemented.

Certain eligible one and- two-person households of the new categorically-eligible groups were automatically denied the minimum SNAP benefit payment of \$16. Certain households of three or more of the new categorically-eligible groups were also automatically denied SNAP benefits instead of being approved at a zero benefit level.

Purpose of Memo

The purpose of this memo is to inform staff of BEACON programming which will automate the two categorically eligible groups introduced in 2008. This memo will:

- define the two categorical eligibility groups being automated;
- outline BEACON updates to automate the two categorical eligibility groups;
- discuss the categorical eligibility determination of PA and NPA SNAP households;
- review the operation of the Federal Certify Indicator in categorical eligibility determination; and
- explain What If Calculator procedures for SNAP-Only Adult Services Adult Households.

**Definition of
Categorical
Eligibility
Groups**

The new categorically-eligible groups introduced in Field Operations Memo 2008-27 were:

SNAP-Only TANF Services Elderly/Disabled Household

This household is one where **all** members are elderly (age 60 or over) or disabled but do not receive SSI. This household is subject to the gross income test at 106 CMR 364.976 **solely** to determine categorical eligibility and the net income test at 106 CMR 364.970 to determine SNAP eligibility. Elderly and/or disabled households are never subject to a gross income test to determine SNAP eligibility, so the gross income test referenced in this paragraph is only for categorical eligibility determination.

Note: SNAP regulations promulgated to maximize categorical eligibility identified disabled persons as part of this group. See 106 CMR 365.180 (A)(5).

For SNAP purposes, an individual is considered to be disabled if that individual receives or is certified to receive:

- SSI or RSDI because they are determined disabled by the Social Security Administration (SSA);
- disability retirement from a government agency;
- federal veterans' benefits because of a service or non-service related disability;
- MassHealth as a disabled person;
- railroad retirement disability annuity; or
- benefits from one or more of the above-listed determination sources because of disability.

The individual is also disabled for SNAP purposes if (s)he is certified as federally-disabled by the State's Disability Evaluation Service (DES), and the expiration of such certification is not more than one year past due. For a more detailed list of requirements for meeting a federal disability standard, see 106 CMR 361.210.

SNAP-Only TANF Services Adult Household

This household is one where all members are adults between the ages of 19 and 59. The household is subject to the gross income test at 106 CMR 364.950 to determine categorical eligibility and the gross and net income tests at 106 CMR 364.950 and 106 CMR 364.970 to determine SNAP eligibility. A SNAP-Only TANF Services Adult Household will be denied if the household's income exceeds the gross income test at 106 CMR 364.950. The gross income test for SNAP eligibility is identical to the household's gross income test for categorical eligibility.

Note: An 18 year-old who does not reside with a parent, guardian or caretaker relative but who is the grantee of a SNAP household belongs in this categorical eligibility group.

**Automation of
Categorical
Eligibility
Groups in
BEACON**

Effective with BEACON Build 44.3, scheduled to be deployed on July 5, 2011, BEACON identified and automated categorical eligibility for SNAP-Only TANF Services Elderly/Disabled households and the SNAP-Only TANF Services Adult Household as follows:

1. The two newly automated categorical eligibility groups are identified in BEACON as *TANF Services FS AU* on the Cat Elig. Reason dropdown list of the AU Composition Results page. This designation already exists as the categorical eligibility label for the SNAP-Only TANF Services Family Household which includes:
 - a. a TAFDC household, a pregnant woman living alone; and
 - b. a household old with a child under 19 residing with a parent, a caretaker relative or an adult exercising parental control.

All TANF Services households must receive the *Help for Those in Need: A Resource Brochure* which confers a TANF program service and also meet their specific categorical eligibility income standard.

2. Categorically-eligible households are not subject to an asset test. Therefore, identical to the treatment of other categorically eligibility groups, the newly automated categorical eligibility groups will not be subject to an asset test in BEACON. BEACON will make a preliminary determination of categorical eligibility based on the AU Composition Results page. The Asset Q&A Navigator and the Asset pages will be available but will not require reedit when the household is determined to be categorically-eligible.

Note: For categorically eligible SNAP households with an associated cash case, the Assets Q&A Navigator and the Asset pages are required. Assets entered would be counted for the cash program, but disregarded for SNAP.

3. If during EBC results, the household is determined to be non-categorically eligible and the Asset Q&A Navigator questions were not completed, an edit indicating “*Assets data must be completed and selected before the request can be authorized. Please return to the Asset Q&A Navigator page*” will redirect the user to complete the Asset Q&A Navigator and the Assets pages.
 4. Categorically-eligible households, including the newly programmed households are always eligible for SNAP, no matter the amount of their income. A categorically eligible household, depending on income, will either be:
 - approved for a regular benefit amount;
 - approved for the minimum SNAP benefit of \$16 when the household size is one or two and the net income exceeds the standard for the household size; or
 - suspended at zero benefit when the household size is three or more and the net income exceeds the standard for the household size.
-

**Determining
Categorical
Eligibility for
PA and NPA
Households**

Categorical Eligibility Rules for Public Assistance (PA) Households

PA Determination:

There is no change to the PA SNAP categorical eligibility process at this time. To be considered a PA household, all SNAP household members must receive either TAFDC, EAEDC or SSI benefits or a combination of those benefits. A PA SNAP household has automatic categorical eligibility.

1. PA SNAP Categorical Eligibility Designation is *EAEDC/SSI FS AU* when:
 - all SNAP household members are receiving EAEDC;
 - all SNAP household members are receiving SSI; or
 - all SNAP household members are receiving either EAEDC *or* SSI.
2. PA SNAP Categorical Eligibility Designation is *TANF Services FS AU* when:
 - all SNAP household members are receiving TAFDC; or
 - at least one SNAP household member is receiving TAFDC and the others are receiving SSI or EAEDC.

Categorical Eligibility Rules for Non Public Assistance (NPA) Households

NPA Determination

The following rules apply to all NPA households, whether the household members are solely TANF Services households or a combination that include some public assistance (PA) members and some TANF Services (NPA) members.

TANF Service FS AU is the designation used in BEACON for all categorically eligible NPA households. The *TANF Service FS AU* designation has been expanded and now includes three TANF Services groups:

1. SNAP-Only TANF-Services Family Households (in use prior to this memo);
 2. SNAP-Only TANF-Services Elderly/Disabled Households defined on page 2 of this memo.
 3. SNAP-Only TANF-Services Adult Households, defined on page 2 of this memo.
-

**Determining
Categorical
Eligibility for
PA and NPA
Households
(Continued)**

To determine categorical eligibility for an NPA household BEACON will:

1. determine if the NPA SNAP household has an eligible member (including grantee) who is elderly (age 60 or greater). If yes, BEACON will apply the TANF Services Elderly/Disabled rules. If no,
2. determine if the NPA SNAP household has an eligible member (including grantee) who is federally disabled (including SSI). If yes, BEACON will apply the TANF Services Elderly/Disabled rules. If no,
3. determine if the NPA SNAP household has an eligible member who is a child under 19 residing with a parent, guardian or caretaker relative or the household is an eligible, solitary pregnant woman (grantee). If yes, BEACON will apply the TANF Services Family rules. If no,
4. determine if the NPA SNAP household has only adults between the ages of 19 and 59, or an 18 year old residing alone (grantee). If yes, BEACON will apply the TANF Services Adults rules.

Combination Categorical Eligibility Groups

When a SNAP household includes multiple PA or NPA categorically eligible household types, BEACON will use the most generous categorically eligible income standard to determine categorical eligibility for this combination household.

Example: A household that is applying for SNAP includes a 23 year old with no income, a 62 year old who receives RSDI, a 56 year old who receives EAEDC and a ten year old who receives TAFDC. This household is subject to the 200% gross income test which is the most generous standard for the different groups that make up this combination categorically eligible household.

**The Federal
Certify
Indicator**

The Federal Certify Indicator on the Disability page is an important component of categorical eligibility determination for disabled households, especially now that disabled individuals who do not receive SSI may also be categorically eligible if they meet the applicable gross income test.

If a disabled person is determined to be federally-disabled, therefore meeting the SNAP standard for disability, the case manager must ensure that the federal certify indicator is set to *Yes* on the Disability page. Non-SSI disabled persons may be receiving RSDI, a private pension, MassHealth or even no income at all. If the household does not include an elderly person (60 years or older), the federal certify indicator being set to *Yes* is the only way BEACON can identify the household as a disabled household. This is important to allow for both

**The Federal
Certify
Indicator
(Continued)**

categorical eligibility determination and the unique SNAP calculation rules that apply to a SNAP disabled household. This includes the waiving of the gross income test rule and the lifting of the shelter cap deduction for SNAP eligibility processing.

**The What If
Calculator**

When using the What If Calculator to calculate SNAP benefits for a SNAP-Only TANF Services Adult Household, case managers must not check the *Categorically eligible* box in the Food Stamps field.

If the *Categorically eligible* box is checked, BEACON What If will view this as a SNAP benefit calculation for one of the other TANF Services households which require the 200% of poverty tables and would use the incorrect standard. In an effort to ensure that a categorically eligible SNAP-Only TANF Services Adult Household is calculated correctly, **do not indicate that the household is categorically eligible when doing a What If calculation.**

**Obsolete
Memo**

This Operations Memo obsoletes Operations Memo 2011-33.

Questions

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