



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

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Commissioner

Operations Memo 2013-34
July 26, 2013

To: Department of Transitional Assistance Staff

From:  Lydia Conley, Deputy Assistant Commissioner for Policy,
Program and External Relations

Re: TAFDC, EAEDC and SNAP – Residency Requirements

Overview

Massachusetts residency is an eligibility requirement for applicants and clients (hereafter called clients) for TAFDC, EAEDC and SNAP. Continuous usage of benefits outside of Massachusetts may indicate that a client is no longer a resident.

New automated and Central Office processes will monitor the continuous out-of-state EBT usage of cash and SNAP benefits in an effort to determine if residency may be presumed to be abandoned.

Purpose of Memo

This Operations Memo:

- advises TAO staff of the new automated process for determining whether certain active clients have abandoned Massachusetts residency and actions that will result if residency has been abandoned;
 - reminds staff of residency requirements; and
 - outlines case manager responsibilities.
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Automated and Central Office Processes for Monitoring Out-of-State Usage

New automated and Central Office processes will monitor clients' out-of-state EBT usage. This applies to both point of sale (POS) transactions as well as ATM withdrawals. For monitoring purposes, BEACON will classify EBT transactions into three regions. They are as follows:

- In State – Massachusetts
- In Region – New England (Vermont, Rhode Island, New Hampshire, Connecticut, Maine) and New York
- Out of Region – All the remaining states

When an EBT transaction occurs out-of-state, BEACON will determine if the transaction occurred In or Out of the Region.

SNAP-Only Cases

SNAP-only cases identified with **In Region** transactions will appear on the 'Out of State EBT Card Usage' view for the Fraud Investigations and Data Match (FIDM) Unit to further investigate. This view will display the details of the card usage. The Match Specialist will send a Residency Verification notice (see Attachment A). The notice will have the return address of the FIDM Unit. If the client returns the residency verification to the FIDM Unit, the Match Specialist will disposition the match, and annotate the Narrative tab that residency has been verified. Once the match has been dispositioned, BEACON will stop monitoring the case until another out-of-state EBT transaction occurs.

If at any point during the monitoring period, the client makes an EBT purchase in Massachusetts, BEACON will stop monitoring the case until another out-of-state usage occurs. Any action taken by FIDM will be annotated on the Narrative tab. If verification of residency is received, FIDM will disposition the match. If Massachusetts residency has not been verified, the case will be closed and the client will receive a standard EBC closing notice for 'No Longer MA Resident.'

**Automated and
Central Office
Processes for
Monitoring Out-
of-State Usage
SNAP-Only Cases
(continued)**

SNAP-only cases identified as **Out of Region**, will appear on the FIDM Unit's 'Out of State EBT Usage' view after 75 days of consecutive out-of-region usage, and will be sent the Residency Verification notice (see Attachment A). The letter will have a return address of the FIDM Unit. If the client sends the residency verification to the FIDM Unit, the Match Specialist will disposition the match record, and annotate the Narrative tab that residency has been verified. Once the match has been dispositioned, BEACON will stop monitoring the case until another out-of-state EBT transaction occurs.

If the client fails to provide the requested proof of Massachusetts residency by day 90, then residency will be presumed to have been abandoned. A pending release request will be created to close the case on day 100 for "No longer MA resident." A closing notice and Narrative text will also be generated, and the match record automatically dispositioned. Once the match has been dispositioned, BEACON will stop monitoring the case until another out-of-state EBT transaction takes place.

**Automated and
Central Office
Processes for
Monitoring Out-
of-State Usage
Cash Only and
Cash-SNAP
Combination
Cases**

Cases (cash and cash/SNAP combo) identified with **In Region** transactions will appear on the 'Out of State EBT Card Usage' view for the FIDM Unit to further review. This view will display the details of the card usage. The Match Specialist will review and monitor the transactions and determine if they are consistent with the shopping patterns of clients residing in border cities and towns. If the FIDM Unit determines that residency is not questionable, they will disposition the match and annotate the Narrative tab. Once the match has been dispositioned, BEACON will stop monitoring the case until another out-of-state EBT transaction occurs.

If Massachusetts residency has been determined to have been abandoned, a pending release request will be created to close the case on day 70 for 'No longer MA resident,' a standard EBC closing notice for 'No Longer MA resident' and the action taken will be noted on the Narrative tab. The match record will automatically be dispositioned.

**Automated and
Central Office
Processes for
Monitoring Out-
of-State Usage
(continued)
Cash Only and
Cash-SNAP
Combination
Cases**

If at any point during the monitoring period, the client makes an EBT purchase in Massachusetts, BEACON will stop monitoring the case until another out-of-state EBT transaction occurs. Any action taken by FIDM will be noted on the Narrative tab.

Cases (cash and cash/SNAP combo) with **Out of Region** transactions will also be monitored. Those cases, whose benefits have been accessed exclusively via EBT, will appear on the FIDM Unit's 'Out of State EBT Usage' view. A pending release request will be created to close the case on day 70 for 'No longer MA resident,' a standard EBC closing notice will be issued for 'No Longer MA resident' and the action taken will be annotated on the Narrative tab. The match record will automatically be dispositioned.

Note: For the TAFDC and EAEDC programs clients may be temporarily absent for up to 60 days for certain pre-approved reasons. Case managers are reminded of the importance of entering approved reasons in the Temporary Absence page upon verification of the reason by the client. If a valid, current reason has been verified and entered in the Temporary Absence page, the case will *not* be closed.

**Case Manager
Responsibilities**

An 'Out-of-State EBT Card Usage' match has been added to the Match History tab. Case managers must not close a case due to out-of-state EBT usage.

If a client returns verification of residency to their TAO, case managers must disposition the Out-of-State EBT Card Usage match, and annotate the Narrative tab, to prevent the closing process from being initiated. If the closing process has been initiated, and the client has verified residency, then the case manager must disposition the match in addition to removing the pending closing action.

Reminder: If a client's case is closed or pending to close as a result of this automation, residency must be established before a case may be reopened, if otherwise eligible.

**Case Manager
Responsibilities
(continued)**

Staff are reminded that there is no, one, specific verification that must be provided to verify residency. However, if information regarding residency appears questionable or contradictory, secondary verification must be requested and provided before taking action to reopen the case or remove the closing.

Referrals should be made to the FIDM Unit for further investigation when a case involves inconsistent or contradictory information concerning current eligibility, which cannot be resolved through collateral contact or additional verifications. A Referral check box is available from the AU Details page. See Operations Memo 2013-5 for more information on this feature.

If residency has been verified as abandoned, the FIDM Unit will determine any overpayments and pursue recoupment of benefits as appropriate.

Staff are also reminded to advise clients who are no longer Massachusetts residents that they can reapply for benefits in the state in which they are residing.

The U.S. Department of Agriculture maintains a list of phone numbers for all states where the public, applicants and participants can access information on SNAP benefits. See http://www.fns.usda.gov/snap/contact_info/hotlines.htm

The U.S. Department of Health and Human Services maintains a web page with contact information for state Temporary Assistance for Needy Families (TANF) programs. See <http://www.acf.hhs.gov/programs/ofa/help>.

**Policy
References**

For TAFDC see: 106 CMR 203.650, 203.660.
For EAEDC see: 106 CMR 320.530, 320.550.
For SNAP see: 106 CMR 361.610 (H), 362.100, 362.110, 362.120.

Questions

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

600 Washington St.
Boston, MA 02119

Important Notice - Read Carefully [9999]
Este Mensaje Es Importante – Lea Cuidadosamente

Massachusetts Department of Transitional Assistance

Mary Jones
101 Main Street
Lawrence, MA 01840
07/08/2013

Agency ID: 9999999
Central Office - DTA

Residency Verification Notice

Dear Mary Jones,

Below is the list of verifications you need to give us in order to determine if you can continue to receive assistance. **You must submit these verifications to John Smith by 7/18/2013.** If you do not give the required verifications, your case may be closed.

You can drop off, mail, or fax your verifications to John Smith. Please include your name and the last four digits of your Social Security Number (if provided) on every page of the documents you submit.

Need Help? If you have any questions or are having problems getting a verification, please call John Smith at 617-999-9999 as soon as possible.

Residency Verification

What You Need to Prove	Examples of Proofs You May Provide
<p>Massachusetts Residency</p> <p>For Whom: Mary Jones</p> <p><i>Our records indicate that you have been using your benefits in Iowa during the past several months. You need to provide us with verification that you still reside in Massachusetts. You must provide this verification within 10 days of receiving this notice or your case will be closed.</i></p> <p><i>If you are no longer a Massachusetts resident, you may apply for benefits in the state in which you reside.</i></p>	<p>Current rent receipt, current utility bills, current mortgage statement, current school enrollment verification of children or other acceptable verification of residency.</p>

John Smith
Phone: 617-999-9999
Fax: 617-999-9999