



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

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**Operations Memo 2013-39A
July 26, 2013**

To: Department of Transitional Assistance Staff

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

Re: External Data Match: Food and Nutrition Service (FNS) electronic Disqualified Recipient System (eDRS)

Overview

In a continuing effort to improve program integrity and reduce the possibility of payment error, the Department will begin using the Food and Nutrition Service (FNS) electronic Disqualified Recipient System (eDRS). eDRS is a national internet-based system developed and administered by FNS that contains records of SNAP clients who have been disqualified in each state for Intentional Program Violations (IPVs). Individual states are responsible for adding, modifying and removing records from the system.

Purpose of Memo The purpose of the memo is to:

- advise TAO staff of the eDRS database match now available to the Department;
 - explain the role of the Fraud Investigation and Data Match (FIDM) unit in the processing of these cases;
 - explain case manager responsibilities when processing cases containing disqualified individuals; and
 - advise staff of the availability of two new actuate reports.
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**eDRS Match
FIDM and Case
Manager
Responsibilities**

If a SNAP household contains a disqualified individual, that individual is ineligible for benefits. The household is considered to be non-categorically eligible and an asset limit is applied to the household. The assets and income of the disqualified individual will count in the benefit calculation for the household (see 106 CMR 365.520, Disqualified Non-household Members). The duration of ineligibility, for the disqualified individual, is based upon the type of violation and the level of the disqualification (see 106 CMR 367.800, Disqualification Penalties).

The Social Security Number (SSN) of any household member with the status of active, pending or ineligible in a SNAP case will be matched with eDRS on a daily basis.

**FIDM
Responsibilities**

When a case manager completes the Apply for Assistance page, in the Request for Assistance workflow, if there is an eDRS match, a pop-up warning will indicate that a household member(s) has an IPV, and the warning will display the dates of the disqualification and the disqualification level. However, this match is not considered to be verified upon receipt and will require a FIDM investigation of the claim. A daily report, generated by BEACON, will be sent to the FIDM whenever a match occurs in BEACON. The FIDM unit will be responsible for obtaining copies of the disqualification documents by contacting the eDRS officials in the state where the disqualification occurred. The FIDM will make every attempt to resolve the matter as soon as possible, but the process relies on the responsiveness of the other state and may not be resolved in a timely manner.

**Case Manager
Responsibilities**

While the investigation is ongoing, benefits cannot be withheld or denied, if the household is otherwise eligible. The case manager must continue to process the case. When conducting the interview, the case manager must ask the client if he or she is aware that a member(s) of the household has a disqualification.

If the client is aware of the disqualification and all members of the applying household are currently disqualified, the case manager must explain the following two options to the client:

- explain that since all the household members have a current SNAP disqualification, no one in the household will be eligible for benefits and that the client has the option to withdraw the application and reapply when the disqualification ends; or
 - explain that the case can be processed without the disqualification and, if the household is otherwise eligible, they will receive benefits. If the disqualification is determined to be valid any overpayment of benefits will be recouped.
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**eDRS Match
Case Manager
Responsibilities
(continued)**

Important: If the client can supply documentation of the disqualification, the case can be processed without the delay an investigation would create. Any documentation received must be faxed to the FIDM for processing of the disqualification in BEACON.

If the client responds that:

- he or she is not aware of the disqualification;
- he or she is aware of the disqualification but the household contains members who would otherwise be eligible; or
- he or she is aware of the disqualification but would like the application to be processed regardless of the disqualification,

the case manager must process the case as follows:

- Explain to the client that the case will be processed with the disqualified member's information, as if the disqualification does not exist, and if the household meets the eligibility requirements of the program benefits will be issued.
- Explain that, if it is later determined by the FIDM unit that the disqualification is valid, the household will be subject to an asset limit. The disqualified client's income and assets will count in the benefit calculation for the rest of the household and the disqualified individual(s) will not receive benefits.
- Explain that if the disqualification is valid, the benefits the household has received will be recalculated and, if the remaining household members are still eligible for benefits they will receive the recalculated SNAP amount. Any overpayment of benefits will be recouped whether the household is eligible or not.

Recoupment and overpayment referral will be completed by the FIDM unit. The Narrative will be updated with the action taken. No further case manager action will be required.

Clients are notified automatically by mail when a disqualification period is completed, and it is the client's responsibility to contact the case manager for reinstatement of benefits.

Note: The eDRS match data is available to field staff in the ECF/Match History Tab.

Actuate Reports Two new Actuate reports will be generated monthly from activity on the FNS eDRS match:

- the FNS eDRS Match Summary Report; and
- the FNS eDRS Match Detail Report.

The Summary Report will be placed in the Matches/Managers/Supervisors folder. The Detail Report will be placed in the Matches/Detail folder.

Obsolete Memo This Operations Memo obsoletes Operations Memo 2013-39: External Agency Match: Food and Nutrition Service (FNS) electronic Disqualified Recipient System.

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