Operations Memo 2014-12A
October 10, 2014

To: **Department of Transitional Assistance Staff**

From: **Anne O'Sullivan, Assistant Commissioner for Policy, Program and External Relations**

Re: **TAFDC, EAEDC and SNAP – Failure to Verify Social Security Administration (SSA) Data**

Overview

To comply with program rules, a Social Security Number (SSN) must be provided either orally or in writing for each applicant or client (hereafter called client) applying for or receiving TAFDC, EAEDC and/or SNAP, unless good cause exists, in accordance with 106 CMR 701.230(C) and 362.500(C). An overnight batch process using the State Verification Exchange System (SVES) with the Social Security Administration (SSA) is used to validate the SSN.

Clients with temporarily assigned numbers in the SSN field are processed through a monthly batch process using the Enumeration Verification System (EVS) with SSA.

If a client fails to provide, or verify, mandatory verifications as matched with or obtained from SSA, the case must be closed for failure to provide verifications.

Operations Memo 2014-12, now obsolete, described procedures and DTA staff responsibility for closing a case when a client failed to provide or verify SSA-matched data. This Operations Memo is being reissued because, as a result of the implementation of the Program Integrity (PI) checklist in Build 46.3, this process has become largely automated.

Purpose of Operations Memo	The purpose of this reissued Operations Memo is:

- to advise staff of the changes to the SSN Match process as a result of implementation of the PI checklist functionality in BEACON;

- to describe the automated SSN Verification Match and automated closing process;

- to clarify case manager and FIDM responsibilities;

- to provide examples of case scenarios; and

- to explain how to close cases on BEACON for failure to verify SSA-matched data.

Obsolete Operations Memo	Operations Memo is 2014-12: *TAFDC, EAEDC and SNAP – Failure to Verify Social Security Administration (SSA) Data* is now obsolete.

Automated SSN Verification Match Process	As a condition of eligibility, clients must provide an SSN or proof of application for an SSN, unless good cause exists, along with all other required financial and non-financial eligibility factors. This applies to all household members.

The SSN Verification Match is run nightly with SSA using SVES to validate the Social Security number entered in BEACON. The data elements matched with SSA are:

- DOB;

- SSN; and

- Name.

This match **is** considered verified upon receipt and can be acted upon at any time during a household's certification period. If the data in BEACON matches the information provided by SSA, the SSN is considered verified.

When SSA data is matched to a household member in an active, pending or ineligible status and is discrepant with the demographic data on BEACON:

- the data will appear as a pending item on the Program Integrity (PI) Checklist and can be accessed through the **Detail** icon on the PI Checklist, through the Match History tab and under the case manager's External Agency Matches view; and

- an *SSA Verification Notice* is automatically generated and sent to the head of household to request verification.

Automated SSN Verification Match Process: (continued)

The information requested by the *SSA Verification Notice* will vary based on the discrepancy type. When the discrepancy is:

- *DOB is Different*, the Beacon generated *SSA Verification Notice* will request "Proof of date of birth";

- *Listed Under Another Name*, the Beacon generated *SSA Verification Notice* will request "Proof of the legal name, any alternate name(s) and social security number";

- *Unknown to SSA* or *Does Not Match with SSA*, the Beacon generated *SSA Verification Notice* will request "Proof of social security number; Proof of application or pending application for social security number; or ineligibility for a social security number."

Case Manager Responsibilities

If the case manager is advised of an outstanding SSN verification match via a PI checklist popup message in BEACON or if contacted by the client regarding the *SSA Verification Notice,* the case manager should attempt to resolve the discrepancy by reviewing the SSN Verification Matches and the case record to resolve possible data entry errors. If there does not appear to be any BEACON data entry errors, the client should be advised of the verification needed to resolve the match, the due date of submission of the verification, and offered assistance in obtaining verification if needed. **Do not issue a second *SSA Verification Notice* or VC-*1* for information that has already been requested.**

If the client provides the required verification, the case manager must process the verification, take appropriate case action in accordance with existing policy and procedures and disposition the match via the appropriate page of the Match History tab.

If the client fails to provide verification by the date due on the *SSA Verification Notice*, BEACON will automatically close the case for failure to provide verifications and the Narrative tab will be annotated with the action taken.

The match must not be dispositioned by the case manager until verification is received. Matches that have been resolved through a batch process will be automatically dispositioned and will not require case manager action.

An Accounts Receivable (AR) (overpayment) referral must be made anytime an overpayment has occurred in accordance with existing policy and procedures. A fraud referral must be created if the case manager suspects fraud.

Examples: <u>**Example 1**</u>: Catherine Ward is a client who has been receiving EAEDC and SNAP benefits. A match is returned from SSA with a discrepancy type of *DOB is Different.* After receiving an *SSA Verification Notice* requesting "Proof of date of birth," the client contacts her case manager. She reports that her date of birth is 05/01/1974. The case manager reviews the case record, which contains a copy of Ms. Ward's birth certificate, and determines that her date of birth had been incorrectly entered in BEACON as 05/01/1947. The client's date of birth must be corrected in the assessed person page in BEACON and the match must be dispositioned via the appropriate page of the Match History tab. In this situation, the client is not required to provide any additional verification of her date of birth.

       <u>**Example 2:**</u> Kimberly Ashley Dias is a SNAP client. A match is returned from SSA with a discrepancy type of "*Listed Under Another Name*." BEACON data reflects that the client's only known name is Kimberly Ashley Dias. An *SSA Verification Notice* is automatically generated and sent to the grantee requesting "Proof of the legal name, any alternate names and social security number". The client fails to provide verifications by the due date on the *SSA Verification Notice*. BEACON automatically closes the case for failure to provide verifications and the Narrative tab is annotated with the action taken. The match is not dispositioned.

In the case of Example 2, verification that the client legally changed her name from Kimberly Ashley Dias to Kimberly Ashley Martins and that she has updated this information with SSA is received within 30 days of the closing. The case manager must reinstate the case, update the client's name on the Assessed Person page, listing Martins as the client's current last name and Kimberly Ashley Dias as an alternate name, and disposition the match via the appropriate page of the Match History tab.

When the case is wrapped-up, the benefit effective date must be set to:

- the date that the verification was received if the verification was received after the effective case closing date, or

- the start of the AU's cyclical month if verification was received before the effective case closing date

See Operations Memo 2014-30 for additional information about the proration of benefits.

Important: The Department utilizes the name on file with SSA as the Primary name and can only change the Primary name if and when it is updated by SSA.

Case Closing Situations:
FIDM Responsibilities

As outlined in Operations Memo 2013-7, the Fraud Investigation Data Match (FIDM) Unit receives matches from SSA for identified clients with temporarily assigned numbers in the Social Security number (SSN) field, but for whom the EVS process has provided data elements that are unknown to BEACON and require review.

FIDM Unit staff must review case information on BEACON and issue a BEACON-generated Verification Checklist (VC-1) giving the client ten days to verify the SSN. A User Created verification must be created selecting Other from the Item drop down menu. Only the following language must be used for the Other and Value fields on the VC-1: "Proof of social security number."

If the client does not verify the discrepant information listed on the VC-1, the case must be closed for failure to provide verifications. This applies to all household members, whether or not they are in receipt of benefits.

Closing A Case

When the Department has received information from SSA contrary to what a client has provided and the client subsequently fails to verify the information (including the SSN of any household member(s)), the entire case must be closed as follows:

- on the AU Composition Results page, select the case to be closed;

- select Noncooperation from the Reason Category drop-down box;

- select Failure to submit the required verifications from the Reason drop-down box;

- click Save; and

- proceed to authorize the case according to existing procedures. The client will receive a standard closing letter.

Example:　At application, Mary Smith states she does not have an SSN and reports that she is ineligible for one due to her immigration status. She is the grantee and her case is established and approved with a temporary identification number in the SSN field. A month later, the FIDM Unit receives a match from SSA of "*Does Not Match with SSA*" for Mary Smith. The match indicates Mary may have an SSN. The FIDM Unit sends Mary a VC-1 requesting proof of SSN following established procedures. Mary does not provide verification within the required 10 days. The FIDM Unit initiates a closing action on the case for failure to provide required verifications.

Reminder:
Confidentiality of Personal Information

Employees of the Department are privy to certain information of a personal, private, and confidential nature. Department policy prohibits all staff from **accessing** or **disclosing** such information, including client information, unless authorized to do so. Client information may be accessed only for the purpose of performing a specific work-related assignment. (See Legal Memorandum *Confidentiality of Personal Information* issued April 25, 2013, on DTA Online under Administrative Memos, for more information.)

Card Issuance and Client Notification

Additionally, staff are reminded that grantees will receive an automated notice when they or any member of the case has a change in the SSN field. If the last digit in the grantee's SSN field has changed, the notice will include his or her new benefit date(s) and, if benefits are received by EBT, it will also include language informing the client:

- of the issuance of a new EBT card and expected date of receipt;

- of the activation of the new EBT card for the next cyclical benefit issuance;

- that the current EBT card will be valid until the next cyclical benefit issuance; and

- that the remaining balance on the current EBT card will be transferred to the new EBT card on their next cyclical benefit date.

This process applies to both systems and manual updates of the SSN field. Details of this process, the applicable notices, and case manager responsibilities are outlined in Operations Memo 2013-7. Staff are reminded of the importance of monitoring the Enumeration Process (SSA) SSN Changes view as an SSN change may require that a case status be changed from exempt to nonexempt, to be subject to the TAFDC Work Program Requirements, the lower Need and Payment standards; and time limited benefits. Additional verifications, such as immigration status, may need to be requested.

Policy References

TCAP – 106 CMR 702.300 through 702.340.
TCAP – 106 CMR 701.230.
SNAP – 106 CMR 361.600 through 361.660.
SNAP – 106 CMR 362.500.

Questions

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