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### **Quality Corner**

"Error" can be an ambiguous term if you don't know what constitutes as a SNAP error and why it is relevant beyond the immediate impact of a SNAP household's benefit amount. This month, Quality Corner will review the Active Error Rate and the Case and Procedural Error Rate (also known as the negative error rate). This QC Corner defines both types of errors and advises case managers on how to prevent errors.

#### Active Errors

The Payment Accuracy Rate is measured by the amount of SNAP benefits that were either underissued or overissued to a household. These incorrect benefit amounts are known as active errors. Active errors occur when benefits are issued to ineligible households, when benefits are issued to eligible households but are in excess of what program rules direct, and when eligible households receive a lower benefit amount than program rules direct. Active errors can be caused by the SNAP recipient, the agency, or systems. The most common recipient errors are unreported or untimely reported income or expense changes. When an error is caused by the agency, this means that the income, deductions, or household composition has been entered incorrectly. The most common active errors caused by the agency are related to earned income (wages and salaries), deductions, unearned income and household composition. The most recent month reviewed by QC was January 2016; the Payment Accuracy Rate was 8.59%.

States are subject to fiscal penalties and must implement a correction plan if their active error rates are persistently above the national average which is 6%. These monetary penalties directly impact the funds available to the department.

**Note:** Overpayments and underpayments are weighed the same in the calculation of the Payment Accuracy Rate. An overpayment is counted in the active error rate whether or not the overpaid benefits are recouped from households.

#### **Case and Procedural Errors (CAPERs)**

The CAPER is measured by the accuracy of actions taken to deny, suspend, or terminate SNAP benefits and the accuracy of notifications issued regarding these determinations. These are actions that resulted in a household being improperly denied, suspended, terminated, or incorrectly notified. There are several factors that can contribute to the CAPER. The most common contributing factors are: misapplication of policy, systems-related problems, untimeliness in processing initial applications, early or invalid denials, failure to send notices such as NOMIs, VC-Is, or Notice of Adverse Action (NOAA), incorrect information on notices, or unclear notices.

SNAP Quality Control (QC) calculates the CAPER by selecting a random sample of cases every month. These cases are reviewed to determine if negative errors occurred. The CAPER is then calculated by dividing the number of cases with negative errors by the total number of cases reviewed by QC that month. The CAPER for January 2016 was 21.43%.

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### Quality Corner (Continued from Page 2)

#### What's a Case Manager to Do?

It is important for staff to be vigilant when processing cases. When unsure about policy or procedure, defer to the tools that have been made available to case managers such as the Online Guide, Job Aids, Webinars, and DTA Procedural Mailbox. In addition, listed below are practices that case managers can implement on a daily basis to ensure program accuracy:

- 1. Utilize the resources and tools in Policy Online. These resources help ensure the correct application of policy and procedures.
- 2. Enter a clear and concise narrative at application, recertification and also for specific case maintenance activities. A narrative entry helps the subsequent worker or supervisor to know what actions were taken on the case and items of note for the future of the case.
- 3. Be aware of the common factors that have contributed to active errors and the CAPER in your office and state-wide, analyzing all data available to determine the root causes of invalid actions identified through QC and other sources.
- 4. Regardless of the action assigned to you for each case, always check EDMC for any available verifications for each household member (not just the Grantee) to ensure that submitted verifications are acted upon timely.
- 5. When creating a Request for Assistance using a scanned SNAP Application, always use the date the SNAP Application was submitted to DTA Document Processing Center (DPC) and not the date the action was created.
- 6. To prevent invalid denials for verifications that are not mandatory, utilize external databases when possible and ensure that the documentation requested is required by program rules.
- 7. Review the Financial break-down at the Interview Wrap-Up window prior to authorization to ensure all income, expenses, and AU members are correctly identified.
- 8. Pay attention to error-prone cases, such as those with self-employment and rental income, to ensure that the cost of doing business is correctly calculated.
- 9. When you encounter a systems-related error, submit the case to your supervisor or management staff for a ticket to be submitted. This aids in properly identifying the root causes of errors so modifications can be made to prevent similar systems-related problems.

# From the DTA Policy Procedure Mailbox

If you have any questions on this column or other policy and procedural material, please have your manager or supervisor email the **DTA Mailbox.** 

- **Q. I.** A father and his daughter are receiving TAFDC. The daughter is turning 18 this month. During the reevaluation, the father mentioned and verified that his daughter is scheduled to graduate high school after first attending summer school and then completing the upcoming fall term. During the reevaluation interview, the father also mentioned that his daughter has a part-time summer job. Do I count the daughter's earnings from this job for TAFDC?
- A. I. No. The wages earned by a full-time high school student are not counted in determining TAFDC eligibility. For more information, refer to 106 CMR 204.260. Additionally, these wages are not counted in determining the assistance unit's TAFDC grant amount. For more information, refer to 106 CMR 204.500.
- Q. 2. Do the wages of the student described in Q. I.impact this household's SNAP benefit amount?
- A. 2. Yes. Once the child turns 18, her earnings are countable for SNAP purposes. As a SNAP household member who is turning 18 years old, the daughter's earnings are no longer excluded. For more information, refer to 106 CMR 363.230(H).
- **Q.3.** Is the student described in **Q.1.** still exempt from the ABAWD work program requirement once she turns 18 years of age?
- A. 3. Yes. Once this individual turns 18, she remains exempt but since she is no longer meeting the TAFDC requirement, she has a new SNAP exemption reason. Her new exemption reason is "Student at least Half-time." For more information, refer to the Online Guide, SNAP book, Work Requirements chapter, ABAWD Work Program Requirement subchapter, ABAWD Work Program Exemptions page. "Meets TAFDC/EAEDC requirement." For more information, refer to the Online Guide, SNAP book, Work Requirements chapter, ABAWD Work Requirements chapter, ABAWD Work Program Requirement." For more information, refer to the Online Guide, SNAP book, Work Requirements chapter, ABAWD Work Program Exemptions page. "Meets TAFDC/EAEDC requirement." For more information, refer to the Online Guide, SNAP book, Work Requirements chapter, ABAWD Work Program Requirement subchapter, ABAWD Work Program Exemptions page.

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### From the DTA Policy Procedure Mailbox (Continued from Page 4)

- Q. 4. A SNAP client reported that since the summer has started, her 19-year-old son has temporarily moved home, and expects to return to college in the fall. Her son is a full-time student during the school year and had not been working but now intends to work 10 hours a week over the summer. Can I exclude this son's earnings?
- A. 4. Yes. This student is considered an ineligible student and nonhousehold member who does not meet the student eligibility requirements during the school year. For this reason, his income is excluded. For more information on the income of nonhousehold members, refer to 106 CMR 361.230. Although this student is not currently attending classes during the summer or winter breaks, he is considered continuously enrolled during periods of vacation or recess, until he graduates or ends enrollment. For more information on continuous enrollment, refer to 106 CMR 362.420. (For more information on how to qualify as an eligible student for SNAP benefits, refer to 106 CMR 362.410.)
- **Q. 5.** If the student described in **Q.4.** increased his hours from 10 to 20 hours per week, would I begin to count his earnings?
- **A. 5.** Yes. Once the son is working at least 20 hours per week, he begins meeting the student eligibility requirements and therefore joins his mother's SNAP household and his earnings are countable.

### **Online Guide Transmittals**

### Cross Programs – Revision to Voter Registration Option ("Declination") Form

Online Guide Transmittal Update 2016-25 Cross Program

The Voter Registration Option ("Declination") Form has been revised. It is now known as the Voter Preference Form. The Voter Preference Form must be included in the Voter Registration packet provided to clients when they apply, recertify, are reevaluated, or change their address. There are no substantive changes to any procedures regarding a client's right to register to vote or how to inform clients of their voter registration rights.

In addition, the Voter Registration landing page of Policy Online has the following changes:

- the Secretary of State's Voter Registration Workbook for Agencies has been revised; and
- a link to the Online Guide has been added to the Procedures section.

### **TAFDC – Teen Parent Eligibility Reason Change**

Online Guide Transmittal Update 2016-27 TAFDC

BEACON Release 48.4, scheduled for June 27, 2016 will update functionality based on Field requests. The purpose of the Online Guide Update is to inform DTA staff about changes to BEACON functionality:

• a teen parent who is eligible as a pregnant client with no other dependent children will have a new Required status reason on the Work Requirements TAFDC page: Teen Parent - Pregnant.

### TAFDC – Self-Sufficiency Specialist (SSS) Narrative Tab Icon

Online Guide Transmittal Update 2016-28 TAFDC

BEACON Release 48.4, scheduled for June 27, 2016 will update functionality based on Field requests.

The purpose of the Online Guide Update is to inform DTA staff about changes to BEACON functionality:

- If an SSS makes an entry in the Narrative tab, the Narrative will be marked with a yellow circle icon with an SSS in the circle; and
- Prior to using the AU Reassignment Recommendation page on BEACON, case managers must enter a detailed explanation on the Narrative tab regarding why the case should be reassigned.
  - **Example:** Mary Jones is a mother of two children age 3 and 6. In addition to not having her HiSET certificate, she is also homeless. For this reason, I believe Mary would be an excellent candidate for the SSS.

#### **Online Guide Transmittals**

## **TAFDC – Pathways to Self Sufficiency**

Online Guide Transmittal Update 2016-29 TAFDC

One of the Department's goals is to assist all clients in moving toward economic self-sufficiency and an improved quality of life. For TAFDC work program required clients as well as clients who wish to volunteer to participate in an ESP activity, Pathways to Self-Sufficiency (PSS) is the catalyst for reaching that goal. It is the tool that will help us assess the client's challenges and strengths allowing us to refer them to appropriate supports and services.

PSS is intended to:

- maximize meaningful client and case manager engagement
- minimize unnecessary appointments and disruptions to client schedules
- promote personal responsibility and work; and
- increase access for clients and efficiency for DTA staff with automation wherever possible.

The goal of Pathways to Self-Sufficiency is client outcomes that lead to appropriate job placements, employment supports and economic self-sufficiency.

The Online Guide update advises DTA staff about:

- advise DTA staff about PSS;
- provide procedures to follow when processing applicants and clients subject to PSS; and
- advise DTA staff about BEACON changes associated with PSS.

# **Online Guide Transmittals**

# TAFDC, EAEDC and SNAP – Policy Reminder: Language Access

Online Guide Transmittal Update 2016-32 TAFDC, EAEDC and SNAP

This Online Guide transmittal serves as a reminder about DTA's responsibility to provide interpreters at no cost to clients with Limited English Proficiency (LEP) to conduct Department business. All DTA staff who interact with the public must advise clients of the right to interpreter services and must provide any needed interpreter services to those whose primary language is not English.

Interpreter services must be offered to clients with LEP during all face-to-face and telephonic interactions.

### **Cross Programs – DTA Assistance Line Enhancements**

Online Guide Transmittal Update 2016-34 Cross Programs

This Transmittal advises staff of enhanced functionalities to the DTA Assistance Line.

#### Customer Survey:

All callers that connect to a case manager in the DTA Assistance Line have the option to complete a customer service survey at the end of their call. Participation is voluntary and does not influence eligibility or benefit level. All responses provided in the customer service survey are anonymous.

**Important**: Case managers must disconnect from the call once the client's questions and concerns are resolved. Once the case manager disconnects, the client will be given the customer service survey.

#### Address Change:

Clients who call the DTA Assistance Line will have the ability to report a change of address via text message. Clients who elect to use this option will be prompted to provide a telephone number that accepts text messages. Instructions will be sent to the cell phone number provided while the client stays connected to the DTA Assistance Line. Clients will be informed when their reported changes are received.

#### State Letter

#### **Rescission of Emergency Assistance Regulations**

State Letter 1370 EA

This State Letter transmits the following changes to the Emergency Assistance regulations:

The Department is rescinding its Emergency Assistance (EA) regulations at 106 CMR 309, as the Department of Housing and Community Development (DHCD) has promulgated regulations governing the EA program, which can be found at 760 CMR 67.

This material is effective June 17, 2016.

### From the Forms File

#### **Revised Form**

18-083-0616-05 LL/VER (Rev. 6/2015) Landlord Verification Form

The revision to the *Landlord Verification Form* (LL/VER) added a field to record people who are related to the grantee or his/her children who live at the address. Please discard old versions of the LL/VER and use the revised version.

#### **Revised Flyer**

Gain on-the-job experience as a DTA Works Intern! 26-440-0616-05 26-441-0616-05 (S) DTA Works Flyer

The Gain on-the-job experience as a DTA Works Intern! flyer describes to clients the DTA Works Internship Program that is available to TAFDC clients has now been revised. Please discard old versions of this flyer and distribute the revised flyer.

#### **Revised Poster**

Gain on-the-job experience as a DTA Works Intern! 26-430-0616-05 26-431-0616-05 (S) DTA Works Poster

The Gain on-the-job experience as a DTA Works Intern! poster describes to clients the DTA Works Internship Program that is available to TAFDC clients has now been revised. Please discard old versions of this poster and display the revised poster in the TAO waiting area.

#### **Obsolete Form**

02-660-1014-05 02-661-1014-05 (S) TAFDC- Transition Plan

#### **Diversity Quote**

The whole idea of a stereotype is to simplify. Instead of going through the problem of all this great diversity - that it's this or maybe that - you have just one large statement; it is this.

Chinua Achebe

Believing you can.

#### FYI

### Participation and Attendance Form Data Entry Online Guide

The Participation and Attendance forms, the ESP Participation and Attendance Record (ESP-7 A) and the Participation and Attendance Record for Employment Ready Activities (ESP-7 B), as well as other appropriate participation forms, are sent to clients the first business day of the week, usually a Monday unless Monday is a holiday, before the last Saturday of the month. The participation forms must be returned by the client no later than the 10th of the following month, or the first business day after the 10th of the month if the 10th is on a weekend or holiday.

To prevent a participation sanction from being created, case managers must enter the forms on the Monitor Participation page no later than the 18th of that month, or the first business day after that date if the 18th is on a weekend or holiday. Routinely, case managers should enter the participation month's returned forms by the Friday before the last Saturday of the current month.

An updated Participation and Attendance Form Data Entry Online Guide which lists the last Friday dates that ESP-7 forms should be entered on the Monitor Participation page for the previous month's participation, can be found at:

http://dtaonline.es.govt.state.ma.us/refrence/curpol/guides/tafdc\_attendance\_guide/ tafdc\_participation\_attendance\_guide.pdf

Participation forms not entered by the appropriate Friday entry date can be entered retroactively up to 6 months prior to the current participation month. Procedures for entering prior months' participation forms can be found in the Prior Month Processing page in the Monitoring Work Program and ESP Participation chapter of the Program Nonfinancial Requirements book in the TAFDC topic section of the Online Guide.

# **TAO Meeting Notes**