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

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Online Guide Transmittal 2020-27C
April 13, 2020

To: **Department of Transitional Assistance Staff**

From: **Sarah Stuart, Associate Commissioner for Change Management**

Re: **Cross Programs: Temporary Emergency Operations Due to COVID-19**

Overview

On March 10, 2020 a State of Emergency was declared by Governor Baker to support the Commonwealth's response to the novel coronavirus disease (COVID-19).

DTA is taking steps to ensure that active clients do not experience a disruption in benefits and prioritizes new applications. Initial procedures were issued on March 18th and have been revised to reflect clarifications and continued enhancements.

Purpose

The purpose of this Online Guide Transmittal is to advise staff of temporary adjustments due to COVID-19. These changes include:

- procedural changes;
- prioritization of certain case work;
- systems enhancements;
- modified front-end services; and
- changes to staff schedules.

Procedural Changes

Work related to pending SNAP, TAFDC and EAEDC applications are the priority. Due to these extraordinary circumstances, certain procedures are being temporarily revised to streamline and expedite the processing of cases. All staff are to adhere to the following modified procedures until further notice:

Appointments & Cold Calls

- Clients wishing to apply for cash assistance are to contact the local office directly to initiate a telephonic application or to make the request online at DTAConnect.com. TAFDC and EAEDC applications initiated through telephone contact and for which no online request was made must have the application packet mailed with a VC-1. Those initiated online must not have the packet mailed for signature.

- Only appointments for telephonic application interviews are to scheduled. **A series of 3 cold calls must be made prior to scheduling an appointment**. No other appointments are to be scheduled.

Important: An interview for a SNAP application is only to be scheduled if mandatory verifications are outstanding per OLGT 2020-29. If you have a client applying for any program without a phone number, with an in-office ADA accommodation, or with HLS please contact the Ombuds office.

Verifications

After reviewing verified upon receipt data sources, cases with outstanding verifications must have a series of three cold calls attempted in order to expedite eligibility determination.

Verbal self-declarations are to be accepted for all SNAP eligibility factors with the exception of Identity of the grantee. Identity must be verified for all grantees. A SVES must be run for all grantees who are new and unknown to the DTA, or if there is significantly contradictory information.

For TAFDC and EAEDC Identity must be verified for the grantee and relationship for household members. A SVES must be run for all grantees who are new and unknown to the DTA, or if there is significantly contradictory information. For other eligibility factors, when traditional verifications are not available to the client and collateral contact is unsuccessful, written self-declarations are to be accepted. A verbal self-declaration can be accepted for bank accounts, other assets and housing type but must be followed up with a VC-1 and a reminder set to check the case for the verification in 60 days.

Verified upon receipt data sources must be used in eligibility determination. Data sources that are considered to be a trusted source are to be used only if they corroborate a client's statement.

Verification (cont.)

Example 1: A client declares that they are receiving $800 per month in disability benefits. A review of SVES shows that they are receiving $834 per month. Because this is considered verified upon receipt the $834 per month must be used.

Example 2: A client states that they are working and have wages totaling $400 per week (either verbally or in writing/on an applications). Their employer is listed on The Work Number and shows $625 per week. Because the information in The Work Number corroborates that the client is in fact employed, the wages from the Work Number must be used as it is a trusted source. The client must be informed that they can submit alternative verification if they disagree with the amount showing on The Work Number.

Example 3: A client or their application states that they are not working but there is data in The Work Number. The client's statement or information declared on the application is to be taken and the information in Work Number marked as a Terminated Source. Any previous earned income on BEACON must be ended.

Terminated Income

Proof of terminated income must not be requested. This applies to both earned and unearned income. A verbal or written self-declaration may be provided as verification of terminated income for all programs.

If a client reports verbally or in writing that an income source has been terminated it must be ended on BEACON. If a client reports that they are not terminated, but currently have no hours/pay the income source is to "zero-ed out." If it is unclear whether or not they are still employed, and cold call attempts are unsuccessful, the source is to be ended in BEACON.

Required Forms

Required Department forms such Absent Parent Information Form or the AP-SSI-IAR, must still be sent to a client. They must be mailed out for a signature and included on the VC-1. If the client has verbally agreed to cooperate and to sign and return the form(s), these elements must be marked as verified and the case wrapped up if no other mandatory verifications are outstanding. Forms used for verification purposes such as the Educational Income and Expense Form (EDUC-1) are not to be sent at this time.

Requests to close a case or voluntarily withdraw an application may be made verbally.

Application/ Pending Other Benefits

TAFDC and EAEDC applications initiated through telephone contact and for which no online request was made must have the application packet mailed with a VC-1. All program applications initiated online must not have the packet mailed for signature.

Cases with pending unemployment must be put on without delay. Clients applying for cash assistance must not have their case delayed due to requiring that they file for unemployment.

The SSI application and appeal requirement for EAEDC clients is suspended.

Categorical Eligibility Factors

If a client's immediately available verification or self-declaration causes question about whether they meet the categorical eligibility for a program, their case must be referred to the Procedural Mailbox for review.

Example: A pregnant client with no other children is applying for TAFDC and she is unsure of her expected due date. She has not had a prenatal exam yet due to COVID-19 impact to non-emergent appointments. This case must be referred for review prior to a determination being made.

Work Requirements & Activities

At this time, all work program requirements have been suspended including those normally subject to ABAWD work rules. No new referrals to contracted DTA employment vendors are to be made.

Clients normally subject to the ABAWD work rules who appear ineligible due to strikes, must not have the strike(s) removed unless the client was legitimately meeting, exempt or had good cause for that strike month. If the client has regained eligibility because of the suspension of ABAWD work rules, apply the appropriate exemption to WR page and enter a regained reason of Exempt on ABAWD Clock page for the month for which benefits are being issued. If one does not apply contact the SNAP Employment & Training Manager after you have exited the case.

TAFDC pre-benefit activities are suspended. This includes both PBJS and Orientation attendance.

Data Sources & Matches

If there is an active FIDM Unit match that is preventing the wrap up of a case, the override must be used. This will require a 3rd level authorization: AU Manager, TAO Supervisor and TAO Director. The Override reason of “FIDM Match” must be selected in the Authorization page. Warrant and SORB matches cannot be overridden. A TAO manager must contact the appropriate FIDM Unit staff to proceed. FIDM Unit staff will continue to monitor and process matches and will conduct additional reviews to ensure program integrity.

All verified upon receipt matches must be used in the eligibility determination. Data that is not considered verified upon receipt that contradicts how a client answered the earned income question (status) is not to be used. If that data confirms a client’s statement about having active income, it must be used.

As a reminder, no data sources are to be printed and scanned into a case record. Only SAVE records, when applicable, are to be attached to a client’s ECF.

Systems Changes

To ensure that active clients do not experience a disruption in benefits and do not receive notices that may be confusing, modifications to BEACON are being made. A batch narrative of: “COVID: An eligibility benefit calculation was done on {DATE} that resulted in an adverse action which has been postponed. All notices of adverse action have been suppressed.” is being entered on all applicable cases.

Adverse Actions

Certain adverse actions will still proceed including closing and reductions due to client request, changes in household composition, income, death or imprisonment. Cases that were temporarily held, have been rewrapped and will release without staff intervention.

IR/ Recertifications/ Reevaluations

Certification dates for clients due to recertify or complete a reevaluation in March, April or May have had their end date extended by 6 months. IRs due in March, April or May have been waived. If a client returns one of the associated forms, staff are to review to see if there are any changes that would benefit the client and enter as case maintenance updates. If the change would result in a decrease of benefits, it must not be processed. If the client has indicated something that is not clear, such as possible loss of income, a series of three cold calls must be made to determine if the case should be updated. A VC-1 or appointment is not to be sent and narrative must be written to address at the next review.

Exception: If the client has submitted verification(s) unprompted by DTA or they have reported information that they are over the 200% gross income limit then a VC-1 must be issued for the missing income verification. The verifications already submitted must be processed according to the verified upon receipt rules. The associated certification forms must be marked as Reviewed and Not Entered if still showing as Available.

Clients who have already had a review submitted and are pending release will proceed.

TAO Operations

Effective Wednesday, March 18, 2020 all TAOs were closed to the public. This change was made as a safety measure for all and to expedite case processing.

Hours & Local Office Coverage

TAO office hours for core staff are 7:00A.M. to 7:00 P.M. Monday through Friday. Staff are assigned to rotating shifts of a minimum of 7.5 hours to comport to social distancing recommendations. Some overtime has also been authorized to respond to the significant increase in requests for assistance. Teleworking opportunities for staff are being expanded.

It is critical, with the change in public access, that each TAO's main number is staffed at all times and that staff are being responsive to client's phone calls.

EBT

Clients requesting a new or replacement EBT card must be issued centrally. Case managers are to explore with clients whether or not they need a card. Staff are to consult with their local office manager if there are extenuating circumstances which require an EBT card to be issued locally. Clients approved at zero must also have an EBT card issued.

Secure document drop off options for clients are available for those who cannot use DTAConnect or mail to the Document Processing Center.

Communication

DTA is using many available means to efficiently communicate with clients and stakeholders to mitigate as much confusion as possible.

Information will be communicated via:

- DTA Connect mobile app push notification;
- Automated text messaging;
- Updates to DTA's website including the removal of office hours and directing clients to contact their local office main number to apply for TAFDC or EAEDC;
- Message on DTA Assistance Line, SAO, CCMO, Ombuds and local office lines.
- Posters at local offices;
- Banner message on DTA Connect portal for applicants or those accessing case information;
- Social media; and
- Correspondence with community partners, legislators and sister agencies.

Clients should be encouraged to check DTA's website for updates as we expect high call volume during this time.

Questions

If you have any policy or procedural questions, after conferring with the appropriate TAO personnel, please have your Systems Information Specialists or TAO management email them to DTA.Procedural Issues.

Systems issues should be directed to the Systems Support Help Desk.