Operations Memorandum Food Stamps OPS090902

February 18, 2009

SUBJECT:Food Stamp (FS) Inter-County Transfer PolicyTO:Executive DirectorsFROM:Joanne Glover, Director, Bureau of Operations

<u>Purpose</u>

To inform County Assistance Offices (CAOs) of the new Inter-County Transfer policy for FS budgets. This change aligns food stamp policy with cash assistance and MA policy regarding inter-county transfers. This policy is effective March 1, 2009.

Background/Discussion

Currently, an FS household that moves from one Pennsylvania county to another county within the state is required to submit a new application when arriving in the new county. The existing policy is a burden to the client and requires a new application, an interview, and verification follow-up. Moving from county to county in Pennsylvania does not affect a recipient's access to benefits through his or her Electronic Benefits Transfer card.

Federal regulations at 7 CFR 273.3(b) allow states to transfer the case record of a household from county to county within the state and to continue the household's certification period without interruption. Therefore, we are changing the current policy to allow CAOs to transfer a case to a new county and continue the household's certification period and FS benefits without interruption. This change aligns the Food Stamp Program with the cash assistance and MA Programs in establishing an intercounty transfer policy for recipients of those benefits. The household is not required to submit a new application or participate in an interview as there is no break in the household's receipt of FS benefits.

Old policy:

When:	Then:
A household reports a permanent move out of the county, but within Pennsylvania,	The CAO will stop benefits for the next issuance for which the deadline can be met. The CAO will advise the household that, if further benefits are needed, the household must contact the CAO in the new county as soon as possible. The losing CAO sends the household a closing notice.

New policy:

When:	Then:
A household reports a permanent move out of the county, but within Pennsylvania,	The CAO will transfer the case record. The household's certification period and FS benefits will continue without interruption. A new application is not required in the new county. An identical FS budget will be opened in the new county. The losing CAO sends the
	household a Confirming Notice.

Exceptions to this policy are:

- An application, Semiannual Reporting (SAR) review, or renewal is pending. The original CAO must process the application, SAR review, or renewal prior to the case transfer.
- The certification period has expired or will expire within the month and the household has not returned the renewal forms. The CAO will attempt to contact the household to complete the renewal. Food stamp benefits stop at the end of the certification period if the household fails to complete the renewal.
- The case is in suspension. The CAO must resolve the issues related to the suspension prior to transferring the case. Transfer the case only if the household remains eligible. If the household is not eligible, take action to close and provide proper notice.

Does the FS Inter-County Transfer Policy apply to <u>all</u> FS budgets?

No. The FS Inter-County Transfer Policy applies to all FS budgets except Extended Food Stamp Benefits (EFS) and Pennsylvania Combined Application Project (PA CAP) cases. EFS households will remain in the losing county until EFS ends. PA CAP cases are automatically processed using information from the State Data Exchange. See <u>Operations Memorandum 070104</u>.

Will the new county be required to review for expedited services and interview the household?

No. The certification period will continue without interruption. The new CAO is not required to interview the household, as there is no break in the household's receipt of FS benefits.

What if the household reports other changes in addition to the change of address?

If the household reports other changes, the losing CAO must act on the information prior to the transfer.

Procedures to transfer FS cases:

The losing CAO, upon receiving notification that a household is moving to a new county, will:

- 1. Data enter the new address. The CAO must inquire about shelter/utility expenses and request verification if questionable. If the household does not provide requested verification, follow procedures outlined in FSH 570.41 and 570.42.
- 2. If applicable, discuss with the household the Able Bodied Adults Without Dependents (ABAWD) requirements for the new county. The CAO will send the household the PA1841. See FSH 575.28 for ABAWD policy.
- 3. Ensure additional changes that have been reported by the household are acted upon.
 - If the verification is required and provided and the budget group remains eligible, adjusted benefits will continue until the end of the eligibility period.
 - If additional verification is required and provided and the household is no longer eligible, <u>or</u> if the household does not provide the required information, an Advance Notice to close is sent.
- 4. Review the case record to ensure that documents are properly filed, including scanned and imaged documents. The case record must be complete and orderly. Documentation and narration of case actions must also be completed.
- Clear any pending Income Eligibility Verification System (IEVS) dispositions. System edits prevent a worker from entering dispositions on IEVS alerts that are assigned to a worker in a different county.
- 6. Notify the gaining CAO of the case circumstances. The recommended method of contact is CAO to CAO email. The caseworker will include all information provided by the household and any other relevant case/budget information, including the renewal due date and ABAWDs in the household. ABAWD information must include name, status, months used (clock), if the losing CAO is waived or non-waived and hours worked per month.
- 7. Transfer the case within five workdays.
- 8. Close the FS budget using reason code 099 Option (3).

The Notice text is as follows:

You permanently moved to another county in Pennsylvania and you still qualify for food stamps. You told us you were moving from ______ County to ______ County. Your food stamp benefits are continued at your new address in your new county. Your food stamp case will be transferred from your old county on _____, and will be automatically opened in your new county on _____. A regular review of

whether you continue to qualify for food stamps must be done before ______. If you have any questions, contact the County Assistance Office at the telephone number below.

The CAO will enter the following information on the Confirming Notice:

1) Losing county name

2) New county name

3) Date FS benefits are transferred from the current county

4) New county open date (the first day of the following

month)

- 5) Renewal date
- 6) New CAO address
- 7) New CAO phone number
- 9. Narrate the reason for transfer and any actions taken.

The gaining CAO, upon receiving notification of the case transfer from the losing CAO, will:

- 1. Enter case into Application Processing.
- Open all budget group members who moved, for the remainder of the certification period as originally established in the losing CAO. There will be no lapse in benefits. Opening the budget is done without waiting for the physical transfer of the case record as long as the losing CAO has completed the required steps outlined above under Procedures to Transfer FS Cases. No notice is required when reopening FS benefits. The automated notice must be suppressed.
- 3. Review ABAWD status if appropriate to ensure correct entry into CIS. An ABAWD's status may change from a waived to non-waived or non-waived to waived county.

NOTE: Any appeal will be heard in the new county of residence.

Next Steps

- 1. Review this Operations Memorandum with appropriate staff.
- 2. Contact your Area Manager for questions.
- 3. This Operations Memorandum becomes obsolete upon automation of the inter-county transfer process and update of the Food Stamp Handbook.