

Policy Clarifications – SNAP

PFS 17989-575

Submitted: 4/28/2016

Agency: CAOs

Subject: 2016 ABAWD Q&As

Question: Several policy and systems-related questions have been raised with the reintroduction of ABAWD time-limited SNAP benefits. Are there any updates?

Response By: Division of Federal Programs and Program Management

Date: 4/28/2016

ABAWD Population

- 1.) **Explain the three different ABAWD populations and what the CAO is required to do for each.**
 - A. **ABWADS who received SNAP prior to March 1, 2016 when the ABAWD clock started:** This population received a questionnaire explaining how to meet exemption criteria and a notice that their SNAP would close 05/31/16 if they did not meet an exemption. The CAO is not required to reach out but should respond appropriately if the ABAWD contacts the CAO to report meeting the exemption criteria.
 - B. **ABAWDS who applied for SNAP 03/01/16 or after:** Workers will receive renewal alerts (after the first full weekend each month) to schedule a renewal for the third month.

March Application examples:

- If the ABAWD was not eligible for EXP SNAP, renewal due in May.
 - If the ABAWD was eligible for EXP SNAP and applied prior to March renewal due in June.
 - If the ABAWD applied after March 15th, renewal due in July. (EXP SNAP, no matter the length of time period, does not count toward the ABAWD clock.)
- C. **ABAWDS in mixed households:** A 233 alert will be generated on the ABAWD's payment date, which is the worker's cue to contact the ABAWD to discuss exemption or participation status. The worker must allow 10 days for the ABAWD to respond. The latest the alert would be generated would be the 15th of the month. The worker will have a minimum of 5 days to respond to the alert while still allowing the required 10 days or more for the ABAWD to respond.

Reminder: Workers **must** allow at least 10 days for requested information to be provided to the CAO.

Alerts

1.) Alert 233 has been received on a case; must the worker schedule a renewal?

No, a renewal does not need to be scheduled for a 233 alert. The worker must reach out to the ABAWD individual and allow 10 days for the ABAWD to respond. The latest the alert would be generated would be the 15th of the month, giving the worker a minimum of 5 days to respond to the alert while still allowing the required 10 days or more days for the ABAWD to respond.

2.) For the 233 alert, what is the suggested language to be used when contacting the client?

By phone or in a CACLET letter. The suggested language is as follows and will be available as a saved form on Docushare:

You are considered an able-bodied adult age 18-49 with no dependents. You may receive SNAP benefits for only three months within a 36-month period unless you meet an exemption, are complying with the work requirement, living in an area where the work requirement does not apply, or are exempt from the work requirement (Please see work requirement exemptions below).

We do not have any information in your case that indicates you meet an exemption. Your benefits will be closing at the end of the month. You may be eligible to continue to receive SNAP benefits if you are meeting participation requirements such as: working at least 20 hours a week, participating in a community service (workfare) program, participating in a Workforce Investment Act Program, a Trade Adjustment Program, an Employment and Training Program, or live in an area where work requirements do not apply, or, become exempt from the work requirement. Please contact the Statewide Customer Service Center at 1-877-395-8930 before your benefits close to report that you are meeting an exemption.

Work Requirement Exemptions: You may be exempt from the work requirement if you are in any of these groups: (1) you are unfit for work due to physical or mental health issues, (2) you are receiving Unemployment Compensation; (3) you are homeless; (4) a child under 18 has joined your SNAP household; (5) you are pregnant; (6) you are needed in the home to care for someone with a disability; (7) you are unable to work because of domestic violence; (8) you are in a drug or alcohol treatment program; (9) you are enrolled in school or training at least half time; or (10) you expect to return to work within 60 days.

Citation: 7 CFR 273.24(b)(1)

Reminder: The CACLET does not serve as a notice. The notice will be generated when the individual is removed from the case and should be sent a 162 A. Workers must not suppress the notice.

Renewals

1.) Under what circumstances must the worker manually change the renewal date?

When an ABAWD's status changes from or to an EB 20, or when any changes are made to the case while in maintenance mode, the renewal date will need to be updated manually. If the certification period is changed, a manual notice must be sent to inform the household. When sending a manual notice, use reason code 049 and use the citation as follows: 7 CFR § 273.10(f) (3), (4), and (5)

Examples:

An ABAWD individual is open March 5, 2016 (and is eligible for EXP SNAP) as an EB 20 with a renewal due in June 2016; this ABAWD individual has no income. At the end of April 2016 the ABAWD calls to report they have moved from a non-waived area to a waived area. The CAO will update the address which would change the ABAWD's eligibility status code from EB 20 to EW 20. Since this individual has zero income the certification would be changed from a 3 month recertification period to a 6 month recertification period. The CAO must manually change the certification period and send a manual notice to the household with the new certification period.

An individual is open in April 2016 as an EW 20 and has a 12 month certification period. In April 2016 the individual calls to report they have moved from a waived area to a non-waived area and would now be coded as an EB 20. In this example if it is a mixed household the recertification dates would not need to be modified as alert 233 will be received when the ABAWD individual's clock hits 3. If it is an ABAWD only household the CAO would need to manually shorten the certification period and send a manual notice to the household notifying them of the change in the certification period.

2.) When would the CAO *not* need to change a renewal date?

The CAO would not change the renewal date if it is a mixed household or if an ABAWD calls to report a change during their 2nd month of benefits and the renewal packet has already been sent out. The CAO can update the SNAP qualification code but allow the recertification date to remain the same since the renewal packet has already gone out.

Example:

An ABAWD opens in April 2016 and received expedited SNAP for the month of April. The ABAWD would have a renewal due in July 2016. In June 2016 a renewal packet has been sent out for the July renewal. In June 2016 the ABAWD calls to report that they now meet an exemption. In this example the renewal date would not be changed because the renewal has already been scheduled and sent out. The CAO should attempt to complete the renewal interview with the individual when they are reporting the change and advise them that the renewal form has been sent out and they will need to complete and return it. The CAO can update the SNAP qualification code to apply the ABAWD exemption. If the renewal is returned and everything is completed, including the interview, than the renewal should be processed and the recertification dates will be updated. If the renewal is not returned than benefits would auto close for failure to complete the renewal process.

3.) In what modes are ABAWDs' renewal dates updated automatically? When do ABAWD renewal dates need to be manually set?

Renewal dates are only automated during case open and reapplication mode. If any maintenance is done on a case and the renewal date should be changed, the worker would need

to manually update the renewal dates and send a notice to the individual. Manual updates to recertification dates should only be done for ABAWD only households.

4.) Why are ABAWDs whose cases were open prior to March 2016 not due for renewal in May 2016?

ABAWDs in this population received notice of SNAP closure of 05/31/16 in February 2016 and will also receive a closure notice in May 2016 explaining that their 3 month time limit of benefits has expired. These notices also provide an explanation about how to meet participation or exemption criteria. The CAO is not required to conduct a renewal or reach out to the client, but must respond appropriately if the ABAWD contacts the CAO with a change in ABAWD status.

Processing and Procedures

1.) An ABAWD reported a move out of state, and received one month of EB 20 benefits. Now they have reapplied, and have just two months of benefits left to them. How is this to be processed?

Both one and two months' worth of benefits must be processed as an NCE. An NCE notice will prepopulate; the worker will need to change this notice to a 660 notice.

2.) What is the procedure for processing EXP SNAP for ABAWD cases?

Please see PFS-17947-506 for a step-by-step walkthrough.

3.) Is there a reason why a pregnancy does not end-date when a newborn is added?

Because a pregnancy may end for reasons other than adding a newborn, a data-entered pregnancy must be manually end-dated.

4.) If there is a retroactive opening of SNAP resulting in an initial OTI of 2 months of EB 20 benefits, will the system automatically send out a renewal packet?

No; in this example, the worker will need to manually schedule a renewal and send out a renewal packet.

Domestic Violence

What codes are used for the Domestic Violence exemption?

Until a new ETP code for Domestic Violence is available, the worker should use ETP code 03 and SNAP Qualification code 02. This will require entering a temporary disability screen with an end date that aligns with the renewal date.

System Errors

1.) In a non-waived area, why are we seeing EWs who should be EBs?

The issue has been reported and will be fixed the weekend of April 23; cases should reflect proper coding effective April 25, 2016.

2.) Why have some ABAWD cases closed without cause?

A system error has been identified; the affected cases have been pulled for review and a fix is scheduled for the weekend of April 23, 2016. See Daily Status 4527.

Service Now

Known issues that should continue to be sent to Service Now:

- System counting EXP SNAP for ABAWD as part of 3 month limit
- Incorrectly failing SNAP cases for ABAWD as reason for failure
- SNAP cases closing incorrectly at 1 month issuance

The following are known issues that will be addressed with a future system update:

- Update to notice text for EB 20 NCEs to reflect EB 20 eligibility rather than suggesting EB 21 status
- Creating a simplified process for EXP SNAP for ABAWDs
- Creating a new SNAP Qualification code for Domestic Violence