

DATE: August 24, 2020

OPERATIONS MEMORANDUM #20-08-03

SUBJECT: Temporary Assistance for Needy Families (TANF) and Supplemental Nutrition Assistance Program (SNAP) September Renewal Modifications and SNAP Interview Requirements Reinstatement

TO: Executive Directors

FROM: Inez Titus
Director
Bureau of Operations

PURPOSE

To inform the County Assistance Offices (CAOs) of changes to September SNAP and TANF renewal processing. To inform CAOs of the reinstatement of the SNAP interview requirement at application and the termination of the postponement of the interview for expedited issuance.

BACKGROUND

In March, the Food and Nutrition Service (FNS) approved a waiver submitted by the Pennsylvania Department of Human Services (DHS) to extend renewal due dates for March 2020 and make them due in September 2020. This effectively doubled the amount of renewals due in September. Additionally, FNS announced last year that all waivers of the interview requirement prior to expedited issuance would end effective April 30, 2020. FNS requires that all states reinstitute the interview requirement at application effective September 1, 2020. The TANF renewal process is adjusted below to align with the SNAP renewal process.

DISCUSSION

SNAP September Renewal Processing

FNS approved DHS's request for a waiver to complete a Semi Annual Review (SAR) for September renewals. This only applies to renewals that are originally due in September 2020. The CAO must complete the full renewal process, including the interview, for March 2020 renewals that were rescheduled to September 2020. Renewals that were originally due in September 2020 will instead complete a SAR for September. The renewal date will be set systematically for March 2021 for these cases.

If	Then
The household was scheduled for a renewal in March and that renewal was postponed to September	The household must be scheduled for a renewal, with interview, in September.
The household was originally scheduled for renewal in September 2020	The household will be mailed a SAR for completion and the renewal will be rescheduled to March 2021.
The household is due for September SAR	The household will be mailed a SAR for completion.

Scheduling of renewals and SARs should follow the normal process and system alerts will be generated. SARs will be sent by the system and must be tracked. Late/Incomplete Notices will also begin being sent for SARs that are not tracked as complete. Any renewal packets that were already mailed for September Renewals should be treated as a renewal. If, once due, the renewal or SAR process is not successfully completed by the client, the CAO will close the SNAP benefit and send the appropriate notice to the client as applicable.

NOTE: Auto-term and auto-suspend functionality will be turned off until further notice. The late/incomplete notice will still act as the closure notice for SAR.

SNAP Application and Expedited Processing

The waiver allowing postponement of the interview prior to issuing expedited benefits officially ended April 30, 2020 but had not been implemented due to the waiver of all interviews in effect due to COVID-19. The waiver for application interviews expires at the end of August. Beginning September 1, 2020, an interview must be completed prior to processing Expedited and ongoing SNAP benefits. If an applicant cannot be reached for an interview, but is otherwise eligible for Expedited SNAP benefits, the CAO cannot issue benefits until the interview is completed. When the application is at 30 days, if an interview has not been completed (and there are no other outstanding pending items), the caseworker will reject the benefits 047 option 2 Failure to Keep Appointment – Ineligible.

NOTE: The interview for expedited eligibility acts as the application interview. Applicants do not need to complete both an interview for expedited and a separate interview for ongoing SNAP.

TANF September Renewal Process

Cash Renewal process for September will follow the guidelines outlined below:

If	Then
The household was scheduled for renewal in September 2020,	The household will be mailed a SAR for completion and the renewal will be rescheduled to March 2021.
The March renewal was incomplete or overdue, the budget is still open, and the renewal date has not been advanced,	The CAO must <u>send a manual renewal for September</u> .
The March renewal was incomplete or overdue, the budget is still open, and the renewal date was advanced to September for renewal,	The CAO must <u>send a manual renewal for September</u> .
The March renewal was completed, and the household is due for September SAR	The household will be mailed a SAR for completion

A list of TANF budgets that require a manual September renewal will be shared with the CAOs. The CAO will close these TANF budgets if:

- the renewal packet is not returned,
- phone interview is attempted and not completed, or
- the client no longer meets eligibility criteria for non-financial, resources or income reasons.

This process applies to the processing of renewals and SARs only and is not applicable to application processing, case maintenance actions, or reconsideration of recently closed or denied budgets.

NEXT STEPS

1. Review this Operations Memorandum with appropriate staff.
2. Direct questions regarding this Operations Memorandum to your Area Manager.
3. This policy is in effect until further notice.