



DATE: March 23, 2020 – April 8, 2020

OPERATIONS MEMORANDUM #20-03-03

SUBJECT: **Revised** - Families First Coronavirus Response Act - Coronavirus (COVID-19) Emergency

TO: Executive Directors

FROM: Inez Titus
Director
Bureau of Operations

PURPOSE

To inform County Assistance Offices (CAOs) and Processing Centers (PCs) of the temporary policies and procedures that are being implemented in response to the COVID-19 emergency. This policy is effective immediately.

BACKGROUND

The Families First Coronavirus Response Act (**FFCRA**) signed into law on March 18, 2020, provides states funding and policy flexibilities amid the Covid-19 emergency. Temporary policy changes outlined in this document will remain in effect until the end of the emergency.

Federal regulations at 7 CFR §273.14 state that no households may participate in the Supplemental Nutrition Assistance Program (SNAP) beyond the expiration of the certification period assigned in accordance with §273.10(f) without a determination of eligibility for a new period. Under the FFFCRA, Food and Nutrition Service (FNS) has approved the Department of Human Services' (DHS) request to extend certification periods and adjust SAR requirements for SNAP.

DISCUSSION

No Closure of Medical Assistance (MA), Long Term Care (LTC), and Home and Community based Services (HCBS) Program Budgets

With the issuance of this document, CAOs and PCs **will not close any MA, LTC, or HCBS budget** at renewal, SAR, case maintenance, or change in circumstance other than for the following reasons listed:

- An individual is no longer a resident of Pennsylvania.
- An individual request that their benefits be closed (Voluntary withdrawal)
- An individual has passed away.

MA related Hearings and Appeals

With the issuance of this document, CAOs will follow the timelines for MA related appeals as outlined below:

- The CAO will accept MA appeals filed within 90 days from the date of the written notice of a CAO decision or action.
- The CAO will continue MA if the individual appeals after 15 days of the date an advance notice is sent **and** requests that their MA benefits be reinstated until the Bureau of Hearings and Appeals makes a hearing decision.
- If the CAO receives an appeal with an expedited fair hearing request, the CAO will continue MA benefits even if the appeal was received after 15 days of the date an advance notice is sent and follow the normal appeal process as outlined in the Supplemental Handbook Chapter 870.

Reminder: For MA, if an individual appeals within the 15 days of the date an advance notice is sent, the CAO should follow current procedure and maintain MA benefits.

Renewals and SAR processing for all Budgets

With the issuance of this document, CAOs and PCs will follow a new temporary procedure for processing MA, Temporary Assistance for Needy Families (TANF) and Supplemental Nutrition Assistance Program (SNAP) renewals and SARs:

- Budgets due for renewal or SAR are **not** to be closed for failure to provide a renewal packet, SAR form or verifications.

Changes have been made to the electronic Client Information System (eCIS) to prevent TANF and SNAP benefits from automatically changing to “Terminated” status if a SAR or Late/Incomplete Notice (L/IN) is not tracked as complete/processed. SNAP benefits will not automatically close at the end of the month if a renewal is not processed. The renewal or SAR date shall remain in overdue status until further notice.

NOTE: No SAR forms are being mailed for benefits with a SAR due in May 2020.

With FNS’ waiver approval, all SNAP renewal due dates are being adjusted six months as follows:

- March renewals will be extended with a due date of September 2020.
- April renewals will be extended with a due date of October 2020.
- May renewals will be extended with a due date of November 2020.

If a March or April renewal has already been completed and provided to the CAO, the interview has been completed, and the renewal can be processed, the CAO should process it and allow the system to set a new renewal due date.

In addition, any pending renewal work items or alerts for SNAP only cases that have their due date extended will be systematically cleared.

- If a renewal packet or SAR form is returned with verification or data source information is reasonably compatible for MA and the individual will remain eligible, the renewal or SAR **should** be processed.

- If a renewal or SAR is returned with verification (or data source information is reasonably compatible for MA) and will result in budget closure due to excess income, the renewal or SAR **should not** be processed for MA. The SAR should be processed for SNAP or TANF benefits.

NOTE: For TANF and SNAP (excluding Elderly/Disabled Simplified Application Process recipients), a renewal interview must be completed.

For more information on recent changes to the TANF interview, see [Ops Memo 20-03-01, Option for Cash Applicants/Recipients to Choose Interview Type.](#)

- This directive applies to renewals and SARs that are currently due as well as overdue renewals and SARs from previous months which have not yet been processed.

CAOs and PCs should process renewals and SARs following current timeliness standards whenever possible. However, due to the Coronavirus (COVID-19) emergency, flexibilities in timeliness and verification standards are being utilized. See the following Ops Memos and Policy Clarifications for more information:

- [Ops Memo 20-03-02](#)
- [Policy Clarification PMA-19804 – 350](#)

Any reported changes should be processed through maintenance mode (using normal processing times) and proper notices issued.

Processing SSI A/J/M category Suspensions

Process SSI A/J/M category suspensions following current procedures. If the MA review produces a failure for MA, then the CAO shall override the failure and build the appropriate SSI related MA category. Narrate that the reason for the override is per the provisions of the FFCRA.

NEXT STEPS

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