

DATE: July 23, 2024

OPERATIONS MEMORANDUM #24-07-07

SUBJECT: Procedures for Handling Returned Mail after the Unwinding Period from the Continuous Coverage Requirement

TO: Executive Directors

FROM: Robert Hixson
Director
Bureau of Operations

PURPOSE

To inform County Assistance Offices (CAOs) of the procedures for handling returned mail after the unwinding period from the Continuous Coverage Requirement during COVID-19 Public Health Emergency.

BACKGROUND

This document provides CAOs with guidance on how to handle cases with different benefit programs when returned mail is received.

DISCUSSION

If the CAO receives returned mail, the CAO will take the following steps:

1. The CAO will check the case file, including narratives and imaging for a new or a corrected address.
 - If the CAO can verify that **the individual has reported a new address** or identifies a correction to the existing address (such as a missing apartment number), the CAO will update the address and resend the mail to the new or corrected address.
 - If the CAO finds a new address, the CAO will send a PA 253 requesting updated shelter and utility expenses for the Supplemental Nutrition Assistance Program (SNAP) if they were not already provided.

2. If there is **nothing in the case file to indicate a new or corrected address** or if the mail comes back as returned after the CAO sent it to the new or corrected address:
 - The CAO will attempt to contact the household by phone to confirm the address. For SNAP change reporting households, the CAO should attempt to contact the household twice. If the CAO is able to confirm the new address with the individual, the CAO will update the address, update shelter and utility expenses, and complete appropriate actions.
 - If the CAO confirms that the current address is correct and it has not changed, the CAO will enter a narrative in case Comments and resend the mail that was returned.
3. If the **CAO is unable to reach the individual by phone**, the CAO will send a PA 253 pending verification letter to the address on file requesting confirmation of the new address.
 - If a forwarding address is available on the returned mail, the CAO will also send a CACLET letter through the Correspondence Notice/Letter Generation module to the forwarding address with the request to confirm the address. The CAO should also request updated shelter and utility expenses for SNAP when sending out the request(s) for information. See sample language for CACLET in [Attachment 1](#).
 - If the individual confirms or provides an updated address, the CAO will update the case and complete appropriate actions.

Note: Remind an individual receiving the State Supplementary Payment (SSP) to update their address with the Social Security Administration (SSA). Any change reported to the CAO by the recipient should be forwarded to SSA in accordance with [Medical Assistance Eligibility Handbook Section 387.12](#).
 - If the individual does not confirm or provide an updated address by the due date on the pending letter, the CAO will take the following actions:
 - For Medical Assistance (MA)/Children's Health Insurance Program (CHIP) budgets where all other eligibility factors have been met, the CAO will take the following action:
 - If the United States Postal Service (USPS) has provided a forwarding address:
 - In-State Forwarding Address –

- When returned mail is received for information required to make an eligibility determination, such as a PA 253 for income or resources, the CAO will close affected MA budgets not subject to continuous eligibility.

Reminder: The CAO will not close the budget if a PA 253 is returned and the information requested is not required to make an eligibility determination.

- When returned mail is received for information not required to make an eligibility determination, such as an eligibility notice, letter, or ACCESS card, the CAO will keep MA/CHIP budgets open and review the address at the next client contact or at the next renewal. The CAO will not enter the address in the system until confirmation of the address is received.
- Out-of-State Forwarding Address – Close MA/CHIP budgets.
 - If USPS has not provided a forwarding address - Close MA budgets for individuals not subject to continuous eligibility.
- Close Temporary Assistance for Needy Families, Refugee Cash Assistance, State Blind Pension and refer SSP-Only cases to the central unit for review.
- Close SNAP if the household is not enrolled in Semi Annual Reporting (SAR).
- Under an approved waiver from the United States Department of Agriculture's Food and Nutrition Service, SNAP benefits should remain open using the existing shelter and utility costs, but this information must be reviewed at the next SAR or Renewal. If the change of address is not reported during SAR or Renewal, the CAO will need to send a request to the household to verify their address.
- If the individual does not confirm or provide an updated address for a case with an SSP budget, the CAO will not close an SSP

budget if resident address on the Exchange 6 has not been updated and individual is in a current pay status. The CAO will notify the SSA in accordance with Medical Assistance Eligibility Handbook Section 387.12 that the CAO received returned mail and has been unable to verify the recipient's address if the budget's Program Status Code (PSC) is other than 44. The CAO will notify the Central Unit that the CAO has received returned mail and been unable to verify the recipient's address if the PSC is 44.

If the CAO receives additional returned mail for cases with MA/CHIP that remained open and/or SNAP budgets enrolled in SAR, the CAO will attempt to confirm the address again following the process outlined in this document if returned mail indicates any new address information. Otherwise, the CAO does not need to act on the subsequent returned mail.

Note: CAOs should make sure that returned mail is scanned and imaged in the case record and should narrate the action taken as well as the new address. This includes narration for SNAP households that remain open but have not verified the new address to be reviewed at SAR or Renewal, whichever is sooner.

If the CAO closes the case but the individual confirms the address within the reconsideration period, the CAO will reinstate benefits with no gap in coverage and will complete an Inter-County Transfer if an address is in another county.

For cases that closed due to returned mail without a forwarding address, the CAO will reinstate MA with no gap in coverage if an address is confirmed prior to a recipient's originally scheduled renewal date. If the confirmed address is in another county, the CAO should complete an intercounty transfer.

Returned Mail and Renewals

When a Case is Open

If an individual reports a change of address after the renewal packet is mailed, and the case is still open, the CAO will re-send the renewal packet to the new address. The CAO will give 30 days to return renewal and required information. For SNAP, the CAO must advise the household that they have until the end of the certification period to return the packet; the packet will advise the household that an interview is needed and how to complete it. The CAO should also explain to the household that they can complete their SNAP renewal via COMPASS or by calling the Consumer Service Center. If the renewal form is not returned, SNAP benefits will close. The CAO cannot re-open SNAP benefits until a renewal form has been received. If the renewal is received after the SNAP certification, the CAO will review and reopen benefits from the date the renewal form is received.

If a renewal packet is returned as returned mail for a case the CAO has completed an ex parte review for and renewed MA/CHIP, the CAO will take steps 1 through 3 outlined above.

If a renewal packet is returned as returned mail before the CAO completes an ex parte review, the CAO will take the following actions:

- The CAO will take steps 1 and 2 outlined above in this document to confirm the address. If the CAO confirms the address, the CAO will send the renewal packet to that address and give 30 days to return the renewal and required information.
- If the CAO is unable to confirm the address and if a forwarding address is available on the returned mail, the CAO will re-send the returned renewal packet to the forwarding address without updating forwarding address in the system and allow the individual 30 days to return the renewal and required information.
- The CAO will close MA/CHIP for failure to provide information necessary to complete a renewal if the renewal was sent to the forwarding address and the renewal and required information are not received by the due date. If the renewal and required information are returned within the reconsideration period, the CAO will process the renewal and ensure there are no gaps in coverage for any affected eligible individuals.

Note: The CAO must narrate in case comments all steps and actions taken.

When a Case is Closed

If an individual reports a change of address during a reconsideration period for a case in which a renewal packet did not come back as returned mail and the CAO was not able to renew MA/CHIP through the ex parte review conducted prior to termination for failure to provide, the CAO will reopen MA/CHIP effective the date of contact and address confirmation. The CAO will re-send the renewal packet to the new address and give 30 days to return the renewal and required information. If the renewal and required information are not received by the due date, the CAO will close MA/CHIP for failure to provide information necessary to complete a renewal. If the individual returns the renewal packet and required information, and remains eligible for MA/CHIP, follow the current reconsideration policy.

If a renewal packet is returned as returned mail for a case with closed benefits during a reconsideration period, the CAO will take the following action:

- The CAO will take steps 1 and 2 outlined above in this document to confirm the address. If the CAO confirms the address, the CAO will send the renewal packet to that address and give 30 days to return the renewal and required

information. The CAO will reopen MA/CHIP starting the date of contact and address confirmation. If the renewal and required information are not received by the due date, the CAO will close MA/CHIP for failure to provide information necessary to complete a renewal. If the individual returns the renewal and required information and remains eligible for MA/CHIP, follow current reconsideration policy.

- If the CAO is unable to confirm the address and if a forwarding address is available on the returned mail, the CAO will re-send the returned renewal packet to the forwarding address and give 30 days to return renewal and required information. The CAO will not reopen MA/CHIP until the individual contacts the CAO to confirm their address.
- If the CAO is unable to confirm the address using the case record and phone contact when a renewal packet is received as returned mail and there is no forwarding address, the CAO will enter a narrative in the Case Comments to document the completed review and will not take any further action.

Note: The CAO must narrate in case comments all steps and actions taken.

NEXT STEPS

1. Share and review this information with appropriate staff members.
2. Direct questions regarding this Operations Memorandum (Ops Memo) to your Area Manager.
3. Ops Memo #23-03-04 Procedures for Handling Returned Mail during the Unwinding Period due to the Ending of Continuous Coverage Requirement will become obsolete upon posting of this Ops Memo.

ATTACHMENT

Attachment 1: [CACLET Language](#)