

Operations Memorandum - Food Stamps

OPS070802

(Revised 09/27/07)

08/23/07

SUBJECT: Shortening Food Stamp (FS) Certification Periods at Application for TANF or Medicaid
TO: Executive Directors
FROM: Joanne Glover, Director, Bureau of Operations

Purpose

To inform County Assistance Offices (CAOs) of the following Food Stamp Program (FSP) policy that will be effective August 31, 2007:

FS households enrolled in Semiannual Reporting (SAR) that subsequently apply for and are authorized Temporary Assistance for Needy Families (TANF) or Medicaid may have their current FS certification period shortened and a new certification period established so that the SAR and renewal periods of all programs are aligned.

Background/Discussion

During the implementation of SAR, the Food and Nutrition Service (FNS) granted the Department of Public Welfare (DPW) a two-year waiver of 7 CFR 273.10(f)(4) to shorten a FS certification period when a FS household applied for cash assistance or Medicaid. The waiver approval was to aid in the transition to SAR. That waiver expired May 31, 2005 and FNS did not approve a renewal. FNS recently approved a new waiver to shorten FS certification periods. The waiver includes certain conditions regarding client notices.

Old Policy:

When:	Then:
A FS household applies for TANF or Medicaid,	<ul style="list-style-type: none">• the certification period of the FS household remained unchanged until the next FS renewal interview.• the CAO has the option to align the TANF or Medicaid renewal period with the existing FS certification period.• if the FS benefits decreased as a result of information received from the cash assistance or Medicaid interview, the household received a

	<p>Notice of Adverse Action for the FSP.</p> <ul style="list-style-type: none"> • if the FS benefits increased, the household received a confirming notice for the FSP.
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New Policy:

When:	Then:
<p>A FS household enrolled in SAR applies for and is authorized for TANF or Medicaid using an application form that includes FS (PA 600 or 600R),</p>	<p>the CAO has the option to complete a FS renewal interview. The CAO should complete a FS renewal interview if it is beneficial for the client. If the worker elects to complete a FS renewal interview, then the current FS certification period is shortened and a new certification period is established to align with the Medicaid or TANF certification period.</p>

- NOTES:**
- The CAO is not required to issue supplemental benefits or to complete overpayments when the FS renewal is completed. For instance, if the CAO does not process the TANF or Medicaid application timely or the client fails to provide verification within 30 days, but does so within 60 days, the CAO does not issue a supplemental benefit or complete an overpayment.
 - A Quality Control error will not occur if the CAO chooses not to shorten the FS certification period.

Old Policy for Notices:

When:	Then:
<p>FS benefits increased as a result of information received from the cash assistance or Medicaid interview,</p> <p>FS benefits decreased as a result of information received from the cash assistance or Medicaid interview,</p>	<ul style="list-style-type: none"> • the household received a confirming notice for the FSP. • the household received a Notice of Adverse Action for the FSP. • no notice is issued for the FSP.

FS benefits remained the same as a result of information received from the cash assistance or Medicaid interview.

New Policy for Notices:

If:	Then:
FS benefits remain the same, increase, or are reduced,	the household will receive a Confirming Notice stating the new benefit amount and the new certification period.

NOTE: For the Confirming Notice, a new option code 6 has been developed to use with reason Code 001.

NOTE: If a household files a request for a fair hearing within 13 days because the FS benefits decreased, and elects to continue to receive its original benefit amount rather than the proposed reduction, the CAO will continue to provide the original benefit amount. The CAO must inform the household of its right to receive the original benefit amount rather than the proposed reduction. Continue the original benefit amount until the hearing is decided, but no longer than through the end of the original certification period. The CAO will need to restore the original certification period. If a household appeals after 13 days but before 90 days, the household will continue to receive benefits at the reduced amount until the hearing is decided.

REMINDER: Narrate all case actions.

New Policy for System Processing:

When a cash or Medicaid budget is being opened, a FS CABUDG screen will be presented. Listed below are the steps to ensure that the proper FS notice is provided.

1. Change the Action Code to an E.
2. Ensure the Automated Notice is a Y.
3. Use Reason Code 001, **Option 6**.
4. Select the notice type CHAN.
5. Check for the correct effective date.

NOTE: An Advance Notice is not used under this circumstance. The effective date must be reviewed to make sure the correct date is listed.

6. Input the new FS certification period when presented with Reason Code 001, Option 6.
7. Access CCBUDG and input the correct FS certification period to align with the Medicaid or TANF certification period.

8. Run a CAPRTL for FS only to get the correct SAR due date.

- Examples:**
1. A FS-only SAR household has a certification period from September 2007 through August 2008. The household's circumstances change and the household applies for and is determined eligible for Medicaid in December 2007. During the Medicaid interview, a FS renewal interview is also completed. Since the FS-only SAR household is now eligible for Medicaid, the new FS certification period is from December 2007 through November 2008. The **FS and Medicaid** SAR review date is May 2008. If FS benefits **remain the same, increase or are reduced** decrease as a result of the client applying for Medicaid, the household is provided with the new benefit amount and new certification period on a Confirming Notice using Option 6. ~~If the FS benefits remain the same or increase, the household is provided the new benefit amount and new certification period on a Notice of Eligibility.~~
 2. A FS-only SAR household has a certification period of July 2007 through June 2008. The household's circumstances change and the household applies for cash assistance. The household is ineligible for cash assistance. The FS certification period will continue to be July 2007 through June 2008.
 3. A FS (SAR)/Medicaid household has a FS certification period of July 2007 through June 2008. The household's circumstances change and the household applies for and is authorized cash assistance from February 2008 to February 2009. During the cash assistance interview, a FS renewal is completed. The household's new FS certification period will be March 2008 through February 2009.
 4. A FS-only SAR household has a certification period of September 2007 through August 2008. The FS SAR due date is February 2008. The household applies for retroactive Medicaid in December 2007. The household is eligible for retroactive Medicaid beginning October 2007. In this example, it would not be beneficial to complete a renewal interview because the household would have a Medicaid certification period of October 2007 to October 2008 with a **Medicaid** SAR due date of March 2008. If a FS renewal was completed, the household would have a certification period of January 2008 through December 2008 with a **FS** SAR due date of June 2008. This would not benefit the household. At the FS SAR review, the CAO would align the FS and Medicaid dates as this is more beneficial for the household.
 5. A FS/Medicaid household has a certification period of August 2007 through July 2008. On March 5, 2008, the household applies for cash assistance. The household fails to provide verification within 30 days and the application for cash assistance is denied. On April 12, the household provides all verification and cash assistance is authorized with a certification period of April 12, 2008 through April 11, 2009. A

FS renewal was completed and the new FS certification period is May 2008 through April 2009. The FS and cash assistance SAR due date is October 2008. There are no supplemental benefits issued or overpayments completed for FS for April or May 2008.

System Processing

A Daily Status will be issued to explain system processing to accomplish the above policy.

Next Steps

1. Review this information with staff.
2. This Operations Memorandum will become obsolete when the information contained herein is incorporated into the FS Handbook.