

~~-Revised 02/19/13-~~

Operations Memorandum - SNAP OPS130203

February 15, 2013

SUBJECT: Delaying the Expedited Interview for Certain Supplemental Nutrition Assistance Program (SNAP) Applications
TO: Executive Directors
FROM: Richard Wallace, Acting Director, Bureau of Operations

PURPOSE

To inform County Assistance Offices (CAOs) that they may authorize Expedited SNAP benefits and postpone the SNAP interview for applicants whose identity can be verified if the CAO is unable to contact the applicant household.

These changes are expected to simplify the administration of SNAP and improve customer service for expedited service households. This change will be implemented February 16, 2013.

BACKGROUND

All applications received at the CAOs are screened for expedited service eligibility. Regulations at 7 CFR 273.2(i)(3)(iii) and 7 CFR 273.2(i)(4)(iii)(A) and (B) state that an interview must be conducted prior to the approval of expedited SNAP. If an interview is not conducted or if the client cannot be reached within the expedited timeframe, the issuance of expedited SNAP benefits is delayed.

The Department of Public Welfare (DPW) has received approval from the Food and Nutrition Service to waive the regulatory requirements mandating that an interview be conducted prior to the approval of expedited SNAP for certain households. An interview must be conducted prior to the issuance of ongoing SNAP benefits for all households.

DISCUSSION

When an application is received, the CAO must attempt to contact the applicant on the same day.

If the individual appears in the CAO and submits the application in person, the CAO must screen for eligibility for Expedited SNAP while the individual is present in the office whenever possible. If the individual appears to be potentially eligible for Expedited SNAP, conduct the interview, verify identity, determine eligibility for Expedited SNAP,

and take the necessary steps to issue an ACCESS card (if the individual does not already have one) that same day while the individual is in the office.

If the application is dropped off, submitted by COMPASS, mail, fax or other means, and the individual is not present in the office to be interviewed, the CAO must narrate the attempt to contact the applicant. The CAO must also ensure that the correct date is entered in CIS as the date of application. The date the application was submitted to DPW on COMPASS or received in the CAO must be entered as the date of application.

If contact on the same day is unsuccessful, the CAO must issue Expedited SNAP before completing the interview if:

- The identity of the applicant can be verified; and
- The applicant household is eligible for expedited benefits.

To verify the identity of the applicant, the CAO shall use one of the following sources if verification was not submitted with the application:

- CAOs should check DPW records for proof of identity. If the applicant is receiving other benefits from DPW, identity has already been verified and does not need to be re-verified. If the applicant is not currently receiving other benefits from DPW but has received SNAP or other benefits from DPW in the past, identity has already been verified and does not need to be re-verified. If the applicant has applied for DPW benefits in the past, and submitted verification of identity with the prior application, that verification can be used to verify identity.
- For individuals unknown to DPW, the CAO may use Social Security Administration (SSA) data. SSA has established an interface to verify the citizenship and identity of an individual declaring to be a U.S. Citizen. If a demographic match is made and SSA's record includes U.S. citizenship information, a positive result will be returned. MCI and CIS will update with an electronic verification code (V) and a source code for SSA (S). This is considered proof of citizenship and identity.
- A collateral contact that can verify the applicant's identity.

The interview and requested verification may be delayed for 1 or 2 months.

□• If the application is received **on or** before the 15th of the month, the interview and requested verification may be

delayed until the end of the following application/current month.

- If the application is received after the 15th of the month, the interview and requested verification may be delayed until the end of the second month.

CAOs must interview the applicant household as soon as possible prior to authorizing continuing SNAP benefits.

For delayed interviews, a new option to reason code 088 has been developed:

088-Option 3 Expedited Waived Interview

You qualify for SNAP benefits right away. We call this expedited service. However, we must still interview you to verify certain information on your application before we can give you ongoing SNAP benefits. You will receive an appointment notice by mail. If you do not participate in the interview, your SNAP case will close.

Regulation 7 CFR 273.2(i)(3)(iii).

Reason code 088, option 3, notifies the applicant that they are eligible and the expedited interview has been waived. When the interview code AW (New Application Waived) is present notice reason 088, option 3, will be prepopulated. This reason code and option cannot be changed or modified.

REMINDER: Reason code 088, option 3, is not an appointment notice. Workers must schedule and send the household a separate notice with the household's appointment time for the interview for ongoing SNAP benefits.

When authorizing Expedited SNAP benefits, if the applicant is known, the household is eligible, **and** on the evaluation, the question, "Has the client been contacted?" is 'No', the budget authorization page will prepopulate the Interview code to 'AW New Application Waived'. There will be no other codes available for entry since the interview was waived.

REMINDER: To ensure the correct notice is going out and the applicant is coded correctly a second expedited evaluation may need to be completed.

EXAMPLE: An application is received December 19, 2012, and the caseworker attempts to contact the client for an interview. There is no contact established, but the worker is able to verify the applicant's identity. The worker

completes the expedited evaluation and answers “No” to the last expedited questions since no contact has been made. The applicant is eligible for expedited benefits through the waiver. The applicant calls later that same day and the worker is able to complete the interview. At this point, a second expedited evaluation needs to be completed since client contact has been established and the caseworker should now answer the last question as “yes.” This second evaluation will ensure the correct notice and coding is applied to the applicant.

Applicants whose identities cannot be determined by the CAO do not qualify for expedited service. Once verification of ID is submitted, the CAO must attempt to conduct an interview. If that attempt is unsuccessful, postpone the interview as stated in this Ops Memo. If ID is submitted by the 4th day after the date of application, expedited benefits must be authorized by the 4th day, so as to ensure that the applicant receives his or her benefits in hand on the 5th day. If verification of ID is submitted after the 4th day, expedited benefits must be issued as quickly as possible.

If the applicant appears in the CAO and provides ID, the CAO should conduct the interview and if the applicant is eligible for expedited, issue the benefits immediately while the applicant is present.

IMPORTANT: When processing SNAP applications, staff must override the system date and enter the actual date the application was received

REMINDER: Be sure to provide the appropriate SUA in calculating eligibility for Expedited SNAP. Please review Policy Clarification 15675506, Expedited SNAP Benefits – Heat and Eat and the SUA, if you have questions concerning the appropriate SUA for Expedited authorizations.

A new supervisory priority item has been created on Workload Dashboard when an expedited SNAP review is not completed within two days. All expedited alerts should be monitored to ensure that reviews are completed within the two-day timeframe and that expedited benefits are issued to eligible individuals within five days.

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 Operations Memorandum will become obsolete when the information is incorporated into the SNAP Handbook.