NORTH DAKOTA DEPARTMENT OF HUMAN SERVICES BISMARCK, NORTH DAKOTA October 15, 2019

IM 5362

TO: County Social Service Directors

Economic Assistance Policy Regional Representatives Economic Assistance Policy Quality Control Reviewers

FROM: Michele Gee, Director, Economic Assistance

SUBJECT: Combined Issuance

PROGRAMS: Supplemental Nutrition Assistance Program (SNAP)

EFFECTIVE: October 15, 2019

SECTIONS

AFFECTED: 430-05-20-50-15-05 Special Procedures for

Expedited Services

430-05-20-50-15-10 Length of Review Period 430-05-35-20-10 Timely Application for Review

Per federal regulation, applications received after the 15th of every month, and the household is determined eligible for expedited services, must be issued a benefit for the initial month and the second month at the time of certification.

These policies are also being updated to remove reference to the TECS system.

Special Procedures for Expediting Services 430-05-20-50-15-05

To expedite the certification process, a worker must use the following procedures.

Interviews

For a household that is entitled to expedited service, the worker must interview the household within the expedited processing standard. If the household states they cannot stay or cannot return for the interview dates and times offered to meet the expedited processing standard or 7-day timeframe, this must be clearly documented in the casefile. The application must then be processed under the 30-day processing standards. If the household fails to keep the scheduled interview, the worker must send notice F018 — Notice of Missed Interview. This notice informs the household that they are responsible to schedule a second interview.

Identity

In all cases, the applicant's or authorized representative's **identity must be verified** through <u>readily available documentary evidence</u> or a collateral contact.

Verification of identity cannot be postponed.

If verification of identity of the applicant is not provided at the interview, the expedited processing standard starts with the date of receipt of identity. For expedited applications identity cannot be waived.

Example:

The county receives the application on May 10 and schedules an interview on May 11. Verification of identity was not provided. The household fails to show for this interview. The worker sends the F018—Notice of Missed Interview to the household. On May 13 the household calls to set up an interview. Worker schedules an interview for May 14.

On May 14 the household comes in for the interview and provides verification of identity. As verification of identity and interview requirements were met on May 14, the worker has through May 16 to process the application and issue an EBT card so benefits are available on May 17.

Verifications

All reasonable efforts must be made to verify within the expedited processing standards, the household's residency, income, alien status and all other factors, through readily available documentary evidence or a collateral contact. Benefits must not be delayed beyond the expedited processing standard because these eligibility factors have not been verified.

Postponed Verifications

Expedited households are the only households where the mandatory verifications can be postponed. All mandatory verifications including questionable information (i.e. income, deductible expenses, social security numbers, work requirements, citizenship, job quits, verification of participation in another state, determination of drug felony disqualification felony conviction parole or probation violators, etc.) must be postponed if unable to verify within expedited processing standard.

Exception:

The identity of the applicant or the authorized representative.

The worker must postpone the verification(s) which normally would be required, if necessary to meet the expedited processing standard.

A household reapplying must not be denied for failure to provide postponed verifications. However, they lose their entitlement to expedited service and are processed under 30-day processing standards.

Examples:

1. Household applied on October 17, was determined entitled to expedited services and certified for two months with postponed verifications. The household failed to provide postponed verifications or recertify.

The household reapplies on December 7, is expedite, however, is not entitled to expedited services because they failed to provide postponed verification in October and November. Mandatory verifications for the December application cannot be postponed and are required to process the application under 30-day processing standards.

If it is determined that benefits were issued incorrectly because verifications were postponed in order to meet the expedited processing standard, a claim is not established.

Exceptions:

- 1. If the household failed to report information, a claim must be established.
- 2. Agency errors.

Issuance

Expedited households that apply on or before the 15th of the month and are certified will be issued the initial month benefits as an immediate issuance.

Expedited households that apply after the 15th of the month and are certified, will be issue the initial month benefit and the second full month benefit as an immediate issuance.

Example:

The county receives an application on September 19th and screens the application eligible for expedited service. On September 20th the county determines the application eligible and authorizes a pro-rated benefit for September as well as the next full month of benefits for October. Benefits for September and October are available on the household's EBT card September 21st.

Work Requirements

The worker must:

1. Require the applicant to complete the <u>SFN 385 - Affidavit for Work Requirements</u>-Affidavit for <u>Supplemental Nutrition Assistance Program (SNAP) Work Registrants</u> or <u>SFN 353 - Affidavit for <u>BESTSNAP</u> Employment and Training Registrants unless exempt.</u>

- Require the applicant to complete the SFN 385 Affidavit for Work
 Requirements or SFN 353 Affidavit for BEST Registrants Affidavit for
 Supplemental Nutrition Assistance Program (SNAP) Work Registrants
 or Affidavit for SNAP Employment and Training Registrants for all
 non-exempt household members. Work requirements for non-exempt
 household members must be postponed, if necessary, to meet the
 expedited processing standard.
- 3. Require an authorized representative interviewing on behalf of a household to complete the SFN 385 Affidavit for Work Requirements or SFN 353 Affidavit for BEST Registrants Affidavit for Supplemental Nutrition Assistance Program (SNAP) Work Registrants or Affidavit for SNAP Employment and Training Registrants for all non-exempt household members.
- 4. Postpone questionable exemptions if the expedited processing standard cannot be met.

Social Security Numbers (SSN)

Expedited households are the only households in which individuals are allowed to participate without a SSN or without proof of application for a SSN for one **full** month of benefits. (If an expedited household applies after the 1st but on or before the 15th, and the only postponed verification is SSN, TECS will only allow a one month review period. The worker will need to contact System Support and Development for assistance in certifying for two months so a full month's benefit can be issued a two month review period will be assigned to the household.)

In all cases, expedited households must be asked to provide a SSN for each individual in the household.

Exception:

A newborn is allowed to participate without a SSN or proof of application of SSN for six months following the month the baby is born or by the next review, whichever is later.

Examples:

The following examples do not include newborns.

1. A five person expedited household applies May 1. Two of the five household members do not have a SSN or proof that they have applied. All five individuals are entitled to participate for the full month of May (May 1 through May 31).

In this example, the household must be certified for the month of May only, and must reapply for June. If at the time of review the two individuals are unable to provide a SSN or proof of application for a SSN, they are ineligible household members (DI) when determining benefits for June or until the SSN is provided. June benefits would be for a three-person household.

2. A five person expedited household applies May 2 (anytime after the first of the month). Two of the five household members do not have a SSN or proof that they have applied. All five individuals are entitled to participate for the partial month of May (May 2 through May 31), and the full month of June (June 1 through June 30).

In this example, the household must be certified for no more than the months of May and June and must reapply. If at the time of July review the two individuals are unable to provide a SSN or proof of application for a SSN, they are ineligible household members (DI) when determining benefits for July or until the SSN is provided. July benefits would be for a three-person household.

Length of Review Period 430-05-20-50-15-10

Households that are certified on an expedited basis and have provided all required verifications, must be assigned regular review periods.

 If verification other than SSN was postponed and the household applied on or before the 15th of the month, the household must be certified for the month of application only.

Example:

A household applies on or before June 15 and verification has been postponed. This household must be certified for the month of June only.

When certified only for the month of application, the worker must send the eligibility notices F100 - Expedite Approval - 1 Month - Postponed Verification and provide the household with the SFN 407 Application for Review. The household must reapply, complete an interview and provide postponed verifications for continued eligibility. If the household does not reapply and provide postponed verifications, they do not qualify for expedited service again.

Exception:

Unless certified under <u>30-day processing standards</u> since the last expedited application.

2. If verification **other than SSN** was postponed and the household applied on the 16th of the month or later, the household must be certified for the month of application and the following month. Benefits for the second month **must not be issued** until all postponed verifications have been provided. A two month review period must be assigned for the postponed verification.

Exception:

If expenses were postponed and not provided by the last working day of the second month, the second benefit month is issued without allowing unverified expenses.

Benefits for the second month must be issued no later than the 5th working day from the date the verifications are received, or the 1st of the second month, whichever is later.

Example:

A household applies on March 16 and is certified for the months of March and April. Benefits for the month of March and April must be available to the household within the expedited processing standard. Benefits for

the month of April must not be issued until all postponed verification has been obtained. April benefits are issued no later than the 5th working day from the date the verifications are received or April 1, whichever is later. A two month review period is assigned with a due date of April 30. A review must be completed and all required verifications received before benefits for the following month can be authorized.

If postponed verifications the review and required verifications are not received by April 30, April benefits are not issued and the case will close March 31 on April 30 for failure to complete the review. The system automatically closes with a certification ending reason.

When certified for the month of application and the following month, the worker must send the eligibility notice.s F101 - Expedite Approval - 2 Month - Postponed Verification. If the application is processed after the 25th day of the application month, the worker must also provide the household with form SFN 407 - the Application for Review. An Application for Review will be generated from the eligibility system on the same day SNAP is authorized and mailed to the household the next business day.

Example:

A household applies on June 16. This household must be certified for the months of June and July. Benefits for the month of June and July must be processed within the expedited processing standard. Benefits for the month of July must not be issued until all postponed verification has been obtained. July benefits are issued no later than the 5th working day from the date verifications are received or July 1, whichever is later a two month review period will be assigned and due on July 31 along with all required verifications.

If the postponed review and required verifications are not received by July 31, July benefits are not issued and the case must be closed June 30 the case will close for failure to complete the review.

The household must reapply, complete an interview and provide postponed verifications for continued eligibility. If the household does not reapply and provide postponed verifications, they do not qualify for expedited service again.

Exception:

Unless certified under 30-day processing standards since the last expedited application.

Timely Application for Review 430-05-35-20-10

An application for review is considered timely when it is filed by the 15th day of the last month of the <u>review period</u> and the following actions are completed by the last day of the household's current review period.

- 1. An interview completed if required; and
- 2. All <u>required verifications</u> received.

When all of these conditions are met, eligibility must be determined by the end of the current review period for the new certification period and the appropriate notice sent by the last day of the review period.

Exceptions - Households Assigned One or Two Month Review Periods

Households certified for one month, and households certified for two months when the application for review is processed in the second month, are allowed 15 days from the mailing date on eligibility notices with request for postponed verification F100 - Expedite Approval - 1 Month - Postponed Verification or the F101 - Expedite Approval - 2 Month - Postponed Verification to timely file an application for review. If the household files their review within 15 days of the mailing date, the review must be registered the 1st of the month and benefits are not prorated.

If the household has completed the interview, provided all verifications, and is eligible, benefits must be made available no later than 30 days after the last issuance. This could include an application for review that is received after the household's current review period has expired.

If the review is not filed timely or the interview and verifications are not provided within 30 days of the last issuance, the review must be processed within 30 days after the review was filed by the household.

Example - One month review period assigned:

A household was certified for May on May 10 and issued May benefits on May 11. Notice F100 dated May 11 was sent to the household. The household timely reapplies for June (prior to May 26), is interviewed, provides all mandatory verifications (prior to June 10) and is found eligible. June benefits must be made available to the household no later than June 10 (30 days after the last issuance).

Example - Two month review period assigned:

A household was certified for April and May on April 25 and issued benefits for April and May on April 26 with postponed verification. Notice F101 of eligibility and request for postponed verifications dated April 26 was sent to the household. The household provides the review form and required verification on May 7. The household is certified for June benefits to be issued on June 1.

The household timely reapplies for June within 15 days (on or before May 10) is interviewed and provides all mandatory verifications (prior to June 11) and is found eligible. June benefits must be made available to the

household no later than June 11 (30 days after the last issuance) and are not prorated.

The worker must revert the case to open, NEXT to CLIR and use function 3, enter the case, office, unit and caseload number and enter off the screen. In this instance, the worker must register the application for review with a benefit start date of June 1 on the REAP screen.