### STATE OF CONNECTICUT

### DEPARTMENT OF SOCIAL SERVICES PROGRAM INFORMATION BULLETIN

Raymond Singleton Jr., Deputy Commissione

Effective Date

**INFORMATION BULLETIN NO: 13-04** 

PROGRAM: SNAP

Subject:

Reopening SNAP Applications, Recertifications and PRFs

(Reinstate vs. Re-grant)

**Introduction**: The SNAP recertification process includes the recipient completing and submitting a renewal form, completing an interview and providing any mandatory verification.

The SNAP periodic report form (PRF) process includes the recipient completing and submitting a PRF and providing any mandatory verification.

This bulletin clarifies when the worker should reinstate or re-grant a SNAP AU when it closes due to failure to reestablish eligibility (EMS reason code 235 for recertifications and EMS reason code 260 for PRFs) and eligibility is subsequently reestablished.

This bulletin also clarifies how to reopen a SNAP AU when an application closed on the 30<sup>th</sup> day for failure to provide requested verification and the verification is subsequently received.

Updates to UPM procedure pages 1505.40-P and 1505.45-P will be transmitted separately.

### General principles

No recipient may participate beyond the expiration of a SNAP certification period without a determination of eligibility for a new SNAP certification period.

#### **PRFs**

A PRF must be submitted at the midway point of a SNAP certification period to continue SNAP eligibility within a certification period.

SNAP households must complete, sign and return the PRF by EMS month end at the midway point of the SNAP certification period (6<sup>th</sup> month for 12 month certifications and 12<sup>th</sup> month for 24 month certifications). Households that do not submit a completed PRF will be discontinued at the midway point of the certification period even when there are no changes to report. If DSS does not process a PRF timely and the SNAP AU closes, the worker must reinstate the AU and process the PRF.

If the PRF and any mandatory verification are received within 30 days of the date of closure, the AU should be re-granted effective the date the PRF and mandatory verification is received, whichever is later. On EMS, during

### General principles (continued)

interview (O), the worker must enter an "R" (reopen) in the "Appl Intvw" field on the MISC screen. When finalizing (Q), the certification period end date must be adjusted to match the original end date on the FSFI screen.

If the PRF is received more than 30 days after the date the AU is closed, the recipient must complete a new SNAP application.

#### Recertifications

If a recertification of eligibility cannot be processed before the current certification period end date, the AU must be closed at the end of the certification period regardless of whether it is the fault of DSS or the recipient. If the recipient submits a renewal form timely but DSS fails to complete the recertification, we must continue to process the recertification, even though the AU closed at the end of the certification period. This is true regardless of when the AU is processed. If the recipient is found eligible and has also provided all mandatory verifications timely, the worker must use the reinstatement function (M) to reinstate the AU back to the first day of the month after the certification period end date.

If the recipient submits the renewal form within 30 days of the date the AU closed, DSS will continue to process the recertification. The worker must reopen the AU using the (J) function effective the date the form is received by DSS. The AU may be subject to expedited processing.

If the recipient submits the renewal form more than 30 days after the date the AU closed for failing to complete the recertification process, it is considered a new application and must be processed as such, including determining if the client is eligible for expedited processing.

### **Applications**

If DSS incorrectly denied the applicant's application on the 30<sup>th</sup> day because DSS had in fact received the verification before the 30<sup>th</sup> day and the applicant is determined to be eligible, the worker reopens the AU using the (J) function and provides benefits back to the date of application.

If DSS receives the requested mandatory verification within 30 days after the date the application was denied and within 60 days of the original application date and the applicant is eligible, the worker reopens the AU and provides benefits effective the date the applicant provides all mandatory verification.

If DSS receives the requested mandatory verification more than 60 days after the date the application was filed, the applicant must complete a new application.

### Recertifications

Interview & the Notice of Missed Interview (NOMI)

If the recipient submits the renewal form before the 15<sup>th</sup> day of the last month of the certification period, the worker must initiate the AU's recertification in

EMS, and attempt two cold calls. If the cold calls are unsuccessful, allow the 12 day on-demand interview notice to be sent by EMS. If necessary, this time frame may be shortened to 7 days. This will allow the household 10 days after the interview due date to provide mandatory verification before the certification period ends.

If the recipient submits the renewal form after the 15<sup>th</sup> day of the last month of the certification period, the worker must attempt two cold calls to complete the interview. If the two cold calls are unsuccessful, shorten the Redet Interview date on MISC, giving the recipient enough time to receive the notice and call the Benefit Center to complete the interview (7 days is recommended, however, 5 days may be used when appropriate). If the recipient does not contact the Benefit Center to complete the interview by the interview due date, and the AU is still active in EMS, the NOMI will be automatically sent.

If the recipient submits the form after the 15<sup>th</sup> day of the last month of the certification period, and they did not call the Benefit Center to complete the interview and the AU has closed in EMS there is no need to send the NOMI manually.

When possible, shorten the 12 day time frame on MISC to allow the recipient time to receive the notice and call the Benefit Center before the EMS month end date to allow EMS to generate the NOMI before the AU closes.

#### Verification

### Recertifications and PRFs

For recertification and PRF processing, the worker must provide the recipient a written notice of the verification being requested (W1348) including the due date for any mandatory verification. The worker must list the verifications requested and the due date in the narrative on EMS.

At PRF, the worker may contact the recipient by phone to clarify information on a PRF or to verbally request verification that would result in an increase in SNAP. A W1348 must be sent if the requested verification is mandatory or if it is required for the recipient to remain active on another program.

**Note:** We do not close the AU when the recipient does not submit requested verification that is only required to allow a deduction rather than to establish eligibility.

For example: The recipient provides all mandatory verification but does not provide verification of out-of-pocket child care expenses. The recertification is completed without allowing the child care deduction.

### **Applications**

A worker must allow an applicant at least 10 days to submit verification (the W-1348 in ConneCT will prefill for a date 11 days out to account for overnight batch processing). If an applicant has not had at least 10 days to submit verification or if any received mandatory verification has not been processed

### Verification (continued)

by the 30 <sup>th</sup> day, then the delay is an agency delay and the processing period is extended for an additional 30 days.
Reinstate and re-grant are 2 different processes in EMS.
Tremstate and re grant are 2 amorem processes in Ewie.
Re-grant will allow you to select any day of the month as the begin date on the INCH screen when reopening an AU.
Reinstate will only allow the first day of the month as the date an AU is reopened.
<b>Important:</b> The worker must use the reinstatement function (M) in EMS to reopen the AU back to the first of the month. In the past, staff may have used JOPQ because this method was quicker. However, to ensure the accuracy of our application data we must use the reinstatement function when the benefits should be processed back to the first of the month. An AU must be <u>reinstated</u> when an eligible recipient provides the form prior to the end of the certification period.

### EMS: How to Reinstate (Selection M on AMEN)

### For the current and any historical months:

- 1. AMEN Selection M Reinstatement
- 2. AMEN Selection R Interim/Historical Change
- 3. RMEN Selection B Add a Historical AU Change Benefit Error Group
- 4. RMEN Selection K Approve an Underpayment Benefit Error Group Note: Step 4 is a supervisory function.

Repeat above steps for each historical month that has been closed that needs to be reinstated.

### For the ongoing month:

- 1. AMEN Selection M Reinstatement
- 2. AMEN Selection R Interim/Historical Change

For recertifications, in addition to reinstating (M) you must also initiate the recertification (N).

For PRFs, when reinstating (M) enter the PRF received date on MISC.

### EMS: How to Re-grant (Selections J, O, P, Q on AMEN)

### To re-grant an AU on EMS:

- 1. AMEN Selection J Screening
- 2. AMEN Selection O Interview
- 3. AMEN Selection P Process Application Month
- 4. AMEN Selection Q Finalize

When re-granting because the recipient did not provide the form until after the AU closed, the application date is the date the form was received. When the W1348 was sent timely (by the 15<sup>th</sup> of the last month of the recertification cycle) but verifications were not received until after closure, the application date is the date the verifications were received. If the verifications are received more than 30 days after closure, a new application must be filed.

For PRFs, if you need a specific date other than the 1<sup>st</sup> of the month, shorten the recertification cycle end date to match the original end date on FSFI.

# Effective Date is the first day of the month following the month of closure

- The recipient submits the completed renewal form with the mandatory verification and completes the interview prior to the certification end date however the worker does not complete the recertification on EMS before the AU closes.
- The client submitted the completed renewal form prior to the certification end date without the mandatory verification and the W1348 due date is past the date the AU closes and the mandatory verifications are submitted by the due date on the W1348.

### Effective date is the date of receipt.

- The renewal form is received and the interview is completed timely. A W1348 is sent with a due date prior to the certification end date and the mandatory verifications are received within 30 days after the AU closed. The effective date is the date the mandatory verifications were received.
- The AU closed for failure to provide the PRF and the PRF is received within 30 days after closure. The effective date is the date of receipt.
- An applicant was interviewed and denied at day 30 for failure to provide verification. The verification was received between day 30 and day 60, the effective date is the date of receipt.

## A new application must be submitted

- The recipient did not provide any of the mandatory verification until more than 30 days after the certification period ends.
- The AU closed for failure to provide the PRF and we receive the PRF but it has been more than 30 days past the closure date.
- We requested mandatory verification and the applicant failed to provide it by the 60<sup>th</sup> day after the date of application.

### **Examples for Recertifications and PRFs**

For the purpose of all examples below, assume the AU was closed 10/31/13, the end of the certification period. Also assume a telephone interview was conducted and the household is eligible.

Date form received	Date EW sent W1348	Date mandatory verifications received*	Date EW processes AU	Appropriate Action	Effective Date
10/2/13	10/15/13	12/4/13	N/A	Client must submit a new application	Date signed application is received
10/3/13	10/13/13	11/4/13	11/10/13	Re-grant	11/4/13
10/12/13	Not needed	10/12/13	11/3/13	Reinstate	11/1/13
10/12/13	11/4/13	11/11/13	11/14/13	Reinstate.	11/1/13
10/12/13	11/4/13	11/25/13	11/27/13	Re-grant	11/25/13
10/25/13	10/28/13	11/4/13	11/15/13	Reinstate	11/1/13
11/3/13	Not needed	11/3/13	11/5/13	Re-grant	11/3/13

\*Assume no mandatory verifications were received until this date.

Disposition:

Retain for future reference.

Distribution:

**SNAP Division Staff** 

Responsible Unit:

SNAP Division (860) 424-5030