

January 26, 2024

## **GENERAL LETTER NO. 7-B-75**

ISSUED BY: Bureau of Financial, Food, and Work Supports

Division of Community Access

SUBJECT: Employees' Manual, Title 7, Chapter B, **SNAP Application Processing**, 4. 6, 7, 8, 11, 15,

16, 19, 21, 23, 24, 26, 28, 31, revised.

## **Summary**

This chapter is revised to update interview procedures

## **Effective Date**

Upon receipt.

## **Material Superseded**

Remove the following pages from Employees' Manual, Title 7, Chapter B, and destroy them:

<u>Page</u> <u>Date</u>

4. 6, 7, 8, 11, 15, 16, 19, 21, 23, 24, 26, 28 September 23, 2022 March 3, 2023

## **Additional Information**

Refer questions about this general letter to your area income maintenance administrator.

## **Notifying and Screening for Emergency Service**

Legal reference: 7 CFR 273.2(i)(2)

**Policy:** Notify all applicant households about emergency service criteria. Screen all SNAP applications immediately upon receipt to determine if the household may be eligible for emergency service.

Procedure: You may notify households using an application insert or using your appointment letter.

- If your office chooses to notify by application insert, include:
  - Comm. 084, Information on Emergency Service with every English application, and
  - Comm. 084(S), Informacion Sobre El Servicio De Emergencia with every Spanish application.
- If your office chooses to notify by appointment letter:
  - The appointment letter must have a section on the front with the following wording:

Emergency Appointment:yesno	
(See the attached information on emergency service.)	

Check "yes" or "no" to tell the household whether it may be entitled to emergency service.

- You also must send the information about emergency service by:
  - Enclosing Comm. 084 or Comm. 084(S), or
  - Copying the Comm. 084 or Comm. 084(S) content on the back of the letter.

A receptionist, a volunteer, or any other employee shall screen to see if the household may be eligible for emergency services whenever:

- Someone comes into the office to apply, or
- One of the following applications is filed:
  - Food and Financial Support Application, form 470-0462 or 470-0462(S).
  - Review/Recertification Eligibility Document (form 470-2881), if filed after the end of a certification period.

Use the criteria under **Determining Eligibility for Emergency Service** to make this determination.

**Comment:** See <u>Emergency Service</u> for information on processing requirements for a household eligible for emergency service. Note that when you schedule the interview, keep in mind you have only until the seventh calendar day after the application was filed to:

- Interview the household,
- Approve benefits, and
- Have an electronic benefit transfer card in the household's hands.

## **Interviews**

Legal reference: 7 CFR 273.2(e)(1) and (3), 273.12(a)(3), 273.21(g)

Policy: All households must have an interview before being certified. Schedule a phone interview unless:

- You determine that a face-to-face interview is appropriate, or
- The household requests a face-to-face interview.
- Complete a home-based interview only upon request from the household when a hardship exists.

Schedule all interviews so that eligible households receive SNAP within:

- Seven days after they apply if identified as eligible for emergency service, or
- 30 days after they apply.

**Procedure:** Upon receipt of an application, attempt to contact the household by phone. If you make contact and they agree to do the interview immediately, do it then.

If contact isn't made with the household during the initial call:

- Schedule a phone interview by leaving the standard voicemail message at the phone number they provided.
- Give the household at least 24 hours advanced notice of the interview. For example, a worker calls a client at 10:30 a.m. on Monday but doesn't make contact and leaves a voicemail to schedule an interview. That interview can't be scheduled before 10:30 a.m. Tuesday.
- The timeframe for interviews cannot exceed a two-hour window of time. For example: 8 a.m. to 10 a.m.
- Document the specific date and time of the scheduled interview in WISE.

If the household doesn't have a phone, or a voicemail message can't be left at the phone number provided, an appointment letter must be mailed within one business day.

If a worker fails to attend an interview they scheduled with a household, the worker must schedule another interview and follow the same requirements for scheduling initial interviews. For example, a worker has a scheduled interview on Monday between I-3 p.m. The worker is running behind and isn't able to call the household until 3:15 p.m. The calls to the household go to voicemail. In this situation, the worker needs to schedule another interview with the household, following the same requirements as initial interview scheduling. The worker cannot send a NOMI because the worker failed to attend the scheduled interview.

**Comment:** The interview is an official and confidential discussion of household circumstances. Don't send a request for verification prior to the interview. The purpose of the interview is to obtain the details of the household's situation so eligibility can be determined. After the interview, you will know what verification is needed.

The following sections explain:

- Standard voicemail messages
- How to conduct interviews
- Voter registration procedures during the interview
- Failure to attend the interview

# **Standard Voicemail Messages**

There are two approved messages to leave on voicemail when scheduling an interview. The messages differ depending on whether a household qualifies for emergency services.

Non-Emergency Applications

"This is (worker name) with the HHS calling for (client name). A phone interview is required for your SNAP/FIP application. I will call you on (day of the week and date) between (two-hour timeframe) to hold the interview. If I can't reach you, your application may be denied. If this time does not work for you, please call me immediately so we can reschedule. Thank you."

REMEMBER: When calling for the scheduled interview, two attempts must be made (at least five minutes apart) and document before issuing a *Notice of Missed Interview (NOMI)* (522).

Emergency (Use only if interview must be completed the same day to meet timeframes.)

"This is (worker name) with the HHS calling for (client name). A phone interview is required for your SNAP application. From the information on your application, it looks like you may be eligible for Emergency SNAP. Please call me back today by 3:30 p.m. at (worker phone number) to complete your interview. If I don't hear from you by 3:30 p.m., I will call you on (the next business day) between (two-hour timeframe). If I can't reach you, your application may be denied. If this time does not work for you, please call me immediately so we can reschedule. Thank you."

REMEMBER: When calling the following day for the scheduled interview, two attempts must be made within the scheduled interview window (at least five minutes apart) and document before issuing a *NOMI* (522).

## **Conducting an Interview**

Legal reference: 7 CFR 273.2(e)(1), 273.21(c), 273.12(b)(1)

**Policy:** An interview is required even if the application indicates that the household may be ineligible. The person interviewed can be the head of the household, the spouse, any responsible member of the household, or an authorized representative. Applicants may have anyone they want present during the interview.

**Procedure:** Call the applicant during the scheduled interview window. If there is no answer, wait at least five minutes and call again before issuing the required NOMI (522). You must document the specific date and times you attempted to reach the applicant.

- Review with the applicant all information and questions on the application.
- Ask if changes in household circumstances happened between the application date and the interview.
- Using the application, information gathered before the interview, and information learned during the interview, resolve any unclear, inconsistent, or incomplete information with the household.
- Explain:
  - Rights and responsibilities.

- Electronic Benefit Transfer (EBT) and what is not allowable for purchase with EBT. See 7-A, <u>Participant Use of Benefits</u>.
- How long it takes to process the application.
- Prospective budgeting.
- Reporting requirements and tell the household they will receive form 470-2960 or 470-2960(S), Reporting SNAP Changes, with the gross income limit that applies to the household.

For face-to-face interviews, you must also document whether it was the decision of the applicant or worker to conduct the interview in person.

Document the type of interview that is conducted on the Automated Benefit Calculation (ABC) system TD02 screen. See 14-B(5) for instructions.

Provide the client a copy of the pamphlet, Comm. 51, *Information Practices*, at time of application or interview and whenever the clients request it.

## **Voter Registration Procedures During the Interview**

Legal reference: 721 IAC Chapter 23

**Policy:** The Department is responsible for helping clients fill out *Voter Registration* forms and for mailing the forms to the county election office. All applications, RREDs, and RFIs include the website where clients can complete the *Voter Registration* form online and to contact their local office for more information about registering to vote.

**Procedure:** See <u>6-Appendix</u> for a copy of the *Voter Registration* form and office procedure instructions regarding processing the forms.

#### Failure to Attend the Interview

Legal reference: 7 CFR 273.2(e)(3)

**Policy:** If the household fails to attend the scheduled interview, notify the household that it missed its scheduled interview and that it is responsible for rescheduling.

**Procedure:** Give the household five additional minutes beyond the time scheduled regardless if you are calling the household or they are required to call you.

If the household fails to attend a scheduled interview, send the *Notice of Missed Interview (NOMI)* (522) immediately and deny the application on the 30th day following the date of application. When the 30th day falls on a weekend or holiday, make system entries on the next working day. See <a href="Denying an Initial Application">Denying an Initial Application</a> for additional information.

If the household contacts you in the 30-day application-processing period to pursue the application, you must schedule a second interview.

## **Verification**

Legal reference: 7 CFR 273.2(f)(4), (5), and (6)

Verification is third-party information or documentation that confirms the accuracy of statements on the application. There are four sources of verification:

- Documentary evidence
- Collateral contacts
- Home visits
- The state Income and Eligibility Verification System (IEVS)

Households must verify certain eligibility factors to get SNAP. More specific verification information and requirements are in 7-C, 7-D, 7-E, 7-F, and 7-G. The household has the primary responsibility to explain its situation and provide documentary evidence to support its statements on the application. The household must also resolve any questionable information.

Document everything that supports the decision about the household's eligibility and benefit level. Your documentation needs to contain enough detail so that anyone reading it can understand what was decided and why. Documentation helps to support a decision and may point out inconsistencies in information given by the household.

Accept any reasonable documentary evidence from the household. Information from another source may disagree with statements made by the household. Give the household 10 days to resolve any discrepancy before determining eligibility or the benefit level.

When you request additional information from the household, document the date of the request, what information was requested, and the due date given to the household. You cannot cancel or deny a household for failure to provide information if the request is not documented in the case record, or if the household was not given 10 full days to provide verification.

Help the household get verification if the household asks for help. Do not deny or cancel the household when a person outside the household fails to provide information. For this policy, the following people are considered to be inside the household:

- An ineligible alien
- An ineligible student
- A SSI recipient in a cash-out state
- A person disqualified for intentional program violation
- A person disqualified for refusing to comply with a work requirement
- A person disqualified for failing to provide a social security number
- A person who is a probation or parole violator, or a fleeing felon
- A person who is ineligible for failing to meet the work requirements for people aged 18 to 50

## **Verifying Disability**

Legal reference: 7 CFR 273.2(f)(1)(viii)

Verify the disability of a household member. See 7-A, <u>Disabled Member</u>, for requirements for a determination of disability.

Households can verify disability by providing proof that they get benefits:

- Under Titles I, II, X, XIV, or XVI of the Social Security Act.
- From a Railroad Retirement disability annuity from the Railroad Retirement Board and has been determined to qualify for Medicare.
- As interim assistance pending for receipt of SSI or disability-related Medicaid.
- From the Veterans Administration (VA) that shows the person is:
  - A veteran receiving disability benefits from a disability (service-connected or nonservice-connected) that is total or paid at the total rate from the VA, or
  - A disabled surviving spouse or disabled child of a veteran entitled to compensation or pension benefits due to the death of the veteran.

#### **Questionable Information**

Legal reference: 7 CFR 273.2(f)(2)(i)

Verify all factors of eligibility that are questionable if they affect the household's eligibility and benefit level. Examples of questionable information are:

- Information on the application that differs from statements made by the applicant.
- Information that is inconsistent with other information on the application or previous applications.
- Information that is inconsistent with information received from other sources.

When deciding if information is questionable, look at each household's individual circumstances, and allow the household a chance to explain the situation. Do not deny eligibility solely because information is questionable.

For example, if expenses exceed income, do not automatically deny an application. Give the household the opportunity to explain the situation. If the household cannot provide a reasonable explanation, ask for further verification of how the household is paying its bills. If the household does not provide the requested verification, deny or cancel assistance.

## **Processing Standards**

Legal reference: 7 CFR 273.2(g)

Regulations require that applications be processed within a certain amount of time. Calculate this length of time from the date the household files an application. The first day of the processing period is the first calendar day after the date the application is filed.

The following sections describe the requirements for:

- Approving an initial application
- Denying an initial application
- Dealing with delays in processing an application

## **Approving an Initial Application**

Legal reference: 7 CFR 273.2(g)(1), 274.2(b)

All eligible households must get their SNAP benefits within 30 calendar days after the date they apply. Allow two days for mail delivery when determining what date you must make system entries in order for the household to get benefits within 30 calendar days. See <u>Delays in Processing</u> for exceptions.

Households eligible for emergency service have a shorter processing standard. See <u>Emergency Service</u>. Households applying for recertification also have different processing time limits. See <u>7-G</u> for more information on these policies.

Issue form 470-0485, 470-0486, or 470-0486(S), *Notice of Decision*, when approving an application. The notice must:

- State the amount of the allotment for the month of application and the current month.
- Indicate the amount of the allotment for the rest of the certification period.
- State the beginning and ending dates of the certification period.
- Contain information on how benefits were calculated.
- Inform the household that the amount of SNAP will vary if changes are anticipated at the time of certification.

If a household is ineligible for the month of application but eligible for following months, the notice must explain why. The notice must give the same information if benefits are approved for the month of application but denied for the next month. The notice must also include an explanation of the household's appeal rights, the telephone number of the local office, and if possible, the name of the person to contact for more information.

The following sections explain how to:

- Handle future changes reported at application
- Establish the length of the certification period
- Determine the effective date of benefits

# **Denying an Initial Application**

Legal reference: 7 CFR 273.10(g)(1)(ii) and (iii), 273.2(g)(2)

Issue a *Notice of Decision*, using form 470-0485, 470-0486, or 470-0486(S), after determining the household is ineligible. This notice must include:

- An explanation of the reason for the denial.
- The manual chapter and subheading supporting the denial.
- The rule or regulation reference supporting the denial.
- The household's right to request an appeal.
- The toll free number of the office.
- If possible, the name of the person to contact for more information.

If the household did not appear for a scheduled interview and did not contact the office to reschedule within 30 days of the date of application, deny the application. Make system entries for the denial on the thirtieth day following the date of application. If the thirtieth day falls on a weekend or holiday, deny the application by making system entries the next working day.

When additional information or verification is needed, notify the household in writing what they must provide and give them 10 days to provide it. The 10-day period begins with the day after you issue the request. If the 10th day falls on a nonworking day or a legal holiday, extend the due date to the next working day for which there is regular mail service.

If the household fails to provide the missing verification by the due date, deny the application. You do not have to wait until the thirtieth day to deny an application for this reason.

NOTE: You must **reopen** the case if the household provides the missing verification within 60 days of the application date. Issue benefits from the date of the application if the household provides the verification within the first 30 days. If the household provides the verification during the second 30 days after application, issue benefits from the date the missing information is provided.

## **Delays Caused by the Household**

Legal reference: 7 CFR 273.2(h)(2), 441 IAC 65.6(1)

A delay in processing is the fault of the household if the household failed to complete the application process but you took all required action. See <u>Delays Caused by the County Office</u> for required action the county office must take.

The delay is the fault of the household when a household fails to appear for its interview, asks for another interview, and the rescheduled interview:

- Is scheduled after the 20th day but by the 30th day following the date the application was filed, but the household either does not appear or does appear but does not bring verification; or
- Is scheduled after the 30th day following the date the application was filed at the household's request.

If the household takes the required action after the thirtieth day but before the sixtieth day following the date of application and is found:

- Eligible, prorate benefits from the date that the household took the action. The household is not eligible for any benefits for the first 30-day period. For example, if the household applies on May I but does not give the necessary verification until June 15, prorate benefits from June 15.
- Ineligible, send a *Notice of Decision* denying the application.

If the household does not do what it is supposed to do by the sixtieth day, deny the application on the sixtieth day. If the sixtieth day falls on a weekend or holiday, make computer entries on the next working day. Do not send a second notice when a notice of pending status was sent.

#### **Delays Caused by the County Office**

Legal reference: 7 CFR 273.2(h)(3)

The delay is the fault of the county office if the required actions were not taken, such as:

- Offering the household help in filling out the application.
- Helping the household obtain verification, if the household requests help.
- Allowing the household at least 10 days from the request to provide missing verification.
- Rescheduling a requested second interview within 30 days following the application date if the household failed to appear for the interview.

If the household is found eligible, issue benefits back to the date of application.

If household is found ineligible, send a *Notice of Decision* even when a notice of pending status was sent.

## **Emergency Service**

Legal reference: 7 CFR 273.2(i)(2), 274.2(b)

Time limits for processing an application under emergency procedures are much shorter than those for normal processing. Determine the household's eligibility for emergency service at each initial application. The household does **not** have the option to decline emergency service.

A household can get emergency service only when the household meets one of the emergency criteria in the first month of the certification period. A household that is ineligible during the month of application can receive emergency service in the next month if it meets emergency criteria in that month. A new application is not needed.

There is no limit to the number of times a household can be certified under emergency procedures. EXCEPTION: To be eligible for emergency service, a household that was canceled for not providing postponed verification must either:

- Have been certified under normal processing time frames, or
- Have provided the previously postponed verification. However, a household cannot be required to provide verification that is no longer needed.

## The following sections explain:

- Eligibility for emergency service
- Verification for emergency service application
- Determining emergency benefits
- Processing time frames for emergency service

# **Determining Eligibility for Emergency Service**

Legal reference: 7 CFR 273.2(I)(I) and (3), 273.11(a), 274.2(b)

**Policy:** Provide emergency service to a household that:

- Has \$100 or less in liquid resources and less than \$150 in monthly gross income; or
- Has shelter costs (monthly rent or mortgage plus the applicable standard utility allowance) that are higher than its combined gross monthly income and total liquid resources; or
- Has at least one member who is a migrant or seasonal farm worker, is destitute, and has liquid resources of \$100 or less. (See 7-I, Emergency Services, for what "destitute" means.)

**Procedure:** When you determine how much a household has in gross monthly income:

- Do not count any excluded income. See 7-E.
- For self-employment, gross monthly income means the annualized monthly amount after selfemployment expenses. See 7-1, Self-Employed Households, for self-employment income and expenses.

# **Verification for Emergency Benefits**

Legal reference: 7 CFR 273.2(f)(1)(i); 273.2(i)(1), (2), and (4); 273.11(a); and 274.2(b)

Policy: You must verify the identity of the applicant. Any other verification can be postponed.

**Procedure:** Verify the applicant's identity using:

- A collateral contact (see <u>Collateral Contacts</u>), or
- Any other available source of proof (see <u>Documentary Evidence</u>).

You can postpone other verification for 30 days from the application date. See <u>Verification</u> for what is considered verification and what must be verified. Tell the household in writing what proof must be provided. Document in the case record what verification was postponed.

Comment: When you postpone verification of:

- A social security number, see 7-C, <u>Good Cause for Not Supplying a Social Security Number</u>.
- A migrant household's out-of-state information, more time may be allowed. See 7-I, <u>Migrants and Seasonal Farm Workers</u>.

## **Determining Emergency Benefits**

Legal reference: 7 CFR 273.2(f)(1)(i); 273.2(i)(1), (2), and (4); 273.11(a); and 274.2(b)

Policy: Determine a household's emergency service benefits using:

- All verified information available to you, and
- The best available information for proof that was postponed. This includes information provided by the household such as income and expenses the household declares.

See 7-I, Migrants and Seasonal Farm Workers, for income policies.

# **Emergency Service Processing Time Frames**

Legal reference: 7 CFR 273.2(i)(3), (4), 274.2(b), 441 IAC 65.2(234)

**Policy:** A household eligible for emergency service is entitled to benefits by the seventh calendar day after the date the household submits its application.

#### The chart assumes:

- No holidays fall within the seven days,
- ABC entries were successfully updated in that night's batch process,
- The household needs an EBT card and the EBT card is mailed the next working day (M-F) after ABC entries are made.

## Combined Allotments for Households Entitled to Emergency Service

Legal reference: 7 CFR 274.2(c)(2)

**Policy:** Issue both the initial month's prorated benefits and the next full month's benefits at the same time when a household:

- Files an initial application after the fifteenth of the month, and
- Is eligible for both the initial and following month.

## **Certification Notice and Postponed Verification**

Legal reference: 7 CFR 273.2(i)(4)(iii)(B), 274.2(b)

**Policy:** Certify households who are approved for emergency services with a normal certification period. End the certification period if the household does not provide the postponed verification within 30 days after the application date.

NOTE: If the 30<sup>th</sup> day from the application date falls on a weekend, holiday, or date without regular mail service, the due date must be extended to the next workday.

**Procedure:** Make system entries according to instructions in 14-B(5), Approving an Application and Emergency Services. When you enter the limit date in the LIMIT field, a notice will be issued. This notice tells the household that SNAP will stop if the household does not turn in postponed proof by the 30<sup>th</sup> day from the application date.

If the household fails to provide all postponed proof, the case will automatically close based on the ABC limit date entries. Do not send another notice. The household was already notified that the certification period would end.

If the household provides all proof by the 30th day from the application date, remove the "limit date" entries from the LIMIT field. Make system entries based on the new information if necessary to affect future months' benefits.

- If the case has not closed, the household will continue to receive benefits for the rest of the certification period.
- If the case has already closed, make system entries to reopen and issue benefits for the second or third month, whichever is later. Make the entries:
  - Within five working days of the date verification is provided, or
  - In combined allotments, by the first working day of the second or third month.

## **Public Assistance Households**

Legal reference: 7 CFR 273.2(j), 441 IAC 65.13(2)

Households can apply for SNAP at the same time they apply for public assistance.

Unless the household has indicated that it does not want SNAP, all public assistance applications must be processed as SNAP applications with the same timelines and procedures as other SNAP applicants. If it is unclear if a household that files a public assistance application wants to apply for SNAP, either contact the household or ask during the interview.

Use only SNAP policies to process the SNAP part of a public assistance application. If the public assistance portion of the application is denied, continue to process the SNAP part. A new application is not needed.

## **Single Interview**

Legal reference: 7 CFR 273.2(j)(1), 441 IAC 65.13(3)

When a household applies for both public assistance and SNAP at the same time, hold one interview for all programs. Do **not** make the household see a different IM worker or attend separate interviews for each program. After the interview, separate workers can process the application for the different programs.

Inform households applying for FIP that time limits and other requirements specific to FIP to not apply to SNAP.

## **Verification Procedures and Timeliness**

Legal reference: 7 CFR 273.2(j)(1)

Use SNAP verification procedures for eligibility factors that affect only SNAP. When eligibility factors affect both public assistance and SNAP, you can use the same verification as used for other public assistance. However, if verification is requested you must give the household 10 days to provide it.

If there is enough verification at the end of 30 days to process SNAP but not enough to process public assistance, proceed with determining SNAP eligibility. Do not delay a decision solely to wait for the public assistance information. SNAP time limits still apply to the SNAP part of the application.

## **Emergency Service Screening**

Legal reference: 7 CFR 273.2(k)(1)(i)

The Social Security Administration must screen all applications for possible emergency service on the day it gets the application. SSA will mark "Emergency Processing" on the first page of all applications that appear to be entitled to it.

Screen all applications from the SSA for possible emergency service. Do this on the day the application arrives at the local office.

The SSA tells these households that they may get benefits a few days sooner if they apply directly at the HHS office. The household can take the application from SSA to the HHS office for screening, an interview, and processing.

The seven-day processing time limit begins with the date the local office gets the signed application. However, if the applicant files an SSI and SNAP application before being released from a public institution, the seven days begin with the date of release.

## **Denial of SSI Application**

Legal reference: 7 CFR 273.2(k)(1)(iii)

When SNAP eligibility or benefits may be affected because the SSI part of the joint application was denied, send the household a *Notice of Expiration*. In the notice, advise the household that:

- The certification period will expire at the end of the month after the month the notice is sent;
- The household must reapply if it wants to continue receiving SNAP, and
- The household may be able to have an out-of-office interview.

## **Case Maintenance**

Legal reference: 7 CFR 273.2(k)(1)(iii), and (2)

Households must report changes in circumstances to the HHS local office. See <u>7-G</u> reference for policies and procedures regarding changes. Monitor the results of the SSI determination through SDX and BENDEX. Take any required action within 10 days after learning of the SSI determination. You will get the information from either SDX, the household, the SSA, or from another source.

Restore benefits to the household whenever the local office or the Social Security Administration made an error in joint processing that caused the household to get less SNAP benefits than it should have gotten. See <u>7-H</u> for more information on restoring lost benefits.