



*Commonwealth of Massachusetts  
Executive Office of Health and Human Services  
Department of Transitional Assistance*


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Governor

JOHN W. POLANOWICZ  
Secretary

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Commissioner

**Operations Memo 2014-30  
June 11, 2014**

**To:** Department of Transitional Assistance Staff

**From:**  Lydia Conley, Assistant Commissioner for Policy, Program and External Relations

**Re:** **SNAP: Fault Determination, Proration and Reinstatement for Delayed Applications, Recertifications and Case Maintenance Activities**

**Overview**

This Operations Memo updates Department procedures related to the delayed processing of applications, recertifications and case maintenance activities. When a case is denied or closed and the client returns to the agency seeking benefits within 30 days of the denial or closing, the Department is required to determine the cause of delay in processing and attribute fault either to the Department or to the client.

When the cause of delay is attributed to the Department and the client is otherwise eligible, SNAP benefits must be approved retroactive to the date of application or to the day after the closing date, in the case of a recertification or case maintenance activity. When the cause of delay is attributed to the household and the client is otherwise eligible, SNAP benefits must be prorated from the date the household provides the last missing mandatory verification.

This memo:

- explains how fault is determined and outlines the automation of fault at:
  - application;
  - recertification; case maintenance – Interim Reports (IR);
- discusses overriding a fault determination;

**Purpose of  
Memo  
(Continued)**

- transmits new and revised reports for application, recertification and interim report processing delays to be used by TAO staff and Central Office Management;
  - introduces the BEACON-generated Pending Denial Notice;
  - issues procedures for special processing for automated match process when a case is within an application, recertification or IR mode; and
  - informs staff when to use reinstatement to reopen a case after denial or closing.
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**Automatic  
Determination of  
Fault**

A fault type will be determined in BEACON when a pending SNAP application is denied for *failure to submit the required verifications*, or an active SNAP case is closed for any of the following reasons:

- Failed to keep appointment for review;
- Your certification period has ended;
- Initiated but Failed to Recertify;
- Failure to Complete an Interim Report; and
- Failure to Provide Required Interim Report Verifications.

When an application, recertification, or IR is not processed timely, BEACON will automatically determine and set the Benefit Effective Date based on client and Department activities in the application, recertification or IR processes. BEACON will determine fault based on when the following actions occurred:

- an application date is established;
- a recertification form is received and initiated or not;
- an IR is received and initiated or not;
- an appointment date is established or not;
- an interview is held or not;
- a Notice of Missed Interview (NOMI) is sent or not;
- a verification checklist is sent or not;
- verifications are received or not; and
- the case is wrapped up and authorized in BEACON or not.

The fault reason and classification will be displayed in the Interview Wrap up EBC Results page.

For the automation of fault to work effectively, adhering to application and recertification processing timeframes and entering verifications into BEACON as they are received is critical.

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**Automatic  
Determination of  
Fault at  
Application**

**Department Fault**

If a processing delay at application is determined to be the Department's fault, the Benefit Effective Date will be automatically set to the application date. BEACON will also assign a fault type of Department Delay and one of the following classifications as outlined below:

**No Appointment**

No appointment was scheduled after the application date up to day-30.

**Late Appointment**

The first appointment letter is sent after day-20 from the application date.

**No NOMI**

An appointment date is scheduled to take place on or before day-20, the Interview page is not completed and a NOMI is not sent by day-30.

**No Verification Checklist (VC-1)**

An interview is conducted on or before day-20 and outstanding mandatory verifications are established on the Verifications page, but a verification checklist has not been issued to the client or the VC-1 is late.

**Late Wrap-Up**

All mandatory verifications are submitted by day-30 but the case is not wrapped up by day 30.

**Client Fault**

If the processing delay is determined to be the client's fault, the Benefit Effective Date will be automatically set to the date the last mandatory verification is received. BEACON will set the fault type to Client Delay and will assign one of the following classifications as outlined below:

**No Action**

An interview notice is sent for an appointment to take place on or before day-20. The client misses the interview and a NOMI is sent. The application is subsequently denied for *failure to complete the application process* because the client failed to contact the department after the NOMI was sent.

**Note:** If the client requests SNAP benefits after denial, a new application using the Request for Assistance (RFA) workflow is required.

**Second Appointment Missing Verifications**

The applicant misses the first scheduled interview appointment and a NOMI is sent by day-20. The second scheduled interview appointment is conducted after day-20 but by day-30. On day-30 there is one (or more) mandatory verification outstanding.

**Missing Verifications**

An interview is conducted timely (by day-20). A verification checklist was issued but on day-30, there is one (or more) mandatory verification outstanding because the client has not provided the verification.

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**Automatic  
Determination of  
Fault at  
Recertification**

**Department Fault**

Fault at recertification is determined on the actual closing date (not the BEACON Release date). If the recertification processing delay is determined to be Department fault, BEACON will automatically set the Benefit Effective Date to the day after the closing date and the fault type to Department delay with one of the following classifications outlined below, provided the case was initiated on BEACON timely (i.e., by Federal date\*):

**No Appointment**

No recertification appointment is scheduled (does not apply to IR, BayState CAP or elderly/disabled with no earned income cases).

**No NOMI**

A recertification appointment is scheduled for a date that is at least 10 days before the closing date (i.e., it is timely). The interview is not held and a NOMI is not sent before the closing date (does not apply to IR, BayState CAP or elderly/disabled with no earned income cases).

**Late Appointment**

The recertification appointment is scheduled to take place after the closing date (does not apply to IR, BayState CAP or elderly/disabled with no earned income cases).

**No VC-1**

A recertification appointment is scheduled at least 10 days before the closing date and an interview has been conducted. Mandatory verifications are established as outstanding on the Verifications page but a VC-1 was not sent or sent late.

**Late Wrap-Up**

A recertification appointment is scheduled for a date at least 10 days before the closing date. An interview has been conducted (does not apply to Bay State CAP or elderly/disabled with no earned income cases) and a verification checklist is due by or before the closing date and all mandatory verifications are received by the closing date but the case is not wrapped up and/or authorized by the closing date.

**\*Note:** The date allowed by Federal law is found in the notice on the *Recertification Form* -- sentence starting "Federal law allows you until DATE."

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**Automatic  
Determination of  
Fault at  
Recertification  
(Continued)**

**Client Fault**

When a recertification closes a SNAP case, BEACON will determine client fault based on the following classifications on the closing date:

**Form Not Returned**

The recertification form was submitted after the closing date. This will be treated as a new application and all application rules apply.

**Submitted after Federal Date**

The recertification form was initiated less than 12 days before the closing date.

**No Response After NOMI**

The recertification appointment is scheduled timely. A NOMI is sent (SNAP-only) or *closing for failure to keep reevaluation interview* (combination cash/SNAP applications) is submitted and the client does not respond to the NOMI or the closing notice.

**2<sup>nd</sup> Appointment Missing Verification**

A NOMI is sent after the first scheduled interview is missed. The second interview is conducted less than 10 days from the closing date but by the closing date. There are outstanding mandatory verifications on the closing date so the recertification could not be approved.

**Missing Verifications**

The recertification appointment was scheduled timely, the interview was conducted (does not apply to BayState CAP or elderly/disabled with no earned income) and the client was issued a VC-1 with a due date on or before the closing date, and there are outstanding mandatory verifications on the closing date.

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**Automatic  
Determination of  
Fault at Case  
Maintenance**

**Determination of Fault at Case Maintenance -IR Only**

**When a case is reinstated after an IR closing for *Failure to Complete an Interim Report* or *Failure to Provide Required Interim Report Verifications*, fault will be determined. For IRs, the classifications based on fault type are limited to Department Delay-No VC-1, Client Delay-Missing Verification, and Department Delay-Late Wrap.**

**Determination of Fault at Case Maintenance**

Non-IR case maintenance activities happen at random times and could result from a match or from information obtained from the client. When a case is reinstated after a case maintenance closing (non IR), **fault will not be automatically determined.** The case manager will determine fault based on the date the verification is received and will enter the appropriate Benefit Effective Date accordingly.

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**Overriding the  
Fault  
Determination in  
BEACON**

**Overriding the Fault Determination in BEACON**

When appropriate, a TAO supervisor or manager may override the fault determination in BEACON. For example, if a client has submitted verifications timely, but the case is being processed after the recertification has closed, SNAP benefits must not be prorated. When reopening the case, the case manager will see that BEACON has already set the fault reason to Client Fault - Missing Verifications and the Benefit Effective Date to the date the last missing mandatory verification was entered.

In this situation, a supervisor or manager must override the client fault determination by clicking on the Override checkbox on the Interview Wrap up/EBC Results Update tab. This will enable the supervisor or manager to change the Benefit Effective Date to the day after the closing date and prevent the case from being prorated in error. The original fault determination and classification displayed in Interview Wrap up will not change so the supervisor or manager must make an entry on the Narrative tab explaining the reason for the override.

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**Reports**

**Untimely SNAP (Re)Application Detail and Summary Report**

A new 'Untimely SNAP (Re)Application Detail and Summary Report' will be created in Actuate. The report will:

- include SNAP cases that became active during the subsequent 30 days and have a fault determination;
- be produced monthly on the third business day of the month; and
- be sorted by case manager within supervisory unit within each TAO.

The fields on the Detail Report are: Grantee SSN, Grantee Name, Fault Determination, Classification, Application Date, Benefit Effective Date and Override Indicator. The fields on the Summary Report are: Counts by Supervisory Unit and Counts by Case Manager.

**Untimely SNAP Reevaluation Detail and Summary Report**

A new 'Untimely SNAP Reevaluation Detail and Summary Report' will be created in Actuate. The report will:

- include SNAP cases that had a completed recertification and have a fault determination;
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**Reports  
(Continued)**

- be produced monthly on the third business day of the month; and
- be sorted by case manager within supervisory unit within each TAO.

The fields on the Detail Report are: Grantee SSN, Grantee Name, Fault Determination, Classification, Closing Date, Recertification Complete Date, Benefit Effective Date and Override Indicator. The fields on the Summary Report are: Counts by Supervisory Unit and Counts by Case Manager.

Both reports will be placed in the TAO Staff Detail Report folder in Actuate.

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**The BEACON-  
generated  
Pending Denial  
Notice**

The Pending Denial Notice (Attachment A) will be generated by BEACON effective with BEACON Build 46.3 scheduled for Monday, June 16, 2014. A Pending Denial Notice will be automatically generated in batch when verifications are requested and there are less than 10 days left in the 30-day application timeframe. The case manager will be unable to generate a VC-1 online after day-20 for SNAP cases. A VC-1 may be generated online for a cash case prior to day 22.

The due date of the Pending Denial Notice will be automatically set by BEACON as 60 days from the date of application. The Pending Denial Notice will include items newly requested by the case manager and verifications associated with the application and which are still outstanding on the date the form is generated. The creation of a Pending/Denial Notice on a case excludes that case from the day-30 automatic batch denial process.

When a Pending Denial Notice is generated on a case, the case is not denied so fault will not be automatically determined. When the case is being processed between day-31 and day-60, the case manager must enter the appropriate Benefit Effective Date based on whether the delay is attributed to the Department or the client.

SNAP households that receive a Pending Denial Notice will be identified on the Tompkins Report. Case managers must not deny these cases on BEACON on day-30 for *not completing the application process* as the due date is now 60 days from the date of application. On day-60, a special batch job will automatically deny the case in BEACON for *failure to provide the required verifications*. No additional notice will be sent to the household.

If a second Pending Denial Notice is sent because additional verifications were requested, the due date will also be 60 days from the date of application. If a Pending Denial Notice is generated after day-50, the due date will be 10 days from the date the notice is generated. Generating a Pending Denial Notice after day-50 is expected to be rare.

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**The Automated Match Process on Applications, Recertifications and IRs**

The Program Integrity Checklist applies to all pending applications.

The match process will apply to existing SNAP households based on the certification type of the household, the type of match and when during the certification period the match appears on the case.

Details about match functionality for applications and recertifications are provided in Operations Memo 2014-36, Program Integrity (PI) Checklist BEACON Integration – Phase 2, and Other Enhancements to Processing External Agency Matches.

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**When to Reinstatement a SNAP Case after Denial or Closing**

**1. Reinstatement Within 30 Days of SNAP Application Denial**

When a case is denied for *failure to provide the required verifications*, the case manager must use Reinstatement page functionality to open the case if verifications are provided in the 30-day period subsequent to denial. If the case was denied for a categorical financial or nonfinancial reason (e.g., the household is over income or does not meet student requirements), however, the case cannot be reinstated. The client must reapply for benefits and the case manager must complete the Request for Assistance (RFA) workflow.

To open a case within 30 days of denial using Reinstatement, the case manager must:

- Select the Workflow tab and on the Workflow dropdown menu, click on Reinstatement;
  - Next to each household member's name there is a checkbox. Select all to be reinstated;
  - Click on Save;
  - Complete all required pages in the workflow;
  - Enter verifications received on the Verification tab;
  - On Interview Wrap up page, (the Benefit Effective Date field will populate with a date based on the fault reason previously determined at denial); and
  - Wrap up the case and submit to supervisor for approval.
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**When to  
Reinstate a  
SNAP Case after  
Denial or Closing**

**2. Reinstate a Case on or before Recertification Closing Date - After BEACON Release Date but Wrapped up on or before actual Closing Date**

When a recertification closes for a BEACON-generated, timely case closing reason and a client submits a recertification form after the BEACON release date but before the closing date (end certification period), the case manager must:

- Click on Reinstate;
- Enter the new *Form Received* date on the Reinstatement page;  
**Note:** If the client comes to the TAO, does not provide a form but signs the form the case manager prints from BEACON after the interview, the *Form Received* date would be the date of that in-office interview.
- Click on Save (When the Reinstatement page is saved, BEACON will automatically initiate a Recertification using the *Form Received* date as the initiated date);
- Complete all required pages and make changes based on information received in the recertification process;
- Issue a VC-1, if necessary. The due date on the VC-1 will be 30 days from the closing date;

*Verifications are received prior to closing date*

- Submit the recertification;  
(On the Interview Wrap up page, the Benefit Effective Date field will be blank. Fault will not be determined because although late, the recertification requirements were met by the closing date);
- Enter the client's next cyclical issuance date (day after closing date) as the Benefit Effective Date; and
- Wrap up the case and submit to the supervisor for approval.

**3. Reinstate a Case after Recertification Closing - Reinstate After BEACON Release Date and Wrapped Up after Closing Date**

When a recertification closes for a BEACON-generated, timely case closing reason and a client submits a recertification form after the BEACON release date but provides verifications after the actual closing date (end certification period), to complete the recertification, the case manager must:

- Reinstate case and enter *form received* date;
  - Click on Save;  
(When the Reinstatement page is saved, BEACON will automatically initiate a Recertification using the *Form Received* date as the initiated date);
-

**When to Reinstatement a SNAP Case after Denial or Closing**

- Issue a VC-1, if necessary. The due date on the VC-1 will be 30 days from the *Form Received* date;
- Complete all required pages and make changes based on information received in the recertification process;

*Verifications are received*

- Submit the recertification; and
- Wrap up the case and submit to supervisor for approval (the Fault Reason and Classification will be displayed in Interview Wrap up. The Benefit Effective Date will be set by BEACON based on fault reason).

**Important:** As stated on page 5 of this memo, if a recertification form is returned after the case closing date (not to be confused with the BEACON release date), this will be treated as a new application and all standard application rules apply.

#### **4. Reinstatement a Case After IR Closing**

Reinstating after an IR closing parallels the process for reinstatement following a recertification closing. To reinstate an IR after closing follow the instructions for:

- Reinstatement Within 30 Days of Recertification Closing - After BEACON Release Date but Wrapped up before Closing Date;
- or
- Reinstatement a Case after Recertification Closing - After BEACON Release Date and Wrapped Up after Closing Date, outlined earlier in this memo.

**Exception:** When an IR closes for *Failure to Complete an Interim Report* and the **IR is submitted after the closing date but within 30 days of closing, the case must be reinstated and proration applies**. The Fault Reason and Classification applicable to IRs will be displayed in Interview Wrap up and the Benefit Effective Date will be set by BEACON based on fault reason. The original Annual Reporting certification period is unchanged for a reinstated IR.

#### **5. Reinstatement After Case Maintenance Closing (Non IR)**

When a case closes outside of an application, recertification or IR mode, and the client submits the final verification within the 30-day period following the closing, the case must be reinstated in BEACON. A new application is not required. Reinstatement of cases closed during case maintenance is available for all closing reasons. Fault reason and classification are not automatically determined for case maintenance closings (except for IRs) and the Benefit Effective Date will not be preset. Instead, it will be blank. Case managers must enter the appropriate Benefit Effective Date based on the date the required verification is received.

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**When to Reinstatement a SNAP Case after Denial or Closing (Continued)**

**6. Reinstatement of Combination Cash/SNAP Applications or Recertifications**

*After Application Denial*

- Reinstatement the SNAP case by following the instructions under Reinstatement Within 30 Days of SNAP Application Denial found earlier in this memo; and
- Reinstatement the cash case back to the date of application or back to the day after closing as appropriate.

*After Recertification/Reevaluation Closing*

- Reinstatement the SNAP recertification by following the applicable instructions under:
  - Reinstatement within 30 Days of Recertification Closing - Cases reinstated after BEACON Release Date and wrapped up by closing date; or
  - Reinstatement within 30 Days of Recertification Closing - Cases reinstated after BEACON Release Date and wrapped after closing, found earlier in this memo; or
- Reinstatement the cash case back to the day after closing.

For a helpful list outlining when to reinstate versus when to complete RFA, see Attachment B.

On day-30, deny the recertification for *failure to keep appointment for a review* or *fail to submit the required verifications*, as appropriate. On day-30, deny IR for *fail to submit the required verifications*.

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**Policy References**

SNAP: 361.900-930; 106 CMR 361.700; 364.120; 366.300; 366.340.

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**Questions**

If you have any questions, please have your Hotline designee call the Policy Hotline.

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DTA                    CAN 999  
P.O. Box 4406  
Taunton, MA 02780-0420

Important Notice - Read Carefully  
Este Mensaje Es Importante - Lea Cuidadosamente

**Massachusetts Department of Transitional Assistance**

Mary Jones  
101 Main Street  
Somerville, Ma 02148

Agency ID: 9999999  
Chelsea Center TAO - DTA

Date: 04/22/2014

Dear Mary Jones:

We are still processing your Supplemental Nutrition Assistance Program (SNAP) application, but we need you to verify the item(s) listed at the end of this notice.

Your application will be denied without further notice if we do not receive the required verification(s) by 05/31/2014.

If you provide all the required verifications by 05/31/2014, you do not have to reapply for benefits.

If you do not provide all required verifications by 05/31/2014, you will have to reapply for SNAP benefits if you want them.

**Please let us know if:**

- You think we already have your verifications.
- You need help getting your verifications.
- There is a good reason why you didn't turn in your verifications.
- You have a disability or health problem that makes it hard to get your verifications.

**If you need assistance, please call:**

- Your case manager John Smith at 617-999-9999 if you have any questions about your case or you think you may have a disability that requires special accommodations; or
- Recipient Services at **1-800-445-6604** if you have trouble reading or understanding this notice.

You are entitled to food stamp benefits, if eligible, without regard to age, race, color, sex, handicap, religious creed, national origin, or political beliefs. If you believe that the Department, in making your eligibility determination, has discriminated against you, contact your local Transitional Assistance Office to find out how you can file a complaint.

PENDNIAL

9999999

To ask about free legal services, call: Greater Boston Legal Services at 800-323-3205.

The regulations we used in the decision are 106 CMR 361.930. You can find our regulations on the Internet at [www.mass.gov/dta/regulations](http://www.mass.gov/dta/regulations).

**You must mail your verifications to: DTA, P.O. Box 4406, Taunton MA 02780-0420. Please include your name and your Agency ID 9999999 on every page of the documents you submit.**

If you disagree with this decision you have the right to a fair hearing. The reverse side of this notice contains important information about your hearing rights. To request a hearing, complete the reverse side of one copy of this notice.

**If you have trouble reading or understanding this notice, please feel free to call Recipient Services at 1-800-445-6604. We can help explain it to you.**

### Your Verification Checklist

PROOF OF WHO YOU ARE	
What You Need to Prove for	Examples of Proofs You May Provide
SNAP	
<b>Identity</b> For whom: Mary Jones	Driver's license, birth certificate, hospital birth record, court records, or other official government documents.
<b>Date of Birth</b> For whom: Mary Jones	Driver's license, birth certificate, hospital birth record, court records, or other official government documents.
<b>Social Security Number</b> For whom: Mary Jones	Tell us the Social Security number of your household member(s) or show that you have applied for a Social Security number for all household members applying for benefits.

## SNAP: When to Reinstate, Prorate or Complete RFA

Activity	Between Day-31 and Day 60	Activity Summary
<p><b>Application</b> received but client not interviewed by day-30 or client is interviewed but provides verification after 60. Client subsequently requests SNAP.</p>	<p>A new application is required. Case Manager must complete Request for Assistance workflow (RFA).</p>	<p>RFA. New App.</p>
<p><b>Application</b> is received. Verifications are provided between day 31 and day-60.</p>	<p>A new application is not required. Case must be reinstated. Proration applies.</p>	<p>Reinstate/Prorate</p>
<p><b>Recertification is</b> form received late but before closing date. Verifications received by closing date.</p>	<p>A new application is not required. The case must be reinstated. <b>Proration does not apply.</b></p>	<p>Reinstate/Do not Prorate.</p>
<p><b>Recertification is</b> form received timely. Verifications provided between day 31 and day-60.</p>	<p>A new application is not required. Case must be reinstated. Proration applies.</p>	<p>Reinstate/Prorate</p>
<p><b>Recertification is</b> form received after closing date.</p>	<p>A new application is required. Case Manager must complete Request for Assistance workflow (RFA).</p>	<p>RFA. New App.</p>
<p><b>IR</b> form is received late but before closing date. Verifications by closing date.</p>	<p>The case must be reinstated. <b>Proration does not apply.</b></p>	<p>Reinstate/Do not Prorate</p>
<p><b>Interim Report (IR)</b> is received timely. Verifications provided between day 31 and day-60.</p>	<p>The case must be reinstated. Proration applies.</p>	<p>Reinstate/Prorate</p>
<p><b>IR</b> is received after closing date.</p>	<p>The case must be reinstated. Proration applies. A new application <b>is not</b> required.</p>	<p>Reinstate/Prorate</p>
<p><b>Case maintenance (non IR)</b> activity. Verification is provided late but within 30 days of closing.</p>	<p>A new application <b>is not</b> required.</p>	<p>Reinstate/Prorate</p>