



Department of Human Services  
311 West Saratoga Street  
Baltimore MD 21201

**FIA ACTION TRANSMITTAL**

**Control Number: #21-04**

**Effective Date: Immediately**

**Issuance Date: July 31, 2020**

**TO: DIRECTORS, LOCAL DEPARTMENTS OF SOCIAL SERVICES  
DEPUTY/ASSISTANT DIRECTORS FOR FAMILY INVESTMENT  
FAMILY INVESTMENT SUPERVISORS AND ELIGIBILITY STAFF**

**FROM: NETSANET KIBRET, EXECUTIVE DIRECTOR**

**RE: PREVENTING QUALITY CONTROL ERRORS FOR CLOSINGS AND DENIALS**

**PROGRAM AFFECTED: SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP)**

**ORIGINATING OFFICE: OFFICE OF OPERATIONS**

**SUMMARY:**

On October 1, 2011, The Food and Nutrition Service (FNS) changed the way Quality Control (QC) must review denials and closures of the Supplemental Nutrition Assistance Program (SNAP) cases. Previously, QC reviewed negative actions based on the effective date of the action. This meant that if an incorrectly closed case was reopened and issued benefits back to the beginning of the month, QC was able to declare that improper closure to be “not subject to review”. In other words, no error occurred because there was no break in benefits. QC reviews are now based on the “action date”, which is the very day the case manager made the decision to deny or close the case. This has resulted in more negative actions being subject to a review. AT: 12-16 now obsolete.

Examples of invalid closures and denials now include:

- Cases that close or are denied when the agency has received the customer information but did not act timely;
- Cases that are closed or denied using the wrong three-digit CARES “reason code” for denial or closure (such as the use of a 552 code for a customer who did not show up for an interview, instead of using 566 or 365 for auto-denials);
- Cases that close with closure code 552 when the customer has not provided the requested information. The Case Manager should allow the case to close with CARES generated code 230;

- Applications that are denied more than 60 days after the date of application;
- Applications that are not properly pending in CARES on the day the customer appeared or filed the application; and,
- Cases in which the certification period is shortened inappropriately;
- The notice lists multiple reason codes (361/365) and only one reason is valid;
- The notice did not list a specific denial reason;
- Additional free form text did not specify the eligibility requirement not met.

QC is no longer allowed to conduct an “expanded review”. That means QC cannot find another reason to justify a denial or closure.

**ACTION REQUIRED:**

It is very important that all case managers:

- Use the correct 500-level denial or closing code on CARES;
- Allow customers adverse action when putting N in a verification field that triggers the closing code 230 and add free form text;
- Code individual CARES screens accurately so that the correct auto-denial and auto-closure codes will post (such as entering a “Y” in the ‘Out of State’ field for SNAP on the DEM1 screen when the customer receives SNAP benefits from another state in the application month);
- Allow customers a minimum of 10 days to provide verification and a 10-day adverse action period prior to closure;
- Compare the address on CARES to the address on the customer’s application to ensure that mail is sent to the correct address;
- Schedule an appointment with a specific date and time and send a NOMI if the customer fails to appear;
- Verify income at application unless the customer is eligible for Expedited service;
- Verify customers declared expenses for rent, utilities, and childcare to allow the deduction. If the customer does not return the verification, process the case without the deduction;
- Postpone verification, except for identity, if the customer is otherwise eligible for Expedited service;
- Make a decision on all applications no later than the 60<sup>th</sup> day because a denial after the 60<sup>th</sup> day of pending is automatically invalid;
- Review the soft edit on the STAT screen that asks “Are You Sure You Want To Deny AU Prior to 30<sup>th</sup> Day from Date of Application?” to prevent early denials;
- Ensure that a copy of any notice that was issued manually is uploaded into ECMS;
- Narrate the reason for an adverse action and the facts that support the decision;
- Narrate the results of screening for Expedited service;
- Narrate when a letter is sent from Expressions;

- Narrate on CARES the reason a notice was not required when choosing to suppress the automated CARES notice.

**INQUIRIES:** Please direct Quality Control inquiries to Ann Pope at 410 767-7769 or [ann.pope@maryland.gov](mailto:ann.pope@maryland.gov). Please direct policy questions to FIA Policy by completing the FIA Policy Information Request Form found on Knowledge Base as shown in the screenshot below or email to [fia.policy@maryland.gov](mailto:fia.policy@maryland.gov).

The screenshot displays the DHS Knowledge Base website for the Family Investment Administration. The header includes the DHS logo and navigation links for Administrations, Tools, Resources, Links, and Local Offices. A search bar is present below the header. The left sidebar contains a list of navigation options, with 'Family Investment Administration' and 'Contact us with your FIA Program Eligibility Policy Question' circled in red. The main content area is titled 'Family Investment Administration' and contains a detailed description of the program's scope and services. Below the text are two data boxes: 'FFY 2017 Job Placement Data Statewide Annual Goal Total' with a value of 13,021, and 'FFY 2017 Job Placement Data Statewide Annual Achieved Total' with a value of 12,240. On the right side, there are two contact cards for staff members: Labelle Hillgrove, MSOL (Director, Office of Statewide Policy Compliance and Customer Service Performance) and Candice A. Roberts (FIA Executive Assistant). A 'Tools' button is located at the bottom right of the page.

cc: FIA Executive Staff  
 FIA Management Staff  
 Constituent Services  
 Help Desk