



**MARYLAND DEPARTMENT OF
HUMAN SERVICES**
 Department of Human Services
 311 West Saratoga Street
 Baltimore MD 21201

FIA ACTION TRANSMITTAL

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

FROM: LA SHERRA AYALA, EXECUTIVE DIRECTOR, FIA
DEBBIE RUPPERT, EXECUTIVE DIRECTOR, MDH/OES

RE: CURRENT REDETERMINATION STATUS

OFFICE: OFFICE OF PROGRAMS

**PROGRAMS AFFECTED: SUPPLEMENTAL NUTRITION ASSISTANCE
 PROGRAM (SNAP), TEMPORARY CASH ASSISTANCE (TCA), TEMPORARY
 DISABILITY ASSISTANCE PROGRAM (TDAP), NON- MAGI MEDICAL
 ASSISTANCE AGE BLIND DISABLED (ABD)**

SUMMARY

The Family Investment Administration (FIA) effectively resumed redeterminations on April 1, 2021. Since then, we have issued numerous guidelines based on changing federal policies. This Action Transmittal (AT) provides important reminders regarding our current and future redeterminations in CARES and Eligibility and Enrollment (E&E) systems. The procedures outlined in this AT are based on the current redetermination waiver and other temporary policies approved by our federal partners. The waiver is tied to the existence of a State-issued emergency declaration as well as an active National Public Health Emergency (PHE). FIA will issue a new or an updated AT when the redetermination waiver expires and/or any of the related federal policies change.

NEW UPDATES

SNAP, TCA, and TDAP Type 2 Redeterminations

After consultation with federal partners and agency leadership, the following changes have been made:

- August Redeterminations and Prior Months

- August redetermination packets were sent to customers in the month of June.
 - Redeterminations that were received prior to this AT were processed and updated according to regular eligibility rules.
 - Effective immediately and until further notice, any redetermination returned by the customer should be treated as an interim change.
 - Any redetermination that is due but is not completed by the worker by the due date will be automatically extended.
- September-December 2021 Redeterminations
 - Redetermination notices for September through December have been suppressed and were not mailed to customers. This means that LDSS should not be receiving redeterminations for those months. If a customer chooses to submit a redetermination on his or her own, the worker should treat the information received as interim changes.
 - TCA and TDAP Type 2 redeterminations that are due in September through December 2021 will be automatically extended for a year.
 - SNAP redeterminations that are due in September through December 2021 will be extended in E&E and CARES at the end of each month. CARES will do an end of the month extension and E&E will move all of the redets at one time.

**In E&E July redeterminations were prematurely updated prior to the end of the month through December 2021.* In coordination with MD THINK, these redeterminations will be extended through January 2022, and the ability to update an extended redetermination will be restored.*

Medical Assistance Redeterminations

The Centers for Medicare and Medicaid Services (CMS) issued multiple extensions of Medicaid eligibility during the Public Health Emergency (PHE). As a result, DHS had many MA redeterminations that were due in September 2021. In an effort to balance the caseload, our E&E and CARES teams evenly distributed our MA redeterminations starting in September 2021 through March 2022. On June 9, 2021, the Maryland Department of Health (MDH) notified DHS that redeterminations previously extended through September 2021 must be extended through December 2021. Please note, MA redeterminations will continue to be mailed to customers and should be processed if the customer returns the packet. The jurisdictions that remain in CARES should continue to code "CO" in the CARES special circumstances field for any redetermination or interim change that has remained open during the PHE that would have been otherwise closed ([See SOP 20-05](#), revised May 12, 2021.)

Medical Assistance Post-Pandemic Planning

Per current guidance from CMS, the Public Health Emergency (PHE) is likely to end December 31, 2021. In its guidance, CMS advised States to send notices to households whose eligibility is being extended due to the PHE. This notice is called the "Advanced Notice," and it puts the household on notice that its eligibility (or that of one or more members) would otherwise end but is being extended until the end of the PHE. Sending this new notice helps customers understand that they need to update their household circumstances if they change. It will allow for the automated closure of those cases during the months following the end of the PHE without case managers having to redetermine eligibility if the notice was sent for case actions that occurred within the six months prior to the end of the PHE. Here's an example:

Example 1:

The customer submits a redetermination packet for an August 2021 (QMB). The customer reports they are now receiving an additional pension. With this additional pension, they would now be over the income limit for QMB. This customer's information would be updated, and the Eligibility & Enrollment system (E&E) would send an Advanced Notice to them, informing them that their case has remained open only due to the PHE and will be closing once the PHE has ended. In February 2022 this case, if no other changes or reduction in income was reported between August 2021 and February 2022, would automatically close on February 28, 2022 with no case action required by the case manager. The eligibility system will send out a Notice of Adverse Action (Cancel Notice) 10 days before the end of the month.

Example 2:

The customer was sent a redetermination packet for their August 2021 (QMB) program but did not return the redetermination packet. This case will be flagged, and E&E will send an Advanced Notice informing them that their case has only remained opened due to the PHE and will be closing once the PHE has ended. In February 2022, this case, if no other changes were reported or redetermination packets were returned between August 2021 and February 2022, would automatically close on February 28, 2022 with no case action required by the case manager. The eligibility system will send out a Notice of Adverse Action (Cancel Notice) 10 days before the end of the month.

The Advance Notice has been implemented into E&E effective August 2, 2021 and can be viewed in your correspondence history. Maryland Health Connection has sent Advanced Notices since April 2021 under the same rules for Modified Adjusted Gross Income (MAGI) Medicaid cases. However, it has not been implemented in CARES. CARES counties MUST continue to code the Special Circumstances field on the ADDR screen as "CO" on the address screen if the only reason the case was kept open is the PHE. If these cases are coded properly, once the cases are converted in E&E, the new system will be able to send Advanced Notices for actions during the months following conversion.

REQUIRED ACTION

We recognize that there have been many changes in our redetermination processes during the Public Health Emergency. This means some customers are receiving packets, some are extended and will receive packets later, and some customers may just submit a packet online even if a redetermination is not yet due. With these unique circumstances please handle according to the instructions below:

SNAP, TCA, and TDAP Type 2

- Effective immediately, upon receipt, all redetermination packets that are received will be treated as an interim change.
- SNAP, TCA, and TDAP redeterminations received **DO NOT** need to be initiated.
- For SPM counties, these interim changes (redet packets) will not be addressed in SPM and will be addressed by the home jurisdiction. For tracking purposes SPM counties may use their Google sheets to track these changes.
- Review the redetermination packet to see if the customer reported any changes in their household, income or change of address/phone number.

- If a change is reported, the case manager should run clearances only if the customer did not provide verification and the details can be found via clearances. The case manager will issue a 1052 only if he or she is unable to verify the details in the clearances.
- For current redeterminations that have outstanding 1052's, please update the changes upon receipt.
- Please ensure to narrate whether a packet was received and whether or not the customer reported changes. All documents received by the customer must be uploaded into ECM.

Medical Assistance

- Medical Assistance redeterminations will continue to be sent to customers. When returned, MA redeterminations should be handled according to current business procedures ([See SOP 20-05](#), pages 6 and 9). These packets must be reviewed for processing.
- MA redeterminations packet **MUST** be initiated in either CARES or E&E, whichever is appropriate for your jurisdiction.
- Effective August 2, 2021 in E&E, the system will allow you to input the current income and resources. Adding the income and resources will not render the customer ineligible, even if they are income overscale. The system will allow the changes to be updated and send the customer a letter informing them the redeterminations have been updated. These customers will also receive Advanced Notice explaining that the case will close after the PHE ends.
- In CARES, if the customer is not eligible, continue to you're the existing workarounds to allow the MA case to remain open and code the Special Circumstances field on the ADDR screen as "CO".

INQUIRIES:

For SNAP, TCA and TDAP policy questions, direct them to the Office of Statewide Policy Compliance and Customer Service Performance by completing the [FIA Policy Information Request Form](#) found on Knowledge Base.

For MA policy questions: Direct Non-MAGI policy questions to the Maryland Department of Health, Office of Eligibility Services at mdh.oesinquiries@maryland.gov. Direct MAGI policy questions to mdh.mchppolicy@maryland.gov.

For systems questions, please email fia.bsdm@maryland.gov.

cc: DHS Executive Staff
 MDH Executive Staff
 FIA Management Staff
 Constituent Services
 Office of Administrative Hearings