DHS MARYLAND DEPARTMENT OF HUMAN SERVICES **Department of Human Services** **311 West Saratoga Street** **Baltimore MD 21201**	**FIA ACTION TRANSMITTAL**
Control Number: #22-11	**Effective Date: January 1, 2022** **Issuance Date: January 5, 2022**

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

FROM: **LA SHERRA AYALA, EXECUTIVE DIRECTOR**

RE: **DISCONTINUATION OF INTERVIEW WAIVERS**

PROGRAM IMPACTED: **SUPPLEMENTAL NUTRITION ASSISTANCE**
                                  PROGRAM (SNAP), TEMPORARY CASH
                                  ASSISTANCE (TCA), TEMPORARY DISABILITY
                                  ASSISTANCE PROGRAM (TDAP), PUBLIC
                                  ASSISTANCE TO ADULTS (PAA)

ORIGINATING OFFICE: **OFFICE OF OPERATIONS**

SUMMARY

Effective January 1, 2022, interviews will be required for all Supplemental Nutrition Assistance Program (SNAP) and Cash applications including the issuance of expedited SNAP benefits. For applications received on and or after January 1, 2022, an interview must be completed prior to the issuance of benefits. Interviews are required for all applications and recertifications ending January 31, 2022, and thereafter.

During the pandemic, the Maryland Department of Human Services Family Investment Administration (DHS/FIA) exercised Interview Waivers authorized by federal laws and flexibilities tied to the State-issued emergency declaration. The Maryland State of Emergency (SOE) ended August 15, 2021, as a result the Interview Waivers ended December 31, 2021.

Case Managers must complete an interview prior to issuing SNAP (including Expedited SNAP), CASH, and PAA applications. Interviews must be scheduled in the Enrollment & Eligibility

(E&E) system.

Reference: AT #21-05 "Using Telephone Interviews As The Preferred Interview Method".

Expedited SNAP

Effective January 1, 2022, Maryland can **no longer postpone the required interview prior to issuing SNAP expedited benefits**. All other expedited criteria and processing procedures still apply.

Eligibility Workers are expected to review each SNAP application the agency receives within 24 hours of receipt and confirm if the customer meets the expedited criteria. If the expedited criteria are met, the Eligibility Worker must process the application and ensure the SNAP benefits are made available to the customer's EBT card on or before the 7th day. If the expedited criteria are not met, the SNAP application will remain pending until mandatory verifications are received on or before the 30th day of the application.

Reference: SNAP Manual Section 401.2 Expedited Service Criteria

POLICY HIGHLIGHTS:

- If a household does not complete the interview by the 7th calendar day, the benefits **cannot be issued** within the established expedited service time frames. **The Expedited SNAP must remain pending**. The application must be processed within the normal 30 days of the date of application, in accordance with 7 CFR 273.2 (FNS- GD- 2006-011) of the rules.
  - There are future enhancements to correct the E&E identified resource policy and failure to complete interview discrepancies.
- The case manager must make every attempt to complete the interview prior to the 6th day.
- The appointment should be scheduled no later than the fifth day from the date of application. Interviews must be scheduled using the Enrollment & Eligibility (E&E) system. Notices must go out by mail.
  - Customers who apply for benefits using the consumer portal (i.e myMDTHINK) will receive their appointment notification via the mail, an alert within the consumer portal and a direct email to the email used to create the account.
    - Reference: IM: #22-08 "Redetermination Processes And Interviews In The Eligibility And Enrollment (E&E) System".
  - Customers who apply using a paper application will receive notification via mail. However, as best practice, if an email is provided by the customer, please use it to inform the customer of their upcoming scheduled appointment date and time.
- Case managers must take into account holidays and weekends. Therefore, if the seventh calendar day falls on a weekend or holiday, the application must be processed **before** the holiday or weekend.
- Contact the customer via telephone to conduct the interview. If no telephone number is provided on the application the interview method should be in person when scheduling

the interview.
- The appointment notice will display the DHS Call Center number 1-800-332-6347 as the preferred way for a customer to communicate with the LDSS if they missed an interview or need to reschedule an appointment.

Note: For shelter and dependent care deductions to continue past the expedited month(s) the household will need to provide verification. If the household fails to do so, remove the deductions the second month.

Reference: AT: #20-13 (Revised) "Verification For Shelter And Dependent Care Expenses"; SNAP manual section 212 Deductions

REMINDER: The only mandatory verification for the expedited processing timeframe is proof of identity.

- Upon secondary screening or interview, if it is discovered the household now meets the expedited processing criteria due to a change in their circumstances (the date of discovery), the date the case manager discovers the household is eligible for expedited processes is counted as day one of the seven calendar days expedited processing timeframe.

To ensure the agency meets the "opportunity to participate" time frame, be sure to inquire during the interview whether or not the customer has access to a previous EBT card or is in need of a new EBT card.

Application Missed Interview:

The interview must be completed before SNAP or CASH benefits can be issued. If a customer fails to complete the interview process, the case manager must:

1. Code the Interview as Missed
2. Preview and confirm a system generated NOMI is regenerated by the system
3. Narrate all the case management actions completed
4. Code the case as a Client Delay or Agency Delay, whichever applies

Code missed appointments appropriately as either Client Delay or Agency Delay:

- Administrative Information - failure to code an untimely case defaults to AD (non-Agency Delay coding **must be valid and supported by narration and timely action by jurisdiction**)

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- Confirm Eligibility

- Verifying change in case status - Application Status reports update every 3 hours. (Supervisor)

Case Status:
- **The Expedite case will remain pending for 30 days. Future enhancement in progress to auto deny expedited cases were an interview is missed.**

Reference: IM: #22-08 "Redetermination Processes And Interviews In The Eligibility And Enrollment (in E&E) System"

Do not delay processing an application or redetermination for non mandatory verifications. Once the 1052 has been sent and the customer does not return non mandatory verifications, please process the case and mark the non mandatory verifications as not verified.

Example: Application received January 3, 2022. Interview conducted January 5, 2022. At the time of application the customer's identity and citizenship had previously been verified. The customer submitted income verification with the application and or redetermination application. The customer discloses they pay shelter expenses and child care. The customer is provided a 1052 for the deductions. On January 18, 2022, the case was reviewed to determine if the verification of the deductions were received. No verification of the deductions found. All

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the required verifications were received and the customer was given 10 days to return the deduction verification. **The case should be processed immediately, marking the deductions as unverified.**

Reference: SNAP Verification Reference Chart issued with AT# 20-13.

Action Required: How to Schedule an Interview

There are two methods that a case manager can schedule an interview from the Application Disposition screen and/or from the Taskbar once the application registration is completed. The first method is used only for new application interviews as redetermination applications are automatically scheduled. The second method may be used for both application and redetermination interviews when a case manager wants to update a missed interview or when rescheduling an interview.

Method 1: From the Application Disposition Screen

After the application has been registered, E&E will take you to an Application Disposition screen with a schedule book on the right-hand side.

Screenshot #1
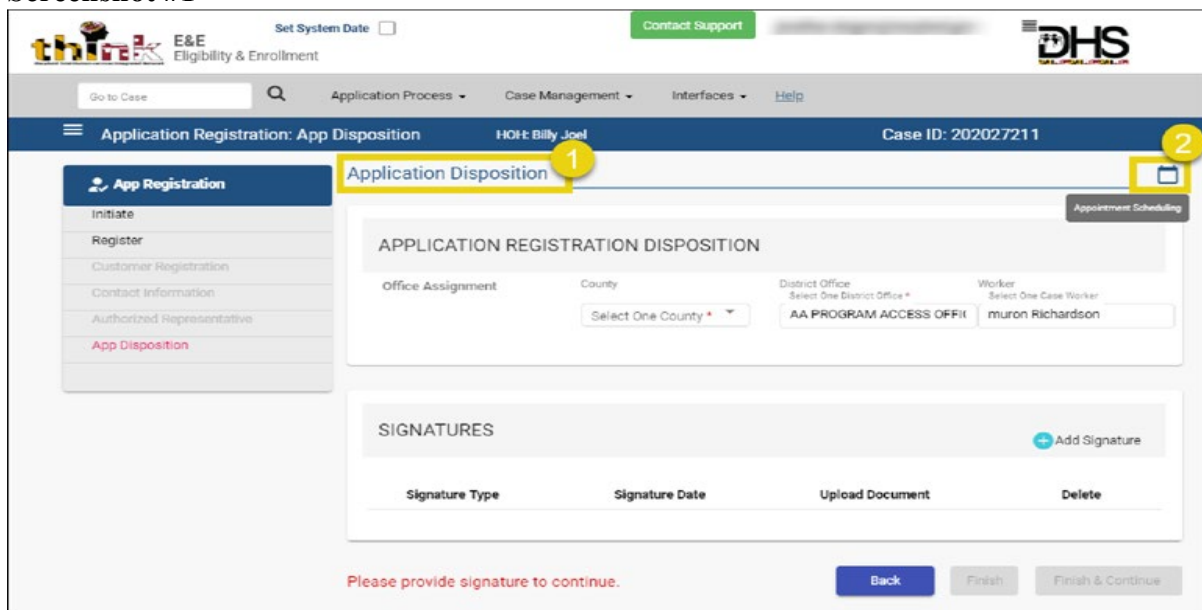
The schedule window will appear, and you will select the programs that are needed for the interview. The interview should cover all programs that the customer has applied to for assistance. The case manager will select the date and whether a telephone or in person (i.e face to face) interview is being scheduled. A telephone interview is always the preferred method

unless a face-to-face interview has been requested by the customer.

Screenshot #2
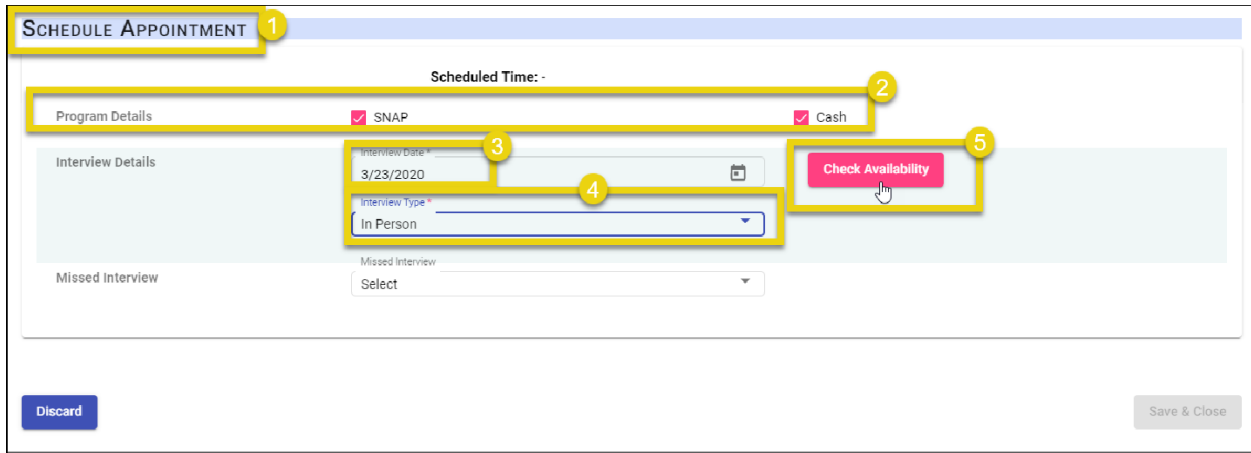
Available time slots will be displayed in two-hour increments in the scheduling feature. The How-to Guide in E&E (also attached below) has not been updated to reflect the two-hour increments for scheduling, but the system has been updated to two-hour increments. The two-hour increments will be every 30 minutes, ex: 8:30-10:30, 9:00-11:00, 9:30-11:30, etc. based on the local office capacity according to E&E logic at this time. Once a local has reached its capacity during a certain date and time frame, the local office will not be able to schedule any more interviews for it, unless a ticket is submitted.

Screenshot #3
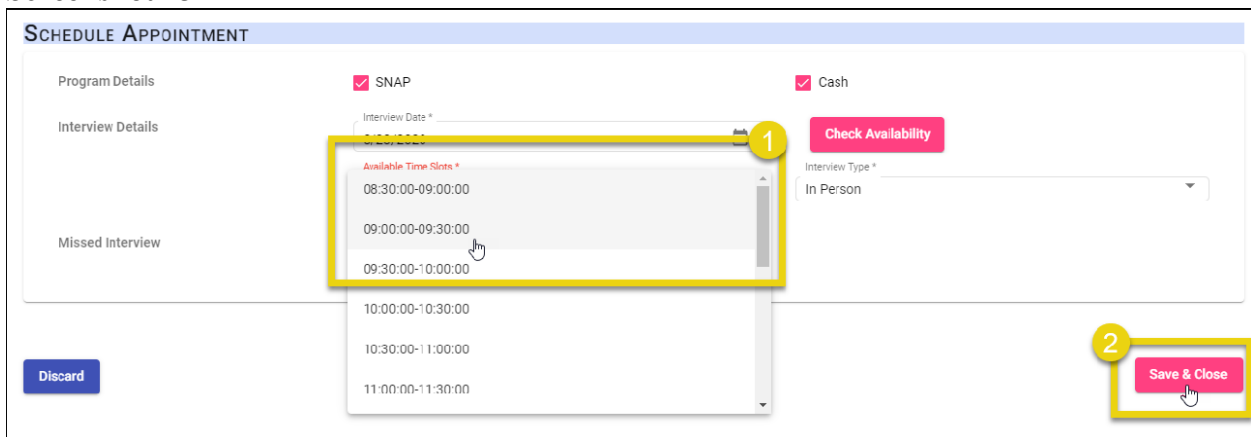
Method 2: From the E&E Taskbar

Method 2 can be utilized in rescheduling and updating appointments for both applications, and redeterminations. On the E&E Eligibility and Enrollment Worker Taskbar, enter the desired

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case ID and hit the magnifying glass. Once you are in Case Home, hit the Appointment Scheduling feature pictured on the top right.

Screenshot #4
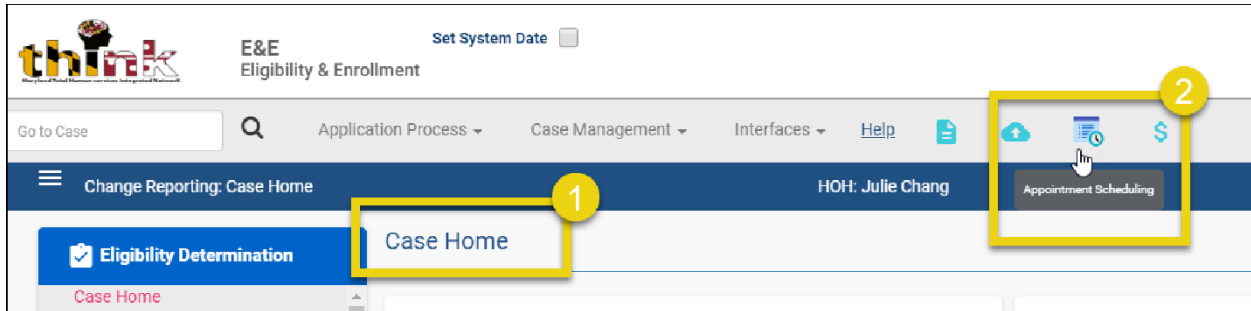
The same scheduling process will need to be conducted as in screens #2 and #3 described above in method #1 after this screen. After hitting save and close in screen #3, the Schedule Appointment window will reflect the scheduled time. Here, the case manager will update if the interview was a missed interview.

Screenshot #5
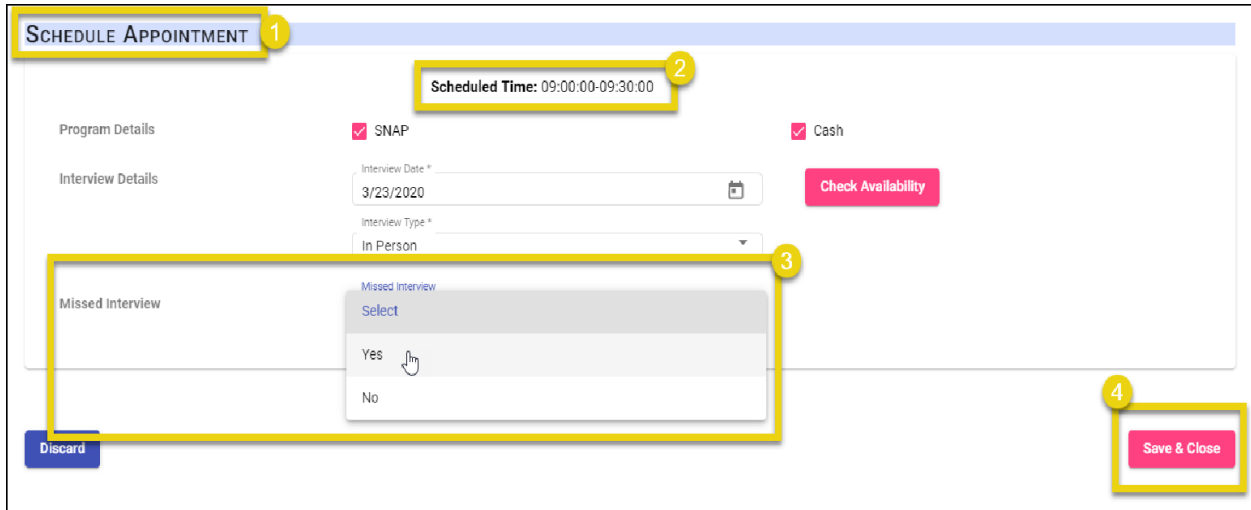
This window will also display a history of interviews with appointment details.

Screenshot #6

Redetermination Interviews

Redetermination Interviews will automatically be scheduled within the E&E system. The interview notice will go out with the redetermination packets.

Missed Interviews
- If the customer submits their redetermination packet but fails to be available for the scheduled interview, the interview will be considered as Missed.
- If the interview is missed, the caseworker will update the Interview Status from "Scheduled" to "Missed" via the Scheduled Appointment Section.

Notice: E&E will generate a Notice of Missed Interview (NOMI) at the end of the business day.

- If the customer does not turn in their redetermination packet prior to or on the day of their interview date, then that interview is not considered missed. Leave the interview indicator as scheduled. The customer will be mailed a Notice of Adverse Action that will be triggered on or around the 16th.

Reference: IM: #22-08 Redetermination Processing in E&E

ATTACHMENTS
How to Guide: Schedule an Interview
SNAP Manual Section 401 Screening for Expedite Services

INQUIRIES:

Please direct policy questions to FIA Policy by completing the FIA Policy Information Request

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Form found on Knowledge Base or via email at fia.policy@maryland.gov for Montgomery County only.

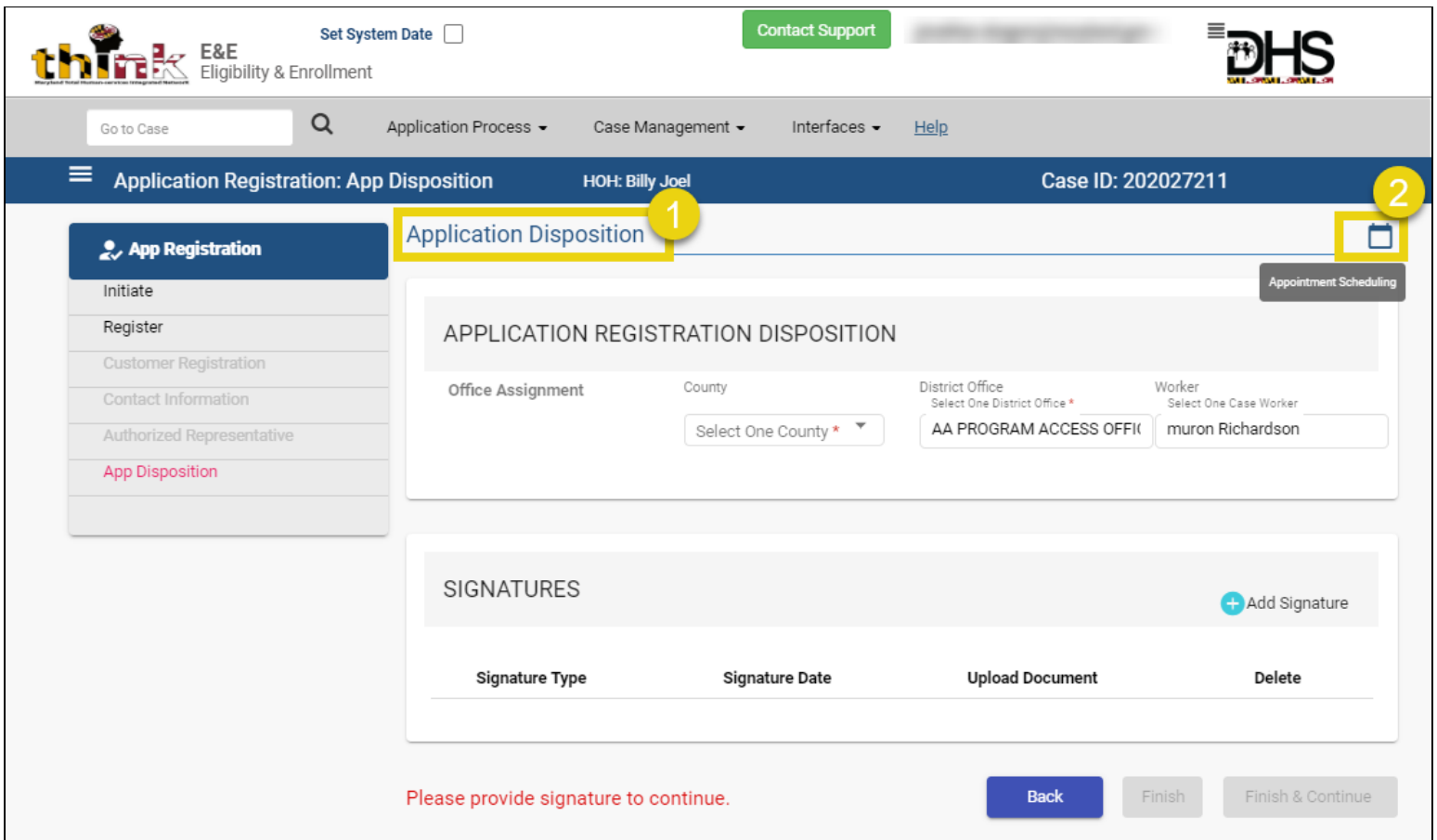For systems questions, please email fia.bsdm@maryland.gov.

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

Note: There are two methods you can schedule an interview, from the Application Disposition screen and/or from the E&E Taskbar once the application registration has been completed.

Method 1: From the application disposition screen.
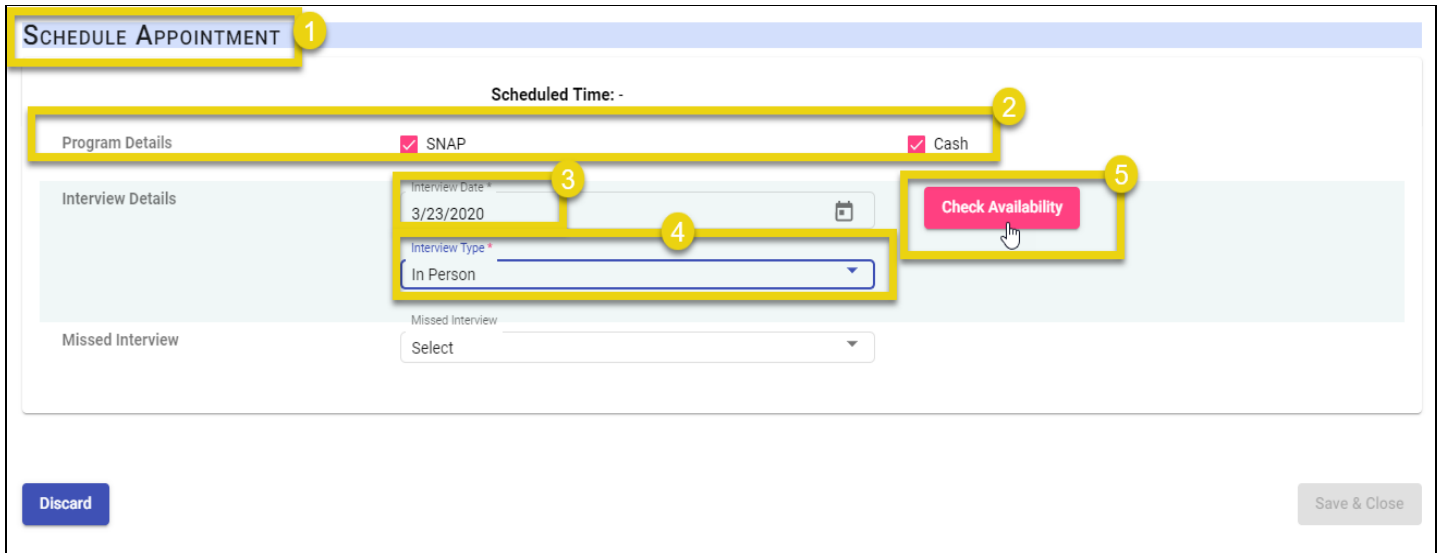
1. During Application Registration from the **Application Disposition (1)** screen, *click* on the **Appointment Scheduling (2)** icon.
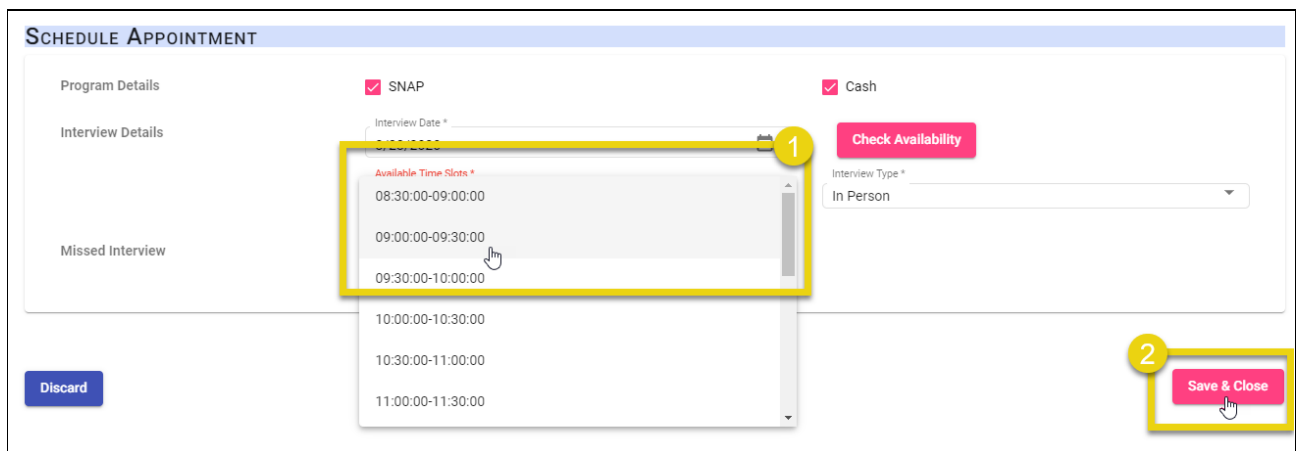
2. The **Schedule Appointment (1)** window will appear. *Click* the desired **Program checkboxes (2)** for the appointment. *Enter* the desired **Interview Date (3)**, then *select* the **Interview Type (4)** using the dropdown menu. Next, *click* the **Check Availability (5)** button.

3. The **Available Time Slots (1)** option will populate, select the desired time, and then *click* the **Save & Close (2)** button to schedule the interview.

Method 2: From the E&E Taskbar.

4. On the E&E Eligibility and Enrollment Worker Portal Dashboard, *enter* the desired **Case ID** number in the **Go to Case (1)** search bar and *click* the **Magnifying glass (2)** icon. The **Case Home screen** will display.
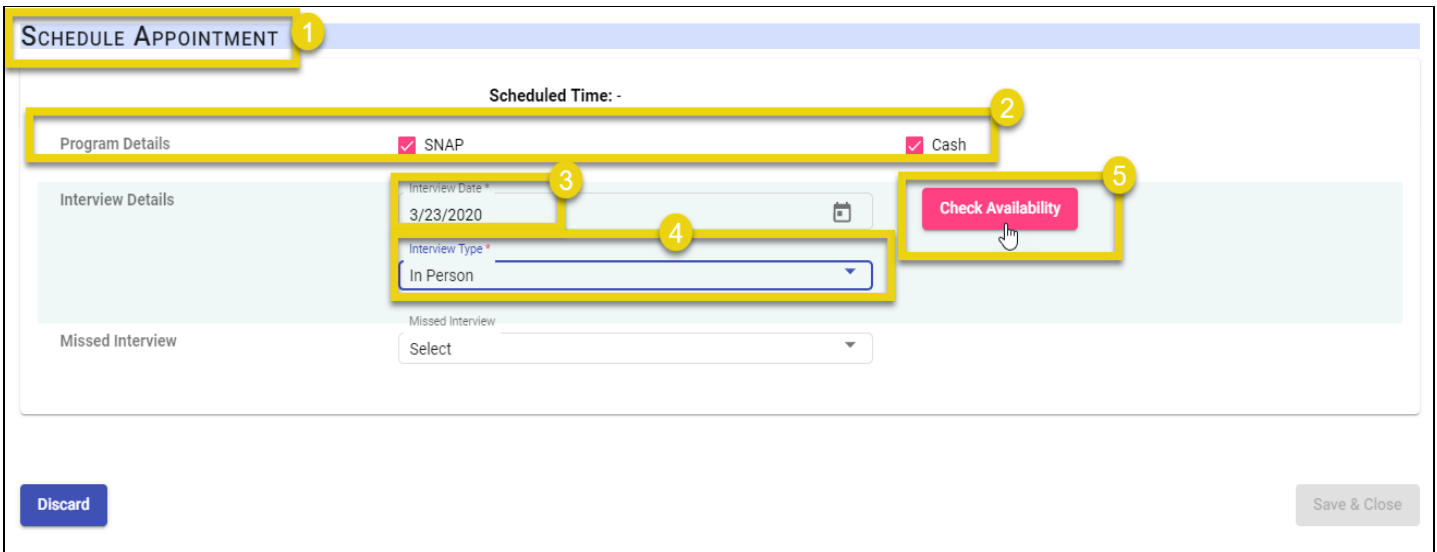
5. From the **Case Home (1)** screen you can *click* on the **Appointment Scheduling (2)** icon located on the taskbar.

6. The **Schedule Appointment (1)** window will appear. *Click* the desired **Program checkboxes (2)** for the appointment. *Enter* the desired **Interview Date (3)**, then *select* the **Interview Type (4)** using the dropdown menu. Next, *click* the **Check Availability (5)** button.
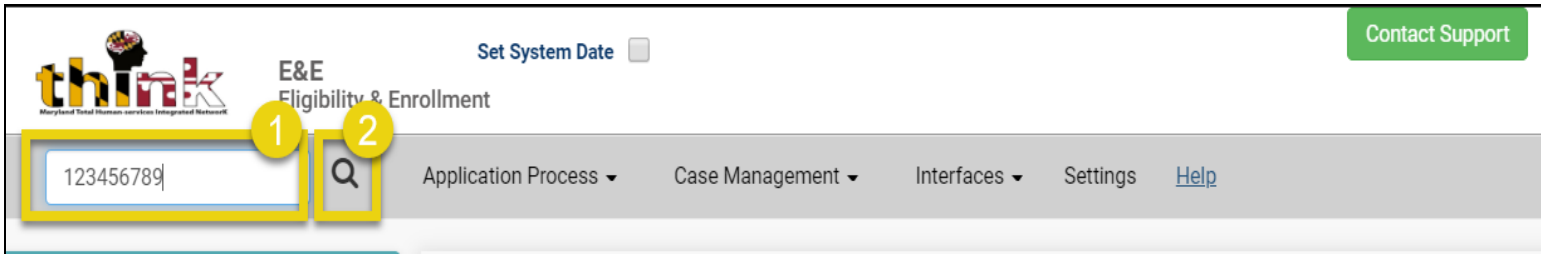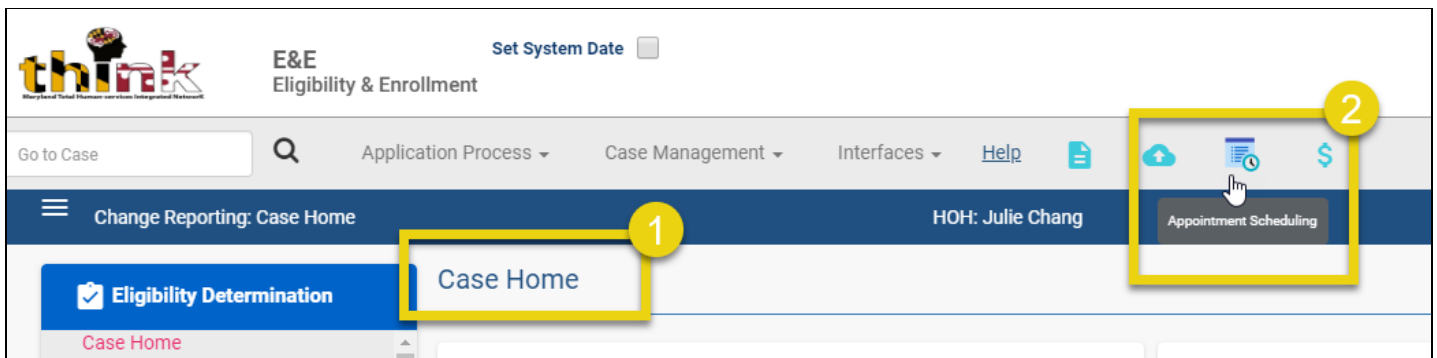

7. The **Available Time Slots (1)** option will populate, select the desired time, and then *click* the **Save & Close (2)** button.

8. In the **Schedule Appointment (1)** window you can view the **Scheduled Time (2)** and also update the interview using the **Missed Interview (3)** drop-down menu. *Click* on the **Save & Close (4)** button to proceed.

9. The **Schedule Appointment (1)** window will also display a list of the **History of Appointments (2)** with the appointment details.

401.1 Purpose

This section describes:

A. The policy and procedure to apply when screening a household for expedited Supplemental Nutrition Assistance Program (SNAP) benefits, and

B. The expedited processing standard.

401.2 Expedited Service Criteria

If otherwise eligible, the following households must receive expedited benefits within 7 calendar days of the date of application:

A. Households with less than $150 gross monthly income and who have $100 or less in liquid resources.

B. Households whose combined gross income and liquid resources are less than the household's monthly rent or mortgage and utilities, including entitlement to the SUA or LUA, as appropriate.

C. Migrant or seasonal farmworker households who are destitute (see Section 122, Migrants), and have liquid resources that do not exceed $100.

401.3 Identifying Households Requiring Service

A. Every local office must set up a procedure for all SNAP applicants to identify those households eligible for expedited service. This includes the SNAP only and combined SNAP and Temporary Cash Assistance (TCA) or Temporary Disability Assistance Program (TDAP) applications filed in person, by mail or fax, or electronically.

B. The procedure must also establish a method to identify entitlement to expedited service on the same day that a household seeks assistance.

401.4 Screening for Expedited Service

A. Households that meet expedited service eligibility criteria as defined in Section 401.2 must be given expedited SNAP benefits. Screening is the process of determining which households are potentially eligible for expedited services.

B. The local department must:

1. Screen all SNAP applications for expedite benefits;

2. Households must be screened on the date of application no later than the next business day to determine if the household meets the expedite criteria;

3. Assist the household with completing the application if assistance is needed or requested;

4. Assist the household in obtaining the correct information about income, shelter, and dependent care expenses within the expedited time frame (7 days from the date the application is filed); and

5. Accept the household's best estimate and document clearly the household's estimates if the information on income and deduction and expenses that are generally required to be verified cannot be obtained within the expedited time frame. Do not delay expedited service to households who are otherwise eligible if they cannot verify residency or income within the expedited service time frame.

Note: Any LDSS Expedite Eligibility Tool used to screen for Expedited should be completed and uploaded to E&E. In addition, expedited screening must be narrated in E&E.

C. When screening is completed, clearly document the following information:

1. The household's circumstances;

2. The eligibility decision (expedited service or normal processing); and

3. The reason for the decision.

D. Verification.

1. All households found eligible for expedited service **must have verification of identity**. This does not have to be a photo ID. The case manager must verify the identity of the applicant through a collateral contact or other readily available documentary evidence if the applicant has no proof of identity.

    Example: For a customer who states that he stayed the previous night in a particular homeless shelter or hospital but does not have any proof of identity, the case manager must make every effort to contact the shelter or hospital in an attempt to verify his identity.

Note: If the customer is known to E&E, you can ask a question about personal data that only the person is likely to know.

2. The case manager uses the applicant's statement about the amount of income, assets, and deductions in determining the benefit amount if verification is not available. The case manager:

   a. Must make reasonable efforts to verify the household's residency, income, shelter, and dependent care expenses, liquid resources, and other factors of eligibility within the expedited processing time frame.

   b. Cannot delay certification beyond the expedited processing timeframe if eligibility criteria other than identity cannot be verified.

401.5 Expedited Service Standard

A. The local department must give eligible households the opportunity to participate on or preferably before the seventh day for expedited cases. "Opportunity to participate" means the household has access to benefits (households must have their EBT card, have been trained in its use and benefits must be available on EBT).

   According to federal guidance, the household is considered to have the opportunity to participate 24 hours after the case manager notifies the customer by phone, or in person, or 3 days after the customer is notified by mail. It is important to narrate when a case manager notifies a customer of his or her eligibility at the interview or by phone.

B. If there are intervening weekends or holidays, the procedure is as follows:

   1. When the seventh calendar day is Saturday or Sunday, finalize the case on or before the previous Thursday to ensure that benefits are available by Friday.

   2. When the seventh calendar day is a holiday that falls on Monday, finalize the case on or before the previous Thursday to ensure that benefits are available by Friday.

   3. When the seventh calendar day is a holiday that falls on Friday, finalize the case on or before the previous Wednesday to ensure that benefits are available by Thursday.

4. Households that apply for SNAP benefits after the 15th of the month and are eligible for expedited benefits are entitled to SNAP for the initial month and the second month without additional verification requirements. SNAP benefits for the 3rd month may not be issued until all postponed verification is received.

5. Households that apply for SNAP benefits after the 15th of the month are eligible for shelter/dependent care expense deduction only in the initial month. Form 1052 should be issued to customers, the customer has 10 days to return the verification, if verification is not received within 10 days, recertify without the deduction.

Reminder: If the customer is applying for SNAP benefits and has an ongoing associated case the case manager may have to enter program specific verification codes to prevent the closure of the ongoing case when SNAP benefit verification is pending.

401.6 Interviews

A. An interview is required before expedited SNAP benefits can be issued.

B. If a household does not complete the interview by the 7th calendar day, the application **can not be processed** within the established expedited service time frames. The application must be processed within the normal 30 days of the date of application, in accordance with 7 CFR 273.2 (FNS- GD- 2006-011) of the rules.

Example: Ms. A applied for SNAP on October 5 through myMDTHINK. When applying for SNAP, Ms. A uploaded a copy of her license and lease. She meets expedited service criteria. The case manager calls Ms. A several times but was unable to reach her on her interview day. For Ms. A, to receive expedited services, she must participate in an interview; if not her case will be processed as a 30-day application.

C. For households that apply on or before the 15th of the month, the case manager will not postpone the interview the case manager must request verification no later than the end of the month of application. Verification of shelter and dependent care expense are due within the 7-day timeframe of expedited services.

- The case will close at the end of the expedited period if the household fails to participate in an interview or fails to provide the needed verification.

- Shelter and dependent care expense deduction will be removed if not verified in the first month.

   Note: It is important to schedule the interview to allow enough time for the customer to provide any required verification.

E. For households that apply after the 15th of the month, the case manager is required to schedule the interview and request verification of shelter/dependent care expense deduction along with income and residency within the 7-day timeframe. The case manager should issue form 1052 for shelter/ dependent care expense deduction, if the verification is not received within 10 days remove the deduction at the end of the first month.

   - The case is closed if the household fails to participate in an interview or fails to provide the needed verification.
   - Shelter and dependent care expenses will be removed if not verified.

   Note: There should be very few cases where identity cannot be verified with available sources.

The interview:

A. As part of the interview, the interviewer must explore and resolve with the household any unclear or questionable information. The interviewer must conduct the interview as an official and confidential discussion of household circumstances and protect the applicant's privacy.

B. Households must have a face-to-face or telephone interview with a case manager at initial certification (or shortly thereafter in the case of waived interviews for expedited cases) and at least every 12 months after that.

   Note: The case manager must complete Option O (Interview) during or shortly after the interview to prevent E&E from sending an inappropriate notice of missed interview.

C. The calendar day after the filing date is the first day of the count. The application, for filing date purposes only, maybe page one of the signed

   DHS/FIA 9701 or the 9711 (Assistance Request Form) or the date local department receives the myMDTHINK application and e-signature or signature page.

401.7 Telephone Interview

A. **Do not count** the mailing days toward the seven-day count if a telephone interview is conducted and the application is mailed to the household for signature. The application must be **mailed the same day** the telephone interview is conducted.

B. For **expedited processing** only, mailing days means any days the application is in the mail to and from the household. Mailing days include **any days the application is in the household's possession** before being returned to the local department.

401.8 Special Procedures for Expediting

A. Use the following procedures to provide expedited service to potentially eligible households:

1. Verify the applicant's identity through collateral contact or readily available documentary evidence if the household is unable to provide verification.

2. Make reasonable efforts to verify (within the 7-day expedited service time frame) the household's residency, income, shelter, and dependent care expenses. **Do not delay** expedited service to households who are otherwise eligible if they **cannot verify residency, income, shelter, or dependent care expenses** within the **expedited service time frame.**

   Note: The local department should also verify residency, income, shelter, utilities, and dependent care expenses provided that the verification process is within the expedited service time frame.

3. Complete the work registration for the applicant (unless the individual is exempt or the household has designated an authorized representative to apply on its behalf).

   Note: Attempt to register for work all other non-exempt household members. The local department may attempt to verify questionable work registration exemption claims by the household. However, postpone such verification if the expedited service time frame cannot be met.

4. The household is responsible for providing the necessary verifications for expedited service. However, the local department must assist the household in obtaining the necessary verification if requested.

5. Assign a normal certification period to households that are certified on an expedited basis and have provided all required verifications as described in Section 408 (Verification) of this manual.

   Note: The local department may assign a **one-month certification** period to households that are certified on an expedited basis and **do not provide all required verification. Provide a notice of eligibility and a notice of expiration** to the household at the same time. The shelter and dependent care expenses will be allowed in the first month, once form 1052 is issued by the case manager, the customer has 10 days to respond or the deduction will be removed in the second month.

6. There is no limit to the number of times a household can be certified under expedited procedures, as long as prior to each expedited certification, the household:

   (a) Has completed the verification requirements that were postponed at the last expedited certification; or

   (b) Was certified under normal processing standards since the last expedited certification.

7. Process the application of a household requesting, but not eligible for expedited service, according to normal processing standards (see Section 406, Normal Processing Standards).

B. Screen all signed applications filed electronically for expedited eligibility. If the verification of identity is provided, issue SNAP benefits within the seven-day processing standard.