

<b>DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION</b>	<b>FOOD SUPPLEMENT PROGRAM MANUAL</b>	
EXPEDITED SERVICE	Section 401	Page 1

### **401.1 Purpose**

This section describes:

- A. The policy and procedure to apply when screening a household for expedited Food Supplement Program (FSP) 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:

- 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 farm worker 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 FSP applicants to identify those households eligible for expedited service. This includes the FSP only and combined FSP 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 FSP benefits. Screening is the process of determining which households are potentially eligible for expedited services.
- B. The local department must:
  1. Assist the household with completing the application if assistance is needed or requested;

<b>DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION</b>	<b>FOOD SUPPLEMENT PROGRAM MANUAL</b>	
EXPEDITED SERVICE	Section 401	Page 2

#### **401.4 Screening for Expedited Service (continued)**

2. Assist the household in obtaining the correct information about income and expenses within the expedited timeframe (7 days from the date the application is filed); and
  3. Accept the household's best estimate and document clearly the household's estimates if the information on income and expenses cannot be obtained within the expedited timeframe.
- 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:
    - a. 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. Note: If the customer is known to CARES, you can ask a question about personal data that only the person is likely to know.
    - b. 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.
  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, liquid resources and other factors of eligibility within the expedited processing time frames.
    - b. Cannot delay certification beyond the expedited processing timeframes if eligibility criteria other than identity cannot be verified.

<b>DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION</b>	<b>FOOD SUPPLEMENT PROGRAM MANUAL</b>	
EXPEDITED SERVICE	Section 401	Page 3

## 401.5 Expedited Service Standard

- A. The local department must give eligible households the opportunity to participate on or preferably before the 7<sup>th</sup> 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.
- C. Households that apply for FSP benefits after the 15<sup>th</sup> of the month and are eligible for expedited benefits, are entitled to FSP for the initial month and the second month without additional verification requirements. FSP benefits for the 3<sup>rd</sup> month may not be issued until all postponed verification is received.

Reminder: If the customer is applying for FSP 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 FSP benefit verification is pending.

## 401.6 Interviews

### The waiver:

- A. In the past an interview was required before expedited FSP benefits could be issued.
- B. In 2010, Maryland received a waiver from FNS that allows us to postpone the required interview prior to issuing expedited service for households covered under the waiver.

<b>DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION</b>	<b>FOOD SUPPLEMENT PROGRAM MANUAL</b>	
EXPEDITED SERVICE	Section 401	Page 4

## 401.6 Interviews (continued)

- C. The waiver is limited to households who meet the criteria for expedited service and who **the case manager has attempted contact for an interview, but has been unable to reach the customer.**

Note: There must have been at least one attempt to contact the applicant at the telephone number listed on the application. **The attempt must be narrated in CARES.**

Example: Ms. A applies for FSP on October 5 through myDHR. She meets expedited service criteria. The case manager attempts to call Ms. A on October 6 but does not reach her. Ms. A is known to CARES so it is possible to verify identity. The case manager certifies Ms. A for the month of October with postponed interview and verification. The case manager also sends the customer an interview appointment for a specific date and time for a telephone interview. If the customer does not participate in the schedule interview, no further action is needed.

- D. The waiver also includes any household where the case manager determines that an interview cannot be scheduled in time to meet the 7-day expedited time frame.
- E. The waiver applies only to applicants whose identity can be verified..
- F. For households that apply on or before the 15<sup>th</sup> of the month, the case manager will postpone the interview and any required verification for no later than the end of the month of application.
- 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.

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

- G. For households that apply after the 15<sup>th</sup> of the month, the case manager will postpone the interview and any required verification for no longer than the month subsequent to the month of application.
- The case is closed if the household fails to participate in an interview or fails to provide the needed verification.
- H. CARES will establish a 6 month certification period to households subject to the waiver.

<b>DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION</b>	<b>FOOD SUPPLEMENT PROGRAM MANUAL</b>	
EXPEDITED SERVICE	Section 401	Page 5

## 401.6 Interviews (continued)

- The notice of eligibility must tell households of the postponed interview requirement, provide an **interview appointment for a specific date and time**, and tell them the case will close if they do not participate in the postponed interview.
- **Important: To meet this requirement the following freeform text is required on every eligibility notice for those subject to the waiver.**

Add the following freeform text to the notice to the customer:

We issued your Food Supplement Program benefits without an interview. We must interview you before you receive any further benefits. We have scheduled a telephone/office (whichever applies) interview for you on \_\_\_\_\_ at \_\_\_\_\_. If you do not keep the schedule interview your benefits will end.

- I. If the household does not satisfy the postponed verification and does not participate in an interview the case manager does not have to contact the customer again.
  - J. Households whose identities cannot be determined do not qualify for the waiver and must be processed under normal application processing procedures.

**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 CARES from sending an inappropriate notice of missed interview.

- D. The calendar day after the filing date is the first day of the count. The application, for filing date purposes only, may be page one of the signed

<b>DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION</b>	<b>FOOD SUPPLEMENT PROGRAM MANUAL</b>	
EXPEDITED SERVICE	Section 401	Page 6

### 401.6 Interviews (continued)

DHR/FIA CARES 9701 or the 9711 (Assistance Request Form) or the date local department receives the myDHR 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 timeframe) the household's residency and income. **Do not delay** expedited service to households who are otherwise eligible if they **cannot verify residency or income** within the **expedited service timeframe**.

**NOTE:** The local department may also verify residency and income provided that the verification process is within the expedited service timeframe.

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).

<b>DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION</b>	<b>FOOD SUPPLEMENT PROGRAM MANUAL</b>	
EXPEDITED SERVICE	Section 401	Page 7

### 401.8 Special Procedures for Expediting (continued)

**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 timeframe 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.

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 FSP benefits within the seven day processing standard.

<b>DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION</b>	<b>FOOD SUPPLEMENT PROGRAM MANUAL</b>	
EXPEDITED SERVICE	Section 401	Page 8

## 401.9 Expedited Food Supplement Program Benefits – Questions and Answers

**Question 1.** What verification does the applicant have to provide before I can issue expedited benefits?

**Answer 1.** The case manager must obtain verification of the identity of the person applying **through any readily available documentation or through collateral contact prior to issuing expedited FSP benefits.** There is no requirement that the verification be a picture ID.

**Question 2.** We have to issue expedited benefits the day after application or no later than 7 days after application. What if there is not enough time to interview the applicant on the day of application or during the 7-day period after the application filing date?

**Answer 2.** The interview requirement is waived for expedited households if you have made an unsuccessful effort to either interview the applicant or set up an interview appointment within the 7-day timeframe. Schedule the interview within the application month for those applying on or before the 15<sup>th</sup> and before the end the month following the application for those applying after the 15<sup>th</sup>.

**Question 3.** In the interview the applicant stated he had signed a waiver of a FSP administrative disqualification hearing two months ago. It was the first violation. He is the only person in the household. He meets expedited service criteria. Should I issue him expedited FSP benefits?

**Answer 3.** No. He is not eligible for FSP benefits for 12 months because of his IPV disqualification period. Note: The disqualification should be on CARES and in the nationwide electronic Disqualification Recipient System (e-DRS).

**Question 4.** We have issued expedited benefits based on the household's statement of income, expenses and resources. The only verification we have is of identity. How long does a household that received expedited service have to provide other required verification?

**Answer 4.** For households that apply for FSP benefits before the 15<sup>th</sup> of the month the household has until the end of the application month to provide verification. You cannot issue the second month's benefits without mandatory verification.

Customers applying for FSP benefits after the 15<sup>th</sup> of the month and who are eligible for expedited FSP benefits have until the end of the ongoing month to provide required verification. When verification is postponed, the 3<sup>rd</sup> month's issuance cannot be made until the local department receives the postponed verification.

Remember that resources are not counted and do not need to be verified for categorically eligible households.

<b>DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION</b>	<b>FOOD SUPPLEMENT PROGRAM MANUAL</b>	
EXPEDITED SERVICE	Section 401	Page 9

## **401.9 Expedited Food Supplement Program Benefits – Questions and Answers (continued)**

Example: Ms. S lost her job in November and applies for FSP benefits on December 18. She meets the expedited service criteria and is eligible for expedited FSP benefits. She verified her identity with her driver's license, but did not have verification of income. The local department must issue Ms. S's December (prorated) FSP benefits so that she can get them the next day or no later than 7 days after she filed her application. She will also receive January benefits issued during the regular EBT benefit issuance, even though she has not yet provided outstanding verification.

**Question 5.** What do I do if the household drops off an application and does not stay for an interview?

**Answer 5.** The local department must make every effort to screen all drop-off applications for expedited service before the applicant leaves. At that time the person assigned to this job should ask for any documentation that would verify identity. The customer must be given a scheduled appointment for an interview. It is also helpful to get a phone number where the applicant can be reached.

Reminder: To schedule an interview through CARES go to the MISC screen. Enter the EW ID, enter "INT" in the Appt. Type field, and enter the date and time of the interview. CARES will generate a notice to the household.

**Question 6.** What happens if we don't have verification of identity, but it appears that the household is potentially entitled to expedited service?

**Answer 6.** Generally, this should happen only if a new customer (not known to CARES) has mailed, faxed, sent the application as an e-mail attachment or submitted a myDHR application. If the household's identity cannot be verified, even with your help, within the expedited time frame, the household cannot receive expedited service. The local department must continue to assist the household to obtain the necessary verification so that the household's application can be processed as soon as possible but within 30 days. If the application includes a telephone number, the case manager should try to contact the applicant by phone to request the verification. If there is no phone number, the local department should schedule an interview appointment.

**Question 7.** How often can someone get expedited FSP benefits?

**Answer 7.** There is no limit to the number of times a household can be certified under expedited service policy as long as prior to each expedited certification, the household either:

- Provides verification that was postponed at the last expedited certification, or
- Was certified under normal processing standards since the last expedited certification.

DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION	FOOD SUPPLEMENT PROGRAM MANUAL	
EXPEDITED SERVICE	Section 401	Page 10

## 401.9 Expedited Food Supplement Program Benefits – Questions and Answers (continued)

**Question 8.** Can someone get expedited service at recertification?

**Answer 8.** If the household applies before the end of its current certification period, the expedited service policy does not apply. If the household reapplies after the expiration of the certification period, the household must be screened for expedited service.

Example: Ms. A did not get a notice that the redetermination was due. She did not realize her certification period had expired June 30 until she went to the food store in July and found that her benefits were not available. She reapplied July 6<sup>th</sup>. The local department determined that she was eligible for expedited service and issued her FSP benefits July 7<sup>th</sup> under expedited processing procedures. Since this was an agency error, the household would get FSP benefits back to the 1<sup>st</sup> of the month.