



**FIA ACTION TRANSMITTAL**

**Control Number: 19-09**

**Effective Date: Immediately**

**Issuance Date: January 10, 2019**

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

**FROM: NETSANET KIBRET, EXECUTIVE DIRECTOR**

**RE: FIA BENEFITS FOR FURLOUGHED FEDERAL GOVERNMENT AND  
GOVERNMENT CONTRACTUAL EMPLOYEES**

**PROGRAMS AFFECTED: SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM  
(SNAP), TEMPORARY CASH ASSISTANCE (TCA), AND EMERGENCY  
ASSISTANCE FOR FAMILIES WITH CHILDREN (EAFC)**

**ORIGINATING OFFICE: OFFICE OF PROGRAMS**

**Summary**

The federal government shutdown began at midnight EST on Saturday, December 22, 2018 and is ongoing. As a result certain federal government employees are currently furloughed without pay or working without pay. Contractual federal employees and employees of federal contracting companies are also impacted by the shutdown. This change in income may make some households eligible for Supplemental Nutrition Assistance Program (SNAP) benefits.

In determining SNAP eligibility, FIA will *not* consider any future income a customer may receive from the federal government or federal contractor while she or he is not receiving pay. This policy will remain in effect until the federal government restores funding and customers receive a paycheck.

On January 8, 2019, the United States Department of Agriculture (USDA) announced that February 2019 SNAP benefit funding will be available, but that it requires states to issue February benefits by January 20, 2019. FIA will provide further guidance on this in the near future.

## **Action Required**

### **RE: SNAP**

A case manager must follow current procedures when processing an application for a furloughed federal government employee. This includes complying with ABAWD and FSET requirements.

If the customer would otherwise be in compliance with ABAWD requirements were it not for the federal government shutdown, the case manager must narrate that good cause is being granted pursuant to FSP Manual section 106.9.

If the customer would otherwise be in compliance with FSET requirements were it not for the federal government shutdown, the case manager must narrate that the customer has a job related exemption pursuant to FSP Manual section 130.6. Additionally, verification that a customer has applied for and is awaiting a decision for unemployment insurance can also be used to exempt a customer from FSET requirements pursuant FSP Manual section 130.F

Customers impacted by the federal shutdown will likely be unable to provide verification of their current furlough status or verification that they will receive no pay until further notice. Additionally, some federal employees may be identified as essential employees, and are therefore working without pay.

The case manager must request the date and amount of any earnings the customer received in the month of application and will receive in the future as a result of time worked prior to the government shutdown. These gross earnings must be verified according to SNAP policy. All gross earnings must be entered into CARES.

As it pertains to ongoing income, the case manager must have the customer complete and sign the DHS/FIA 248 form. The form is attached to this Action Transmittal. Each furloughed household must complete and sign his or her own form; each form must be uploaded into ECMS and noted in CARES narration.

Beginning with the first month in which the customer states he or she will receive no income as a result of the furlough, the furloughed income should be removed from CARES and not counted toward the household's income.

In addition to narration typically required on a SNAP case, the case manager must also narrate the customer's pay status and all actions taken by the case manager to verify/document earnings and employment status.

Note: The above actions apply only to federal employees and federal contractors not currently receiving earned income as a result of the shutdown.

**RE: TCA**

Case managers must follow current policy and procedure when processing a TCA case for this population. This includes cooperating with the Child Support Administration, being screened for substance use, and applying for unemployment insurance benefits. If the customer has not already applied for unemployment insurance benefits, refer him or her to the state unemployment office in which his or her job is located. For example, if the customer works in the District of Columbia, the customer should be referred to the District of Columbia's Department of Employment Services. If the customer works in Maryland, the customer should be referred to Maryland's Department of Labor, Licensing and Regulation's Division of Unemployment Insurance.

The above verification guidelines can be used for the purpose of establishing TCA eligibility.

In regards to good cause from TCA work requirements, the local departments of social services may grant good cause from work requirements pursuant to COMAR 07.03.03.07-1(I)(8). Remember to include CARES narration justifying the reason for granting good cause.

**RE: EAFC**

Each local department of social services should follow its individual standard operating procedure for EAFC.

**Payment Accuracy**

The probability of overpayment for this specific population is high. The customers may fail to notify their local departments when they resume receiving pay. Therefore case managers must remind customers of the importance of reporting all changes, and, in particular, changes in income. Case managers must ensure that action is taken timely on all reported changes.

**Attachment**

DHS/FIA 248 form: "Customer Affidavit Regarding Employment Verification: Federal Government Shutdown"

**Inquiries**

For policy-related questions, please complete the [FIA Policy Information Request Form](#) found on Knowledge Base as shown in the screenshot below.

The screenshot shows the DHS Knowledge Base website. The top navigation bar includes 'Administrations', 'Tools', 'Resources', 'Links', and 'Local Offices'. The left sidebar lists various categories, with 'Family Investment Administration' and 'Contact us with your FIA Program Eligibility Policy Question' circled in red. The main content area features a 'Contact us with your FIA Program Eligibility Policy Question' heading and a 'FIA Policy Information Request' section. The right sidebar contains contact information for Labelle Hillgrove (FIA Ombudsman) and Yolanda M. Dockery (FIA Chief of Staff).

**DHS Knowledge Base**

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### Contact us with your FIA Program Eligibility Policy Question

#### FIA Policy Information Request

Have a FIA policy question? Click on the link to complete a Policy Information Request. Your question will be routed directly to the Bureau of Policy.

Questions will be answered within 48 business hours. If a question requires further research, you will be notified that there will be a delay and kept apprised of the status. Remember to review the policy manuals, Action Transmittals, and forms found on Knowledge Base (<http://kb.dhs.maryland.gov/family-investment-administration/>) prior to submitting a request many times the answer to your question can be found through our online resources.

Technical questions regarding CARES functions should be directed to the Bureau of Systems Development and Management at [fia.bsdm@maryland.gov](mailto:fia.bsdm@maryland.gov).

\* Required

Email address \*

For CARES/systems questions, please contact [fia.bsdm@maryland.gov](mailto:fia.bsdm@maryland.gov).

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