



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

## FIA INFORMATION MEMO

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Effective Date: Immediately

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

**FROM: AUGUSTIN NTABAGANYIMANA, FIA ACTING EXECUTIVE DIRECTOR** *Augustin*  
**DEBBIE RUPPERT, MDH EXECUTIVE DIRECTOR** *Debbie Ruppert*

**RE: MARYLAND SAFE AT HOME PROGRAM/CONFIDENTIALITY OF CUSTOMER INFORMATION**

**PROGRAM AFFECTED: ALL PROGRAMS**

**ORIGINATING OFFICE: OFFICE OF OPERATIONS**

### SUMMARY

This Information Memo (IM) is a revision of IM 14-17 Maryland Safe at Home Program/Confidentiality of Customer Information. The purpose of the IM is to remind the Department of Human Services (DHS), Family Investment Administration (FIA) Central, the Local Department of Social Services (LDSS), and the Local Health Departments (LHD) staff of the Maryland Safe at Home Address Confidentiality Program (ACP) policy.

### POLICY

Maryland Safe at Home ACP is a program administered by the Office of the Secretary of State. The program provides victims of domestic violence, human trafficking, sexual assault, and stalking a free confidential and legal address to use in place of their physical home address, in order to safeguard their location. Program participation is for four years, unless the customer withdraws, or is removed from the program. Customers may re-enroll every four years as long as they still qualify for the program. The LDSS and LHD will use the ACP customers' address when processing all programs.

ACP has two components:

1. **Substitute Address** - ACP provides a substitute address for customers who have moved

or are about to move to a new location unknown to their abuser.

2. **Mail-Forwarding Service** - ACP provides customers with a free confidential mail-forwarding service for first-class mail and legal papers.

ACP customers should use the ACP substitute address every time they interact with State and Local government agencies. If an agency has questions about the program, or use of the address, ACP may be contacted by the number on the back of the card.



It is important that ACP customers' home addresses are safeguarded. If customers provide State or Local government agencies with their actual address, it could become public information.

- The ACP has special procedures in place for ACP customers to interact with the Motor Vehicle Administration, State Board of Elections, and Public Schools (including community colleges).
- Using special procedures at the Motor Vehicle Administration, customers can obtain a driver's license without revealing their residential address.
- The State Board of Elections has an address confidentiality program that allows voters to have their actual address suppressed, and therefore not part of any public record. The ACP urges customers who are eligible voters to apply.

#### Reminder to LDSS

- If a customer is *enrolled in the ACP* and provides a "Safe" address, please use only the address provided.
  - **Do not deny or close** the case because the customer did not provide their *home* address.
  - **Do not request** verification of *home* address.
- The customer's home address must **not** be entered into the Eligibility and Enrollment (E&E) System.
- ACP customers are provided an ACP authorization card with their substitute address, but verification of the ACP card is not required for eligibility.
- LDSS must accept ACP customers' redacted addresses for shelter and utility verification.
  - Ensure the customer's name and date of the verification (i.e., shelter or utility expense) are visible on the document but the address can be crossed out by the customer.

**Example:**

 <b>Proper Handling Scenario</b>	 <b>Improper Handling Scenario</b>
<p>The customer applied for Supplemental Nutrition Assistance Program (SNAP) and during the interview reported being a victim of domestic violence and participating in ACP. The customer also provided pay stubs, a rent letter and utility bills. All of the customer's documents had the physical address crossed out.</p> <p><b>LDSS Action:</b></p> <ul style="list-style-type: none"> <li>• The case manager reviews all documents.</li> <li>• Updates E&amp;E with income, shelter, and utility expenses.</li> <li>• The case manager processes and narrates the case.</li> <li>• Within the narration the case manager does not report the physical address.</li> </ul>	<p>The customer applied for Supplemental Nutrition Assistance Program (SNAP) and during the interview reported being a victim of domestic violence and participating in ACP. The customer also provided pay stubs, a rent letter and utility bills. All of the customer's documents had the physical address crossed out.</p> <p><b>LDSS Action:</b></p> <ul style="list-style-type: none"> <li>• The case manager reviews all documents.</li> <li>• Case manager sends a 1052 - Request for Information requiring the customer to provide address, shelter, and utility verification, so their physical address can be verified.</li> <li>• Verification was not received, and the case manager denies application.</li> </ul> <p><b>Ripple Effect:</b></p> <ul style="list-style-type: none"> <li>• Creating barriers to meaningful benefits and undue hardship to the customer.</li> <li>• May also result in incorrect decisions, Quality Control (QC) errors, loss of appeals hearings, etc.</li> </ul>

**NOTE:**

*Best practice is to eliminate barriers to accessing meaningful services.*

If a customer is interested in enrolling in the ACP, they can register by calling Maryland Safe at Home at 410-260-3875. To learn more information about the program visit [Maryland Safe at Home Address Confidentiality Program ACP](https://sos.maryland.gov/ACP) at sos.maryland.gov/ACP.

**REFERENCES:**

[Address Confidentiality Program \(ACP\) - Frequently Asked Questions](#)  
[IM 14-17 Maryland Safe at home Program/Confidentiality of Customer Information](#)  
[Maryland Safe at Home Address Confidentiality Program \(ACP\)](#)  
[The Work Book - Work Participation](#)

**INQUIRIES:**

Please direct policy questions to FIA Policy by completing the [FIA Policy Information Request Form](#) found on Knowledge Base or via email at [fia.policy@maryland.gov](mailto:fia.policy@maryland.gov) for Montgomery County only. For systems questions, please email [fia.bsdm@ma](mailto:fia.bsdm@ma) (For MA only).

For MHC systems questions and issues, contact the Maryland Health Benefit Exchange's Office of Consumer Assistance, Eligibility Policy & Business Integration at 410-547-6327.

For MA policy questions: Direct Non-MAGI and MAGI policy questions to the Maryland Department of Health, Office of Eligibility Services at [mdh.oesinquiries@maryland.gov](mailto:mdh.oesinquiries@maryland.gov).

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