

FAMILY INVESTMENT ADMINISTRATION

Policy Number:	25-04
Policy Title:	Maryland Benefit Review (MBR) Periodic Reporting Process and Verification Requirements
Release Date:	November 22, 2024
Effective Date:	Upon Receipt
Approved By:	Augustin Ntabaganyimana Executive Director Family Investment Administration (FIA)
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Supersedes:	FIA Action Transmittal (AT) #22-25 (previous version released June 29, 2022)
Originating Office:	Office of Programs fia.policy@maryland.gov
Required Actions:	The purpose is to inform DHS and FIA staff of the updated MBR periodic review reporting process and verification requirements for all SNAP households.
Key Words:	Maryland Benefit Review Form, MBR form, simplified reporters, and periodic report(s)
Related Federal Law	<u>7 CFR § 273.12(a)</u> <u>7 CFR § 273.2(f)(8)(ii)</u>
Related State Laws	Not Applicable
COMAR	Not Applicable
State Plan Implications?	Yes



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**FAMILY INVESTMENT
ADMINISTRATION (FIA) ACTION
TRANSMITTAL**

Control Number: # 25-04

Effective Date: Upon Receipt

Issuance Date: November 22, 2024

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

FROM: AUGUSTIN NTABAGANYIMANA, EXECUTIVE DIRECTOR

**RE: MARYLAND BENEFIT REVIEW (MBR) PERIODIC REPORTING
PROCESS AND VERIFICATION REQUIREMENTS**

**PROGRAM AFFECTED: SUPPLEMENTAL NUTRITION ASSISTANCE
PROGRAM (SNAP)**

ORIGINATING OFFICE: OFFICE OF PROGRAMS

Summary

This Action Transmittal (AT) outlines the process and reporting requirements for households that submit a mandatory 6-month periodic report using the required Maryland Benefit Review (MBR) Form for the Supplemental Nutrition Assistance Program (SNAP). It also explains the requirements for verifying changes reported by simplified reporters during the certification period.

The MBR form is generated and mailed to the household at least 60 days before the due date. Once generated, the MBR form is accessible on the myMDTHINK Consumer Portal for electronic submission. Access to the MBR form through myMDTHINK means customers do not have to wait to receive the mailed form to submit an MBR form.

Case managers must ensure that all reporting and verification requirements are appropriately and uniformly assessed throughout the 6-month periodic reporting process.

Required Action

Processing an MBR

The customer is responsible for completing and returning the MBR form to the local office on or before the last day of the **sixth** month of the current certification period. To allow the local office processing time, the MBR form states that the customer must complete and return the MBR form to the local office on or before the last day of the fifth month of the certification period. SNAP eligibility is not yet impacted if the customer does not return the completed MBR form by the MBR Due Date.

MBR forms must be processed using the Interim Change function in the Eligibility & Enrollment (E&E) system. LDSS staff can use the [E&E How-to-Guide: Process Maryland Benefits Review](#) to assist with completing the 6-month periodic reporting process.

Case managers must review and cross-check the current MBR form against historical case narration, previously submitted applications, redeterminations, interim change reports, expenses (Shelter/Medical) and earned/unearned Income screens within the Eligibility & Enrollment (E&E) system.

If the customer fails to submit the completed MBR form by the Simplified Reporting Date, the customer must re-apply for SNAP benefits.

Important Due Dates

1. Simplified Reporting Date
 - a. The last day of the **sixth** month of the current certification period.
 - b. This date is displayed on E&E's Program Eligibility screen.
2. MBR Due Date
 - a. The last day of the fifth month of the current certification period.
 - b. The date is displayed on the customer's MBR form.
3. 1052: Request for Information Due Date
 - a. Requested verification(s) must be returned 10 calendar days following the date of the request.

- b. The date is automatically populated on the generated 1052: Request for Information form.

Customer Submissions: Electronic MBR form

1. When the customer submits the MBR form through the Consumer Portal, an alert is generated in the E&E Worker Portal displaying “MBR form Received.”
2. The submitted MBR form is automatically uploaded to Case Documents.
3. The system interface between the Customer Portal and the Worker Portal automatically populates the updated information from the returned MBR form into the customer’s case in the E&E System.

Customer Submissions: Paper MBR form

1. When a completed paper MBR form is submitted to the LDSS, the case manager must update E&E with any reported new information.
2. The case manager must scan and upload the completed paper MBR form to the Case Documents in E&E.

Customer Submissions: MBR form with No Reported Changes

1. If the completed MBR form states there are no changes to report, a 1052: Request for Information Form is not required unless a discrepancy is identified in clearances.
 - a. If a discrepancy is identified, do not continue to process the case. You must follow the [reported changes process](#).
2. The case manager must process the MBR form, run eligibility, and confirm benefits to complete the process.

Customer Submissions: MBR notice and form with Reported Changes

In accordance with [7 CFR 273.12\(a\)\(5\)\(iii\)\(C\)](#), the MBR form sent to the customer must request from the household information on any changes in circumstances listed under [7 CFR 273.12\(a\)\(1\)\(i\)](#) through [7 CFR 273.12\(a\)\(1\)\(vii\)](#)

that results in reducing or terminating benefits. The MBR form is automatically issued in E&E and sent to customers. Based on any reported changes, the State agency will determine the household's continuation of benefits for the remainder of the certification period.

If a customer reports changes on the completed MBR form, verification may be required depending on the type of change. Customers may submit required verifications along with the MBR form.

1. Case Manager Review

- a. The case manager must review the MBR form to identify any missing information.
- b. If the case manager identifies that information is missing, the case manager must mark "not verified" in the verification field. Marking "not verified" will generate the 1052: Request for Information Form in E&E.

2. Verifying Changes

- a. The regulations at 7 CFR 273.2(f)(8)(ii) explain the verification requirements for changes reported during the certification period (which also applies to changes reported on a MBR form) as follows:
 - i. Verification of a change in income is only required when both the source and the amount of income has changed by more than \$50, unless the information is incomplete, inaccurate, inconsistent, or outdated.
 - ii. The State agency shall not verify total medical expenses or actual utility expenses which are unchanged or have changed by \$25 or less, unless the information is incomplete, inaccurate, inconsistent, or outdated.

3. Missing Required Verifications

- a. If a 1052: Request for Information Form is required, the verification field within E&E must be marked "Not Verified" to generate a 1052. Follow the steps detailed in the [E&E How-to-Guide: Generate Verification 1052 Form](#) located in E&E's Help section.
- b. Requested Mandatory Verifications Returned
 - i. All requested verifications are mandatory except verification

of expense deductions. In accordance with [7 CFR 273.12\(a\)\(5\)\(iii\)\(D\)](#) and [7 CFR 273.12\(a\)\(4\)\(v\)](#), if the household fails to provide sufficient information or verification regarding a deductible expense, the State agency will not terminate the household, but will instead determine the household's benefits without regard to the applicable expense deductions.

- ii. If the customer returns the requested mandatory verification(s), the case manager must update all applicable verification fields in E&E, run eligibility, and confirm benefits to complete the process.
 - iii. If the required verification process is not completed by the simplified reporting date, the case will close.
- c. Requested Mandatory Verifications Not Returned
- i. If the requested mandatory verifications are not returned by the simplified reporting date, the case will close.
 - ii. If the 1052 due date is after the simplified reporting date and the requested mandatory verifications have not been returned, the case will close.
- d. Requested Verifications Returned After the Simplified Reporting Date
- i. If the requested mandatory verifications are returned by the 1052 due date but after the case has closed, the case must be reinstated from the first day of the seventh month of the certification period.

Customer Submissions: Untimely MBR form

1. Completed MBR forms will not be accepted after the simplified reporting date.
 - a. The LDSS must **not** reinstate when the MBR form is received after the simplified reporting date.
 - b. Households submitting the MBR form after the simplified reporting date must submit a new application.

LDSS Delay: Untimely Processing of Timely MBR form

If a household submits a completed MBR form on or before the simplified reporting date but the LDSS fails to take the appropriate action on or prior to

the simplified reporting date, the household's SNAP case will close.

1. LDSS Process

- a. LDSS must reinstate the case within 30 days following the closure. The start date must be the first day of the month following the closure date.
- b. Follow the customer submission process based on [reported](#) or [no reported](#) changes.
 - i. 1052: Requested Information Not Submitted
 1. If a 1052 is needed and the customer fails to return the requested mandatory verification by the 1052 due date, the case must be manually closed by coding the Program Request screen under Closed/Denial Reason(s) as 552 (Failure to Give Information to Establish Eligibility).

Simplified Reporting

Elderly Simplified Application Project (ESAP) and Maryland Senior Nutrition Assistance Program (MSNAP) households are not required to submit a MBR form. These specified households are not simplified reporters. These households are change reporters.

In accordance with [7 CFR 273.12\(a\)\(5\)](#), simplified reporting households are required to report the following changes in circumstances for a periodic benefits review:

1. A change of more than \$100 in the amount of unearned income;
2. A change in the source of income, including starting or stopping a job or changing jobs, if the change in employment is accompanied by a change in income;
3. A change in the amount earned of more than \$100 a month from the amount last used to calculate the household's allotment, provided that the household is certified for no more than 6 months;
4. All changes in household composition, such as the addition or loss of a household member;
5. Changes in residence and the resulting change in shelter costs;
6. Changes in the legal obligation to pay child support;

7. For able-bodied adults subject to the time limit, any changes in work hours that bring an individual below 20 hours per week, averaged monthly; and/or
8. When a member of the household wins substantial lottery or gambling winnings (at or above \$3,500).

Clearances

1. All Household Members

The following clearances must be run for all household members and uploaded to Case Documents in E&E:

- a. State Verification and Exchange System (SVES)
 - i. Verifies the social security numbers (SSN), survivor's benefits, Supplemental Security Income (SSI), Social Security Disability Income (SSDI), and overnight requests for data.
- b. State On-Line Query Internet (SOLQ-I)
 - i. Allows State agencies real-time online access to verify SSN, survivor's benefits, SSI, and SSDI.

Note: SOLQ-I cannot be generated the same day the Individual Registration Number (IRN) is created. SOLQ-I must be pulled the next day.

2. Household Members 16 years and older

The following clearances must be run for all household members 16 years of age or older:

- a. State Verification and Exchange System (SVES)
 - i. Prison Match and 40 Quarters
- b. BEACON
 - i. Provides quarterly earnings for the most recent 6 quarters in the system and provides unemployment insurance benefit information.
- c. The Work Number (TWN)
 - i. Provides income and employment data and confirms the

- employment start date and end date.
- ii. TWN reports that are less than 30 days old should be used to verify wages and hours or anticipated income and hours.
- iii. TWN reports that are older than 30 days should be used to verify prior wages and hours.
- d. The Electronic Disqualified Recipient System (eDRS)
 - i. A nationwide database to which all states have access to check intentional program violation (IPV) penalties in other states.

Resources

[SNAP Manual Section, 410](#)

[SNAP Manual Section, 420](#)

[E&E How-to-Guide: Process Maryland Benefits Review](#)

[E&E How-to-Guide: Generate Verification 1052 Form](#)

Inquiries

Please direct policy questions to FIA Policy by completing the [FIA Policy Information Request Form](#). Montgomery County staff may submit their policy questions via email at fia.policy@maryland.gov. For questions related to E&E, please email fia.bsdm@maryland.gov.

cc: DHS Executive Staff
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