COVID-19 2020 Questions and Answers re: Cash and SNAP Programs
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Key: Questions highlighted in yellow have been added. Questions highlighted in blue have been revised.
Please see the COVID-19 Guide for Eligibility Workers for more detailed policy and system procedures

Applications

1. **Question:** Is the DWP Employment Plan requirement waived to approve applications?

   **Answer:** Given that the Diversionary Work Program is intended to provide intensive job search services to divert families from MFIP, in a period of rapidly escalating unemployment, the program is unlikely to benefit any applicants. Enroll all applicants for cash assistance directly on the Minnesota Family Investment Program.

2. **Question:** Are there any ideas out there to give paper applications to clients without having people come into the office? This is especially important for rural areas where internet access is poor.

   **Answer:** Paper applications can be put anywhere. For example, they can be put at libraries, grocery stores and anywhere else that the public may go. Counties and tribes are welcome to share ideas that you are doing. Please email them to DHS.SNAP-PAC.QA@state.mn.us.

   Workers are able to complete applications over the phone with the client. Workers should ask all the questions on the CAF and have the client answer verbally. Worker should review all rights and responsibilities that they are required to cover during an interview. On the signature line write that this application was completed by phone, the date of the phone application and the phone number of the client. Workers should then send a copy of the completed application to the client. In the interview CASE/NOTE indicate clearly on the first line that the application was accepted over the phone and a verbal signature was accepted.

3. **Question:** If a signature is not present on an application, can we accept a client’s verbal statement and add this to CASE/NOTEs?

   **Answer:**
   A verbal signature is acceptable. CASE/NOTE the action taken. If an application is completed over the phone, on the signature line write that this application was completed by phone, the date and time of the application and the phone number of the client. CASE/NOTE the signature was received verbally.

4. **Question:** Do we still need to complete a face-to-face interview for cash programs?

   **Answer:** No, do not require a face-to-face interview for cash programs at this time.

5. **Question:** What is the effective for accepting verbal applications over the phone?

   **Answer:**
   SNAP: March 1, 2020
6. **Question:** A client who previously closed for 100% sanction has reapplied. Do they need to work with ES for 30 days to regain eligibility for cash assistance?

   **Answer:** No. Participants have good cause due to the public health emergency and do not need to meet the 30 day compliance requirement for eligibility.

7. **Question:** How do we handle verifications for applications? Are we required to request verifications using the normal 10-day requirement or should we approve applications with verbal attestation so clients can get same-day approvals?

   **Answer:**

   CASH: Verify as much as you can electronically or through phone calls with third parties, such as employers. Allow signed personal statements as permitted under Combined Manual 10.03 – *(Verification Cooperation and Consent)* from applicants or participants. When you cannot get third party verifications electronically or through phone calls, use self-attestation for any required verification. This can be written or verbal attestation and should be documented in case notes.

   SNAP: Verbal verifications cannot be used at this time. Follow the current procedures for verifying mandatory and non-mandatory verifications found in all chapters of the Combined Manual 10 *(Verifications)*. Complete the following steps:

   1. Attempt to obtain verifications from the client either through mail or electronically if your office is closed.
   2. If you are unable to obtain verifications directly from the client, obtain an authorization for release signature from the client to obtain the verifications through phone calls to third party sources.
   3. If after all attempts to obtain the verification from the client and/or a third party source do not work, you can accept a client’s written statement as verification as a last resort. Other than for immigration verifications, please see below for more information.

8. **Question:** Should eligibility workers still send referrals to Employment Services?

   **Answer:** Yes, however, participants have good cause for non-compliance due to the public health emergency.

9. **Question:** Specifically for CASH, if we do not receive the needed verifications (not even verbally), do we still deny at 30 days?

   **Answer:** Yes, if you are not able to attain the verifications (including verbal attestations), deny the case. Attempt to verify as much as you can electronically or through phone calls with third parties, such as employers or landlords. When you cannot obtain verifications, use self-attestation for ANY required verification. Case note any verbal verifications received. Please see verifications section below and the Immigration Status Verification section of the COVID-19 Guide for more information regarding the required SAVE immigration verification process.
10. **Question:** Household moved to Minnesota on 03/25/20 from Oregon. The agency confirmed that SNAP benefits in Oregon ended on 03/31/20 and no TANF was received. Should the 30-day residency requirement be waived during the COVID-19 public health emergency?

**Answer:** No changes have been made to the residency requirement for MFIP, DWP and GA (CM 11.06.09).

11. **Question:** We have applications that have been pending since before the COVID-19 scare started. Are we to go back and review all pending cases and push them through if they meet the minimum requirements? If not please tell us what application date this starts on.

**Answer:**

CASH: For applications that remain pending or are pended after March 20, 2020, you can use the new requirements for verifying information to process the application. Do not reinstate applications that have been denied previous to March 20, 2020.

SNAP: At this time, there are no changes to verification requirements policies.

12. **Question:** Normally, if a client isn’t able to stay for an interview (or sent in their application), we send an appointment letter. If the client does not attend the scheduled interview, we send a Notice of Missed Interview. My questions are:

   a. Is anything changing regarding notice requirements?

   **Answer:**
   
   Cash: No changes are being made with the interview process. An interview is allowed over the phone in all situations.

   SNAP: No changes are being made to notice requirements. Continue to schedule interviews and send NOMIs if clients do not attend.

   b. If changes are not being made to notice requirements, how are workers determining what date to use for the appointment time, when all applications are mailed or faxed in, or submitted online?

   **Answer:** Notice requirements are not changing at this time. Follow your agency’s procedures for scheduling interviews and sending NOMIs.

13. **Question:** Our Agency is working from home and does not have access to printers. There is not a way for us to type on the electronic version of CAF in eDocs, will case notes re: verbal signature suffice?

**Answer:**

You should follow your agency’s process for processing CAFs over the phone. Document your process in CASE/NOTEs.

14. **Question:** Letter A states: "County, tribe, and community partner eligibility workers may complete an application over the phone when a potential applicant calls and expresses a need for help with cash. Eligibility staff should ask the caller if they wish to apply for assistance. If yes, complete the Combined Application Form (CAF) on the phone with the applicant, and CASE/NOTE that the applicant confirmed the accuracy of the information." If a call comes into an office at 4:15pm and our office closes at 4:30...
PM, can we set a PND1 application by filling out the CAF1 the date of the call and set the phone interview for the next business day?

**Answer:**
Yes; capture the information you need to set the application date (CAF 1). Make sure to case note.

15. **Question:** If a client calls to say they want to apply for benefits, but we can’t call them back until the next day to fill out the CAF and complete the interview, is the date of application the date the client called to originally request benefits or the date we call them back to complete CAF and interview?

**Answer:** If you have the client’s name and contact information, the date of application is the date they contacted the agency to inquire about applying for benefits.

16. **Question:** SSA has closed their offices and limited services due to COVID-19. The SSA is not accepting new applications for SSN at this time. Therefore, some applicants, including people with refugee status, asylum status, Iraqi & Afghani Special Immigrant Visa, Victims of Trafficking, and Cuban/Haitian Entrants are not able to provide proof of applying for a SSN. How do we proceed in processing their application?

**Answer:** Good cause can be granted for not applying for a Social Security Number at this time and the participant can receive benefits, if they meet all other eligibility requirements. On the STAT/MEMB panel use the verification code "A" (Applied for SSN). Follow the guidance in POLI/TEMP TE02.08.081 (DAIL Message – SSN Not Verified) when using this code.

17. **Question:** If an applicant is over income for cash (and we did a phone application with verbal signature and verifications) and eligible for SNAP, can we approve or do we need a signed application for approval since it is no longer MFIP? If so, what is the date of the application since we cannot take an application over the phone for SNAP?

**Answer:** Effective March 1, 2020 and ongoing, a verbal signature can be accepted for the client to apply for SNAP. If a cash application was taken verbally prior to being able to accept a verbal SNAP application, call the client and confirm that the client would like to add SNAP to their application. Be sure to ask the client any SNAP related questions if they were not asked during the cash application interview. CASE/NOTE the date, time and client’s phone number of the verbal signature and verbal answers given for the SNAP related questions asked.

18. **Question:** For cash programs, have any of the requirements to apply for SSI been lifted or has the timeline been extended at all (can we give the 6 months to do so?)?

**Answer:** The requirement to apply for other maintenance benefits has not been lifted for cash programs. Clients should still apply for SSI if they are able to do so. However, workers should apply good cause exemptions if clients are unable to obtain necessary medical appointments, documentation, or interact with Social Security Administration staff due to limited access as a result of the public health emergency.
Do not delay approving cash benefits; approve cash benefits and inform the applicant that they should apply for SSI.

19. Question: Application was received today, 3/31/20, and the participant is requesting cash and claiming he will be doing out-patient treatment. Do we need to obtain a medical opinion form to verify he is unable to work? Or do we accept his self-attestation?

Answer:
GA: No changes have been made to GA basis of eligibility. Follow the provisions in CM13.15.12. All other cash programs: Verbal verifications are acceptable.

20. Question: Can an agency approve MFIP without allowing client time to provide completed child support referral forms? Verbal verifications can be accepted for MFIP at this time due to COVID-19, can child support referral forms also be verbally completed?

Answer: Yes, child support referral forms can be completed verbally. Clients are not required to complete child support referral forms prior to applications being approved. (CM10.18.01)

Appeals
1. Question: What do agencies do about scheduled appeals where workers are working remotely without cell phone access at this time? Can they be rescheduled?

Answer: If a participant or county representative is unable to attend, follow the current appeals good cause process.

Case Reviews
1. Question: Will SNAP Quality Control (QC) and Management Evaluation (ME) relax their case review requirements at this time?

Answer: The ME team will not be reviewing ABAWDS this year. In addition, the SNAP ME will be reaching out to the agencies currently participating in the 2020 SNAP-ME review to discuss any changes to the process. QC is currently conducting all interviews over the phone. There are no other changes to the case review process at this time.

Client Access
1. Question: Are considerations being made to waive months on MFIP during this peacetime state of emergency?

Answer: Yes, considerations are being made at the federal level. However, at this time, we are not waiving the TANF time limit.

2. Question: What is the name of the law that was recently passed by Congress?
Answer: The Families First Coronavirus Response Act (Public Law 116-127). It was signed into law on March 18, 2020.

3. Question: What if counties or tribes do not have a drop box outside for clients to drop paperwork off?

Answer: DHS is encouraging counties and tribes to set up a drop box if they do not have one. Counties and tribes that use drop boxes should share the details of how they are used so the information can be shared statewide. Please email any information you would like to share to DHS.SNAP-PAC.QA@state.mn.us. In addition, if you would like a letter from DHS encouraging that you have a drop box we can provide that.

4. Question: Some food banks are closing due to safety concerns. Will there be more funding available for SNAP to cover the increase needs due to these closures?

Answer: The Minnesota Food HelpLine (1-888-711-1151) can connect individuals and families to food shelves, meal programs, and food resources in their community. You can also find a listing of food shelves, meal programs, and other food resources on the Hunger Solutions Minnesota website.

The Families First Coronavirus Response Act includes:

- A general provision that allows the Department of Agriculture to approve state plans to provide emergency SNAP benefits to households with children who would otherwise receive free or reduced-price meals if not for their schools being closed due to the COVID-19 emergency. In order to be eligible, the child’s school must be closed for no less than 5 consecutive days.
- $500 million for the Special Supplemental Nutrition Program for Women Infants and Children (WIC) to provide access to nutritious foods to low-income pregnant women or mothers with young children who lose their jobs or are laid off due to the COVID-19 emergency.
- $400 million for The Emergency Food Assistance Program (TEFAP) to assist local food banks to meet increased demand for low-income Americans during the emergency.
- In the event of a COVID-19 public health emergency declaration by the Secretary of Health and Human Services and a COVID-19 emergency or disaster declaration by a state, the Secretary of Agriculture:
  - shall provide, at the request of a state agency, emergency allotments to SNAP households to address temporary food needs not greater than the applicable maximum monthly allotment for the household size, and
  - may adjust issuance methods and application and reporting requirements to be consistent with what is practicable under actual conditions in affected areas.

The Minnesota Legislature has approved $9 million for the Minnesota Food Shelf Program to address food banks, food shelves, and transportation needs during the COVID-19 pandemic.

5. Question: Can a county social service agency close completely to the public?

Answer: The state has not yet issued guidance on this. This is a county decision at this time. Please refer to Governor Walz Emergency Executive Order 20-20 for Critical and Essential and your county or tribe for further guidance.
6. **Question:** Are there issues with eligibility workers working from home?

   **Answer:** DHS does not have an issue with this. Be sure that you are following data privacy laws, ensuring participants’ information is protected.

7. **Question:** If a client’s case is converted from DWP to MFIP without the MTAF, will these months count against the TANF time limit?

   **Answer:** Yes, any months a client receives MFIP will count against their TANF time limit, unless they meet a reason to not have a month count.

8. **Question:** Are we still approving significant changes?

   **Answer:** Yes.

9. **Question:** During the COVID-19 emergency, can a client use a significant change more than twice in 12 months?

   **Answer:** Not at this time.

10. **Question:** Can a Case manager from our Public Health unit be the client’s SNAP authorized representative without anything in writing from the client - just a verbal confirmation from the client?

    **Answer:** There are three types of AREPS: 1) A person authorized to act on behalf of a household in the application and reporting process, 2) A person authorized to obtain a person’s SNAP benefits on their own EBT card, and 3) A person authorized to use the SNAP benefits on the client’s EBT card. This answer applies to AREPs designated in #2 and #3 above.

    The client should choose someone they trust to access their EBT benefits. The designated AREP cannot be disqualified for an Intentional Program Violation, be a person involved in the certification or issuance processes of SNAP eligibility, or be a retailer who are authorized to accept SNAP benefits. This designation can be made verbally over the phone. Please review the COVID-19 Guide for steps in how to complete this process and what information must be given to the client and the newly designated AREP.

11. **Question:** Can SNAP clients now use their benefits to buy diapers and toilet paper. Is this true? If yes, can they start using their benefits now for these items or do we need FNS/USDA approval?

    **Answer:** No changes have been made to what clients can use their SNAP EBT benefits to purchase. For a list of items that can be purchased with SNAP EBT benefits, see the Eligible Food Items article on FNS’ website.

12. **Question:** For the 15% increase for Housing Support, is any action needed for workers to approve this?

    **Answer:** Workers do not need to take any action regarding the temporary 15% increase. The increased payments to Housing Support providers will be issued directly to providers and tracked by DHS outside of MAXIS and MMIS. Specific information regarding the issuance, allowable expenses, and tracking of the
temporary 15% increase will be communicated to providers by the county or tribal Housing Support contact person who oversees their Housing Support agreement.

13. **Question:** We received a phone call from a participant who is currently active on SNAP, stating that she was told she is also eligible for emergency SNAP. I am really confused as to what she is referring to, other than expedited. She is not eligible for expedited since she is currently active. Is there another program for SNAP out there that we are missing?

**Answer:** This is a program that is approved by FNS to increase the SNAP allotment to the maximum amount for the unit's size. This has been approved for a two month time period. DHS is working on a plan to issue these supplements to clients. No action is needed from workers at this time.

14. **Question:** For sanctioned MFIP cases for March and April should they continue to be vendor paid?

**Answer:** Policy surrounding mandatory vendor payments has not changed. (CM24.09)

15. **Question:** Are we waiving mandatory vendor pay for MFIP drug felons during the COVID-19/public health emergency?

**Answer:** Policy surrounding mandatory vendor payments has not changed. (CM24.09)

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**DWP to MFIP Conversion**

1. **Question:** The bulletin states to convert all DWP cases to MFIP by May 1st if they meet eligibility requirements. If they do not meet MFIP eligibility requirements, do we keep them on DWP through their 4th month even if that extends past May 1st?

**Answer:** If the client is not eligible for MFIP beginning May 1st, do not convert the case from DWP but allow the family to receive their 4th month of DWP benefits. An auto-close job will run and close the case after 4 months of DWP eligibility.

2. **Question:** I have a client whose DWP closed 2/29/20 due to DWP disqualification. 03/20 would have been her fourth month DWP. Should I be reinstating and approving 03/20 DWP and then converting the case to MFIP for 04/20?

**Answer:** No, the case should not be reinstated.

3. **Question:** If by converting DWP to MFIP it reduces benefits since the client is employed, should we still convert the case to MFIP?

**Answer:** Yes. Beginning May 1st, 2020, we will only look at MFIP eligibility.

4. **Question:** Client was approved for DWP prior to guidance to open MFIP. Now the client is receiving $442 per week unemployment, she was receiving a full DWP grant, do we open MFIP for May and flat the income out?
Answer: If the client was approved for DWP and is not eligible for MFIP, continue on DWP. If the client is eligible for MFIP, convert the case. Refer to the COVID-19 Guide for how to process this case.

Disqualifications

1. **Question:** Client is pregnant and applying for SNAP. She is the only person in the household and is disqualified until August. Are we changing any disqualification rules due to COVID-19?

   **Answer:** No rules are changing for SNAP disqualifications at this time.

2. **Question:** I have a case that has a disqualification set to start for 4/20 for member 01 due to signed IPV.

   **Answer:** Policy on disqualifications remains unchanged. Follow CM25.24.06.

3. **Question:** We have a case that was disqualified due to fraud in March and the disqualification is scheduled to begin 4/2020. Is there any impact on those cases? Should we continue to implement the disqualification or should that be delayed?

   **Answer:**
   
   CASH: Yes, continue to implement the disqualification.
   
   SNAP: No changes are being made to the rules regarding disqualifications at this time.

4. **Question:** If we have clients that are currently disqualified due to fraud. If they try to reapply for programs should we continue the disqualification or will the time be waived due to the current situation?

   **Answer:** Disqualifications are not being waived at this time.

EBT

1. **Question:** With offices closed to the public, are there any changes to our obligation to issue EBT cards for expedited cases that don’t have active accounts?

   **Answer:** If a county or tribal office is closed to the public but the agency needs to issue a card immediately agencies should mail the EBT card to the client. See the SIR Announcement on 03/24/2020 for more information.

2. **Question:** Currently SNAP recipients cannot use their EBT cards to make on-line grocery orders/purchases but clients would like to do this, especially if they are at high risk and can’t go in to stores. The stores I have spoken with say the reason they cannot use a manual process to take EBT on-line is because it is not compliant with MN state security guidelines. Are these security guidelines able to be adapted to accommodate?

   **Answer:** We have been in communication with the Grocers Association about this and are pursuing federal approval options. We are working on making this possible but it will take time. Recipients can
contact their county eligibility worker to request an AREP be added to their case. The AREP will then be issued an EBT to be used on behalf of the SNAP recipient.

3. **Question:** Can a case manager from our public health unit use a client's EBT card to purchase groceries for them if the client is in isolation/quarantine? If so, can they use the client's card without getting an additional card for themselves?

**Answer:** Yes. The client would need to contact their county or tribal eligibility worker and request to have the case manager added as an AREP.

### Employment Services and SNAP E&T

1. **Question:** What types of Wi-Fi are acceptable for security purposes when using WF1?

   **Answer:** Security procedures are unchanged regarding accessing DHS/DEED systems such as MAXIS/WF1. ES agencies should check with their agency IT person and/or their county regarding accessing MAXIS/WF1 to ensure that security procedures are in place whether they are accessing it from their home Wi-Fi or a public Wi-Fi network.

2. **Question:** What is guidance around sanctions? Shall we not impose sanctions/cure existing sanctions, or cure on a case by case basis?

   **Answer:** Minnesota statute (256J.57, subd. 1, clause (6)) recognizes an emergency situation as a good cause reason for failure to comply. The federal and state declarations of emergency apply to all Minnesotans. Do not impose sanctions on MFIP or RCA households and do not disqualify any DWP households during the public health emergency. Remove sanctions and issue supplements for March and do not impose new sanctions beginning 04/01/2020.

3. **Question:** Is it acceptable to conduct orientations and case management over the phone? Examples include utilizing the phone, email and texts. Text messages may include job leads, job fairs, upcoming trainings, community resources and appointment reminders. They will not include any identifiable information, will not be done using personal cell phones and will not include any Business Sensitive Information or Protected Health Information.

   **Answer:** This is acceptable and is the type of flexibility we are encouraging at this time. Refer to the memo sent out 03/17/2020 for MFIP/DWP and to the e-mail sent out 3/16/2020 for SNAP E&T.

4. **Question:** What is the guidance around activities, participation hours and log collection? Can we relax the participation requirements, if so, in what ways?

   **Answer:** Follow current guidelines about participation and compliance. Allow flexibility around how logs can be turned in, for example via a photograph of the log and as a text attachments instead of a physical paper mailed in. Remove current sanctions and do not impose new sanctions during the public health emergency.
SNAP E&T providers are encouraged to move participants into case management-oriented activities such as Supervised Job Search and Supervised Job Search Training. SNAP E&T does not have a minimum hourly requirement and all SNAP E&T ABAWDs have been granted good cause for the duration of this emergency. Providers are encouraged to focus on maintaining contact, supporting participants’ motivation to work, and informing and enrolling new SNAP recipients who may need support at the conclusion of this emergency.

5. **Question:** Since schools are closed statewide can this be considered good cause for non-compliance?

   **Answer:** If school closing creates any good cause reasons for failure to comply as outlined in the Combined Manual 28.18 (Good Cause for Non-Compliance – MFIP/DWP), 28.18.01 (MFIP Good Cause – Caregivers Under 20), 28.18.02 (MFIP Good Cause – Child Care) and 30.12.06 (RCA Employment Services Good Cause Claims) good cause exists.

SNAP E&T participants have been granted good cause.

6. **Question:** It will be challenging to get updated Medical Opinion Forms for existing extensions/FSS clients. Can those be extended for a period of time if up for review? What about for new extensions/FSS?

   **Answer:** We recognize the challenge with getting updated Medical Opinion Forms for existing FSS clients. We recommend extending their current eligibility and reviewing again in 6 months. For extension cases, since the face-to-face assessments cannot occur, accept self-attestation from the client to extend current Medical Opinion Form if applicable and maintain current coding on DISA and EMPS. If no extension category is identified, extend under Unemployable through the duration of the public health emergency. Code “Member Meets Hard to Employ Category” field on EMPS with “UN”. On TIME, code Extension Reason as “05”. Create a TIKL for six months to review their status for a continuing extension.

   If a family is due to have their extension reviewed for continuation during the public health emergency, automatically renew their extension if you believe their situation remains unchanged. Extend DISA end date out six months, if needed based on extension reason. If there is question about whether they continue to qualify under their current extension reason, submit a PQ. Do not delete existing DISA panels or remove SMC or Needed in Home coding from EMPS because this may impact their eligibility for the Housing Assistance Grant.

   If a family who has already used 60 months of MFIP or TANF assistance applies for MFIP, find them eligible for extended MFIP under the unemployable category if documentation is not available for another extension reason.

7. **Question:** For DWP plans, can we use a text message for a client to confirm they are agreeing to the program requirements?

   **Answer:** We are allowing verbal signatures at this time. Employment Counselors should review the EP with the client over the phone and note in the signature box that the EP was reviewed “by phone” and the date it was reviewed. A copy should be sent to the client. And this should be case noted. Current DWP cases should be converted to MFIP by 05/01/2020.
8. **Question:** How can clients continue to get their work participation hours if schools are closed?

**Answer:** If a client cannot complete their work participation hours as listed in their employment plan due to schools being closed, this is considered good cause for non-compliance. See good cause reasons outlined in the Combined Manual 28.18 (Good Cause for Non-Compliance – MFIP/DWP), 28.18.01 (MFIP Good Cause – Caregivers Under 20), 28.18.02 (MFIP Good Cause – Child Care) and 30.12.06 (RCA Employment Services Good Cause Claims).

9. **Question:** For new DWP applicants, can we extend the period to get the employment plan back to eligibility workers so we do not disqualify participants that are in the 10 day window? We will be doing our process via mail/return postage mail?

**Answer:** There will be no new DWP applicants during this time. All new applicants who would be DWP eligible will be deemed unemployed and be approved on MFIP. We are allowing verbal signatures for EPs at this time. Employment Counselors should review the EP with the client over the phone and note in the signature box that the EP was reviewed “by phone” and the date it was reviewed. A copy should be sent to the client and this should be case noted.

10. **Question:** For individuals who were previously mailed a NOITS with compliance due post waiver date, do we still impose a sanction or do we case note/approve good cause?

**Answer:** Do not impose sanctions on MFIP or RCA households and do not disqualify any DWP households during the public health emergency. CASE/NOTE that good cause was granted due to the public health emergency.

11. **Question:** What should we do for participants who need to be enrolled and who have a sanction pending or are currently in sanction for failing to meet with worker and develop a plan? We know we need to be offering to meet electronically/over phone to cure this but should they remain in sanction or be sanctioned for not doing the enrollment/plan piece?

**Answer:** Do not impose sanctions on MFIP or RCA households and do not disqualify any DWP households during the public health emergency. Remove sanctions and issue supplements for March and do not impose new sanctions beginning April 1, 2020.

12. **Question:** For new referrals what do we do if someone does not follow through with meeting electronically/over phone to develop a plan and enroll in the program?

**Answer:** Participants have good cause for non-compliance through the duration of the public health emergency.

13. **Question:** What are we to do with new enrollees? Are we to write plans as we would normally but then allow for good cause when/if they aren't able to comply?

**Answer:** Correct. Continue to develop plans as normal and allow good cause for noncompliance through the duration of the public health emergency.
14. **Question:** The commissioner temporarily waived a requirement for MFIP participants experiencing family violence to meet with both an employment counselor and a family violence specialist if the family violence specialist cannot be reached. The commissioner also directed employment counselors to avoid requiring activities that participants indicate would be dangerous in their situation, such as face to face meetings. (Is this second statement specific still to those experiencing family violence or to any/all MFIP participants?)

**Answer:** This statement refers to participants who have the Family Violence Waiver or who are pursuing the Family Violence Waiver. For face to face requirements for all participants, refer to the memo sent out 03/17/2020 for MFIP/DWP and to the e-mail sent out 3/16/2020 for SNAP E&T.

15. **Question:** Is the COVID-19 an appropriate reason to use the Holding activity option for MFIP or RCA participants who are unable to complete their activities at this time due to everything closing?

**Answer:** Counties and tribes have the discretion to decide how to use the holding activity in Workforce One. If participants are not able to complete the activities in their Employment Plan, grant good cause and keep those activities open.

For SNAP E&T, providers may use the holding activity but are reminded that this activity is not considered a reimbursable activity. As always, participants who fall out of contact for 30 days or more must be exited from SNAP E&T.

16. **Question:** How do we provide support services when our offices are closed?

**Answer:** Agencies should develop an interim policy for how to make support services available to participants during this time. If you are a contracted agency, work with your county, Tribal Nation and community partners to develop these processes. If you are a SNAP E&T provider contracted with DHS, please let us know if you plan to alter your support service process.

- Bus/gas cards may be mailed to participants. Participants do not need to physically sign for the card but receipts must be tracked. This could be a digital acknowledgement from the participant followed by a case note in WF1. Participants may come to providers to pick up support services where necessary and appropriate health precautions should be taken.
- For SNAP E&T purchases of items online to be delivered to participants is acceptable but receipts must be maintained and costs must be reasonable and necessary.
- Track all expenditures closely. Since the current situation will require flexibility and creativity it is important to keep accurate and detailed notes to back up expenses.
- Carefully case note all support service needs. This will assist your agency in demonstrating that costs were reasonable and necessary.

17. **Question:** How should we work with participants who are still working but whose childcare center has closed?

**Answer:** All participants have good cause and should not be sanctioned for the duration of the public health emergency. If there is alternate child care available, work with the participant to enroll in the new child care center.
18. **Question:** Should we scan blank forms in EDS if we get a verbal signature? We want to make sure documents are missing for audits.

**Answer:** No, do not scan blank documents into EDS. Thoroughly case note that you received a verbal verification.

19. **Question:** Will the Self-Support Index be waived for 2020?

**Answer:** No.

20. **Question:** Do ES workers need to send status updates to lift March and April sanctions or will Eligibility Workers do this automatically?

**Answer:** This process varies by county. ES workers should send status updates to lift March and April sanctions already imposed for good cause to ensure that the client receives a supplement for those months. ES workers may also utilize MAXIS Inquiry access to determine if the sanction has already been lifted by the Eligibility Worker.

21. **Question:** What do we do with participants who won’t enroll (attend overview, complete an initial appointment)?

**Answer:** Participants have good cause for not attending overview or developing an Employment Plan. Do not sanction participants and lift all current sanctions as of 3/2020.

22. **Question:** Can we verbally confirm participation hours?

**Answer:** Yes. Thoroughly case note that you obtained confirmation of participation hours from the participant over the phone.

23. **Question:** Should Employment Plans be written as Reduced Hours – Good Cause for the duration of the public health emergency?

**Answer:** If you are developing a new Employment Plan and the participant is unable to meet the minimum hourly requirement due to COVID-19, then a Reduced Hours – Good Cause Employment Plan would be appropriate. You may also grant good cause without a Reduced Hours – Good Cause Employment Plan in place.

24. **Question:** Should we send in notices to end CCAP for clients who are no longer doing activities?

**Answer:** No. Continue to inform the child care worker of changes, including any temporary breaks or if an activity has ended. Child care workers will determine continued eligibility and service authorizations for CCAP.

25. **Question:** Although support funds cannot be used for groceries, is ES allowed to issue Target/Walmart cards to help with rising cost of kids being at home. Like an emergency card of up to $100 per household to help with essentials?
**Answer:** Follow agency and county policies regarding support services. Refer to ESM 12.6 for more information about allowable expenditures for employment services.

26. **Question:** Will participants who transition from one FSS extension category to Unemployable (due to an MOF that cannot be obtained) still receive the housing grant?

**Answer:** We recommend extending their current FSS extension category and reviewing again in 6 months. This will maintain their MFIP eligibility, including the MFIP Housing Assistance Grant.

If there is question about whether they continue to qualify under their current extension reason, submit a PQ. Do not delete existing DISA panels or remove SMC or Needed in Home coding from EMPS because this may impact their eligibility for the Housing Assistance Grant.

27. **Question:** Should we notify participants that we do not need them to turn in job logs (or other activity logs)?

**Answer:** No, advance notification is not required. If activity logs are submitted, case note and track the hours as normal. If participants do not submit logs, grant good cause, and do not impose a sanction. Case note the actions.

**External Communications**

1. **Question:** Will DHS continue to host calls or webinars to address ongoing questions from counties and tribes?

**Answer:** Yes. DHS is planning to host a webinar once per week unless we hear that this is too time consuming from counties and tribes. There will be a survey sent soon and DHS will incorporate the feedback from this survey. If you would like these meetings held more than once per week, please email DHS.SNAP-PAC.QA@state.mn.us.

2. **Question:** Will there be a call with the GA policy?

**Answer:** GA and MSA policy changes will be communicated as soon as the Legislature acts on our recommendations.

**Funding**

1. **Question:** Will there be more funding for Emergency Assistance/Emergency General Assistance?

**Answer:** The state legislature is looking at options for funding. At this time, we do not have additional funds available but will release more information when it becomes available.

**Income and Budgeting**

1. **Question:** Clients are calling asking for more SNAP due to their job ending, can we prospectively budget zero income for next month when we do not know how long they will not be working?
Answer: Follow current prospective budgeting policies that can be found in the Combined Manual 22.03.01.03 (Prospective Budgeting – SNAP Provisions). For instance, when the unit is unsure of the amount of income or when it will be received, count only the income that the the county agency or Tribal Nation and the client are reasonably certain will be received during the certification period. Document this information in MAXIS CASE/NOTEs. For verification procedures follow Combined Manual 10 (Verification) and 10.03 (Verification - Cooperation and Consent). We will provide additional guidance once we have it available.

2. Question: Do we have any information on Census workers and budgeting their income and budgeting changes to their income?

Answer: This is still considered counted earned income. The budgeting and verification requirements have not changed. There were two SIR announcements posted on how to treat this income. They were posted on 02/04/2020 and 02/13/2020.

3. Question: For self-employment, clients are currently not able to switch from the taxable method to the 50% of current gross income method until recertification. Can we waive this requirement?

Answer:
CASH: We are not waiving this requirement at this time. Clients can switch to the 50% if there is a major change. See the Combined Manual 17.15.33.03 (Self-Employment – Convert Inc. to Monthly Amt – Cash) and see the definition of major change in the Combined Manual 2.39 (Glossary – Lump Sum..).
SNAP: We are not waiving this requirement at this time. Clients will need to continue to use the taxable method until their next recertification.

4. Question: SNAP applicant states she must pay $25 per week to hold their spot at daycare while she is laid off due to COVID-19 and is home with the children. Q1: Is this an allowable deduction on the SNAP budget? Q2: If so, does the reason for lay off need to be verified? Q3: If lay-off turns out to not be caused by COVID-19, is it still an allowable deduction?

Answer: If the client is temporarily laid off due to COVID-19 and the business is not being considered essential, this can be allowed as a deduction. If the client is permanently laid off, then this can be allowed as a deduction if they are looking for work. Accept a client's verbal statement regarding the reason for the layoff or that they are job searching to receive the deduction. In addition, dependent care deductions do not need to be verified unless questionable. Document the information the client provided verbally in CASE/NOTEs. Verification of the job ending is a mandatory verification for SNAP eligibility, but is not needed for the dependent care deduction.

5. Question: Client works for a restaurant. They are going to pay their employees Emergency Pay of 50% of their income during the COVID-19 Emergency if their employee does not have scheduled hours for a week at a time as they are paid weekly. They will be taking taxes and other deductions except arrears from the pay. Is this unearned or earned income for SNAP?

Answer: Count this as earned income.
6. **Question:** For MFIP, are we using retrospective budgeting or prospective budgeting?

**Answer:** There have been no changes to the budgeting cycle. (CM22.06, CM22.03.01).

7. **Question:** Should we be budgeting Unemployment Compensation if clients have not yet started payments but have received their potential benefit notices? Or, if at time of interview they have not received a payment, do we not budget this?

**Answer:** Do not budget Unemployment Insurance income until the client actually starts receiving it. Follow the guidance in the bulletin and COVID-19 Guide for case specific processing steps.

### MAXIS

1. **Question:** How are workers supposed to code the verification fields when a client’s written self-attestation is used? For example, if an employer is closed and verification cannot be obtained that the client is no longer working there. Should it be "Other" and then a CASE/NOTE?

**Answer:** If a client’s written self-attestation is accepted as verification, use the verification code on the panel that indicates "other." Clearly state in CASE/NOTEs that a client’s written self-attestation was accepted as verification. As a reminder, a client’s statement is not considered a collateral contact.

2. **Question:** For new applications that would have been DWP that need to now be approved as MFIP, how do we code MAXIS?

**Answer:** Use the code of "UN – Unemployable" on STAT/EMPS in order to get MFIP eligible results if no other Unlikely to Benefit or FSS category applies [CM08.06.24 – DWP Conversion or Referral to MFIP]. Maintain this coding for the duration of the public health emergency.

### MFIP Extensions

1. **Question:** What about MFIP extension cases with an expired Medical Opinion Form (MOF)? Would they be able to stay open and if later found to not have an extension reason, will overpayment be changed?

**Answer:** Continue the extension under the current extension reason, if that situation still exists. Additionally, add the UN - Unemployable coding to EMPS and approve MFIP. If there is question about whether they continue to qualify under their current extension reason, submit a PQ. No overpayments will be charged if someone is approved under this category during the COVID-19 emergency.

2. **Question:** Do we still need to send in an extension form to the extension team for participants reaching their 60th month?

**Answer:** This process varies from county to county. Eligibility workers have been instructed to allow extension to continue either as they stand currently or under the Unemployable category.

3. **Question:** Are considerations being made for families that apply for MFIP but have used their 60 months to be eligible or would the same extension rules apply?
**Answer:** If a family who has already used 60 months of MFIP or TANF assistance applies for MFIP, find them eligible for extended MFIP under the unemployable category if documentation is not available for another extension reason.

If a family is due to have their extension reviewed for continuation during the public health emergency, automatically renew their extension if you believe their situation remains unchanged. Extend DISA end date out six months, if needed based on extension reason. If there is question about whether they continue to qualify under their current extension reason, submit a PQ. Do not delete existing DISA panels or remove SMC or Needed in Home coding from EMPS because this may impact their eligibility for the Housing Assistance Grant.

4. **Question:** Can the face-to-face meeting requirement 180 to 60 days prior to MFIP closing be waived to determine if a client meets an extension?

**Answer:** Do not require face-to-face interviews at this time.

5. **Question:** If someone is unable to meet hour requirements for the employed extension due to COVID-19 closures, how does this affect the extension? Does it stay open indefinitely because they have good cause for not meeting hours, or is it still just 30 days to find a new job?

**Answer:** During this period of time, participants who lose employment should be considered unemployable due to the emergency situation. Participants whose hours are reduced can be granted good cause.

**Overpayments**

1. **Question:** Should we be computing overpayments for months prior to the COVID-19 emergency in which we now have the documentation on file?

**Answer:** Yes, continue to calculate overpayments and enter claims into the system following current policies and procedures.

**Processing Deadlines and Negative Actions**

1. **Question:** Are there any changes to 10-day cutoff?

**Answer:** No changes have been made to our processing deadlines at this time.

2. **Question:** Auto-close notices for 04/01/2020 were not sent. Will they be sent?

**Answer:**

CASH: No. We are asking at this time that workers do not take negative actions on these cases as the client did not receive the appropriate notice of adverse action for the month of April. Cases already approved to close prior to 10-day cut-off (and the announcement to not take negative action for 04/01/2020) will still close. No additional action is needed at this time.
SNAP: Auto-close notices were not sent for April and will not be sent however, any expedited SNAP cases that were approved with postponed verifications will auto-close for 04/01/2020. Also cases that were set to close for other reasons, will still close for 4/1/2020. New negative actions cannot be taken for April since it is past 10 day notice.

3. **Question:** For cases that were already approved to close for 04/01/2020, do we need to approve these cases to stay open? For example, if mandatory verifications were not returned, if the client is ineligible or moved into a facility?

   **Answer:** No. These cases will remain closed as of 04/01/2020. No additional action is needed at this time.

4. **Question:** If a client requests their case be closed, can we close the case?

   **Answer:** Yes, close the case for the next available month, allowing for proper notice. Please see the Combined Manual 26.12.09 (Adequate Notice) and 26.12.18 (Cash Cut-Off Notice).

5. **Question:** For SNAP: Application was approved Expedited with postponed verifications and verifications were not submitted, do we continue to let the case close for April?

   **Answer:** Yes, the case will still auto-close for April 1, 2020. No further action is needed at this time unless the client provides the mandatory verifications to prevent the case from closing.

6. **Question:** Can we still close SNAP for May to approve MFIP cash and food?

   **Answer:** Yes, you can still close SNAP to approve a MFIP cash and food package. No changes to imposing negative actions for SNAP have changed at this time.

7. **Question:** Are there any reasons why a case should close?

   **Answer:** Yes, for cash, case closure reasons are outlined in corrected bulletin 20-68-12C

   **CASH:** Closure of cash cases should occur in the follow situations.
   - The household moves out of Minnesota.
   - A fraud disqualification occurs.
   - A client requests closure.

   **MFIP case closures should also occur in the following situations.**
   - Member 01 leaves the household, including for incarceration (unless they meet temporary absence – CM 14.09)
   - A pregnant woman on MFIP with a “pregnant woman basis” reports that her pregnancy did not result in a live birth.
   - No children remain in the household, including when the youngest child in the household turns 18 or 19 and has graduated.
   - Counted income exceeds the MFIP transitional standard.

   **RCA case closures should also occur in the following situations.**
• The entire household begins receiving SSI.
• The RCA unit becomes MFIP eligible.
• The eight-month timeline has been exhausted.
• Counted income exceeds the RCA income standard.
• Participant leaves the household, including incarceration and death.

GA case closures should also occur if the participant:
• Becomes eligible for SSI or other maintenance benefits
• Violates the drug felon policy
• No longer meets a GA basis of eligibility
• Leaves the household, including incarceration and death.

MSA case closures should also occur if the participant:
• Violates the drug felon policy
• No longer meets a MSA basis of eligibility (i.e. they no longer receive SSI)
• Leaves the household, including incarceration and death ((unless they meet temporary absence – CM 14.09)

Housing Support case closures should also occur when a client reports that they are no longer living in their Housing Support setting.

SNAP: No changes have been made to the negative action policies for SNAP.

8. **Question:** If a client calls to report that the children have moved out of the home and the case is no longer eligible for MFIP/DWP, should we close the case?

   **Answer:** Yes.

9. **Question:** When adding people to MFIP, do we add them and their income as normal and only approve new results if there would be an increase to benefits? For example, a baby is born and we are adding newborn and newborn's father - newborn's father has income that would result in a decrease to the MFIP grant. Add the baby and Father but not approve the new results?

   **Answer:** Follow the usual process for adding members to the MFIP unit, but do not require an addendum and allow for verbal verification when documentation is not available [CM08.06.06 – Adding a Person to the Unit – Cash]. Approve new MFIP eligibility results including the new member and any income reported.

10. **Question:** I have a suspended MFIP case for April. Would they stay suspended unless they send in documentation showing a reduction in income?

    **Answer:** Yes, the case will remain suspended for April and should be reviewed for May. If there is a reduction in income the participant can verbally attest to this; no documentation is needed. CASE/NODE actions taken.
Should this case close for May if there is no reduction in income? Yes.

Note: MAXIS will allow additional suspension months until a new approval is completed. The housing grant will continue to be issued to eligible households during suspension. It is important that the Eligibility Worker take action on this case for May.

11. **Question**: How should workers handle the results of a fraud investigation—especially if it causes a negative action?

   **Answer**: No changes have been made to this policy. Act on the results of the fraud investigation.

12. **Question**: MFIP CASE – child is approved for SSI. First payment 4/1/20. Can this child be removed from MFIP and added Uncle Harry Food for May?

   **Answer**: Yes, in this situation it would be appropriate to remove the child from the MFIP household and evaluate for Uncle Harry food benefits.

13. **Question**: What should we be doing with cases that had active SNAP and recently added MFIP? We are tracking to close SNAP for 5/1/2020 and approve MFIP food and cash however this would generally mean less food therefore would be a negative action.

   **Answer**: Follow usual procedures and approve MFIP for May.

14. **Question**: If we find client has an active felony warrant can still impose a negative actions?

   **Answer**: No changes have been made to the policy about fleeing felons. Having an active felony warrant does not necessarily mean someone is a fleeing felon. Follow the guidance [CM 11.27.09 (Fleeing Felons)](#) and POLI/TEMP TE02.08.187 (Fleeing Felon).

15. **Question**: Case was transferred to Yellow Medicine County based on reported address. Receiving county is aware that this address is Project Turnabout, excluded time facility where recipient receives more than 50% of meals from the institution. Can receiving county terminate SNAP next available month due to institutional residence?

   **Answer**: No changes have been made to imposing negative actions for SNAP at this time. Close the case the next available month, allowing for proper notice.

16. **Question**: Do we continue to make changes to Uncle Harry Food Support (UHFS) as we receive updated information and decrease the benefit accordingly?

   **Answer**: No changes have been made to imposing negative actions for SNAP at this time. You can continue to decrease UHFS benefits as changes occur, allowing for proper notice.

17. **Question**: For SNAP can you work the CSES DAIL messages as we normally do and close the case if changes in anticipated child support income puts the unit over the gross income limits?
Answer: Yes, you can continue to process CSES DAIL messages following normal policies and procedures. No changes have been made to this policy.

18. **Question:** We have a mother and child open on MFIP. The child was placed into foster care and is Title IV-E eligible. If we do not close MFIP on this case, the child cannot be opened on IV-E Foster care. Can we still close MFIP for no basis of eligibility?

**Answer:** Close MFIP in this case so the child can receive Title IV-E.

19. **Question:** What if an MFIP participant had income in March that you know would have put them over for May—do you close them?

**Answer:** Refer to the revised bulletin 20-68-12C for a list of case closure reasons. Yes, you can close the case if you anticipate that their income will continue and they are over income due to counted income. However, if the client is at risk of a reduction in hours or possibly losing their job due to the current health crisis, we would recommend suspending for May, TIKL to contact the client to update their April income (verbal verification is allowed) and then determine if the case should close or be reopened.

20. **Question:** What do we do when MFIP Relative Care is open Grandma with grandchild and now the biological father is back in the home? Policy states that Grandma can no longer receive MFIP Relative Care and dad should be applying for assistance with the children on his case. Do we close the relative care case so dad can apply?

**Answer:** In this case, grandma is no longer eligible due to no children remaining in her MFIP household. Close relative care and have dad apply.

21. **Question:** Can a cash (all cash programs) be closed for date of death?

**Answer:** Refer to the revised bulletin 20-68-12C for list of case closure reasons.

22. **Question:** Can a decrease in cash benefits be issued due to date of death of a unit member?

**Answer:** Yes.

23. **Question:** If a client open on MFIP starts receiving Unemployment Insurance in April and child support that puts them over income. Would we close for May as the household is over income this month or would we be updating to close for June?

**Answer:** This depends on if the participant is prospective or retrospectively budgeted as to when the income would result in a participant being closed for over income. You may close a participant whose household’s counted income exceeds the MFIP transitional standard.

24. **Question:** Client is a Drug Felon and has a current 1st occurrence failed UA still in place for failure to consent to a UA 11/17. We have no indication or documentation that she has resolved this be passing a UA since. The client would typically have a 30% sanction and her cash portion of MFIP vendored. However, temporary guidance states to not impose sanctions due to client’s inability to comply during
the Covid-19 Public Health emergency. Does this temporary guidance apply to Drug Felons who fail a UA as well?

**Answer:** There have been no changes to the drug felon policy.

## Reviews and HRFs

1. **Question:** Do we still need to review HRFs, CSRs and recertifications 04/01/2020 that have already been submitted to determine if there is a positive change reported to the case?

   **Answer:**

   CASH: Yes.

   SNAP: MAXIS did not autoclose cases for no review for April. Review all changes reported on the forms. Since it is past 10 day notice and negative actions cannot be process for April benefits only process changes that increase benefits for April. Process changes for May as usual, allowing for proper notice. There would be no overpayments for April due to the reviews not being processed prior to 10 day cut off.

2. **Question:** For SNAP: Are we supposed to be approving all reviews for April? Example: If Cases were already closing prior to 10 day for not submitting verifications do we continue to let them close. If you do receive a review for April, please see the COVID-19 for further guidance on how to process this review.

   **Answer:** Yes, these cases will close April 1, 2020. No further action is needed at this time.

3. **Question:** For SNAP: For the Household Report Forms (HRFs) that were being tracked and were set to close the 17th when they were not submitted do we continue to leave those closed since we do not have any income verified?

   **Answer:** Any case approved to close for April 1, 2020 will still close. No further action is needed at this time.

4. **Question:** Case has an ER due for May, 2020 and the client submits a CSR with proof of income and shelter costs. How do we proceed? Are we supposed to update REVW panels at this time?

   **Answer:** Treat the CSR received like a change report form. Update the case according to the changes reported and verifications received as they are "known to the agency". Set the ER date out to November, 2020, and update the CSR date for May, 2021.

5. **Question:** If someone has a SNAP recertification do we request information without the interview? Did they receive a renewal form?

   **Answer:** Auto-close was held for any SNAP case that had a CSR or recertification for April 2020 that was not provided. HRFs, CSRs and recertifications were not sent for May, 2020. If the client provides a HRF,
CSR or recertification, treat the client as reporting any changes as a change reported during the client's certification period. See the COVID-19 Guide for more information on processing changes.

6. **Question:** I received HIRE DAILS today for an active SNAP case. I requested verifications and gave the client-10 days to respond. The client also has a SNAP recertification for May, 2020, which we are aware of, at this time is not required due to COVID-19. If HIRE DAILS are unresolved after 10 days have been given, are we able to close SNAP for May, 2020?

**Answer:** Yes, close the case allowing for proper 10-day notice. Update the STAT/REVW panel. Set the recertification date to November, 2020 and the CSR date to May, 2021 if the unit is subject to six-month reporting requirements.

7. **Question:** CS DAILS received today and the UNEA panels were updated. The client has a SNAP CSR for May, 2020, which we are aware at this time is not required due to COVID-19. Do we just leave the income that has been previously budgeted in JOBS and just update the pay dates (to clear STAT edits) and approve increase/decrease SNAP for May, 2020?

**Answer:** If the change in the Child Support income is expected to continue, approve the change (increase or decrease) for May, 2020. CASE/NOTE the information received, the conversation with the client or child support worker about anticipated child support income and what was used in the budget and why. Update the STAT/REVW panel with the next CSR date of May, 2021. Do not update what was budgeted for the earned income unless the client has reported changes that are anticipated to continue. The pay dates on the face of the STAT/JOBS panel will need to be updated to clear any STAT edits.

8. **Question:** For MFIP, are we to be waiving all HRF and other requirements and just continuing to approve? If we do have things come in, do we still require verifications? Should we be approving negative actions?

**Answer:** MFIP units who are monthly reporters are not required to complete Household Report Forms (HRFs) and verify/confirm their income each month. If a client does report a change, attempt to contact the client to get verbal verifications. Contacting clients can be completed by phone, e-mail or teleconference. If this fails, send out a request for verification using the DHS-2919 (Verification Request Form) and allow the client 10 days to return the verification. If client contacts the agency, verify as much as you can electronically or through phone calls with third parties, such as employers or landlords. When you cannot obtain documentation, use self-attestation for ANY required verification. Approve new results based on reported and verified information (follow COVID-19 verification procedures), even if it results in a reduction in benefits. If you do not receive all information needed to update the case, TIKL for six months. Do not close the case for failure to verify reported information. Follow the list of case closure reasons outlined in Bulletin 20-68-12C.

9. **Question:** With no HRF’s being sent out, we are not receiving earned income to verify if they are over income. How would we determine if they are over income when we don’t know their income?

**Answer:** Clients are not required to report income or complete HRFs. Assume currently budgeted income continues, unless the client reports a change. If a client reports that their income is now over the counted income for the program, close the case if the household’s counted income exceeds the MFIP...
transitional standard. If the client reports a reduction in income, approve an increase in cash benefits. If the client reports an increase in income, approve a reduction in cash benefits. In the situation where we have suspended cases it will be the responsibility of the worker to reach out to the client to determine if the case is once again eligible or should close after the suspension month. CASE/NOTE the action taken.

10. **Question:** We are being asked to set the recertification date out six-months. However, Health Care does not want the renewal dates changed. How do we process this in MAXIS?

**Answer:** Code "I" on STAT/REVW for Health Care. This will then not require you to update the date when updating the review date for cash programs or SNAP.

11. **Question:** Should we still impose sanctions for drug felons?

**Answer:** No changes have been made to the drug felon policies and procedures at this time.

**Students**

1. **Question:** I have an appeal on the 30th for MAXIS. Member 01 wants her daughter, Member 03 to be a part of the household although the daughter was attending college away from home. Previously when she was at college she would have been listed under multiple residences (CM 14.12) and the daughter’s main residence would have been college so Member 01 would have remained a unit of 1. Now due to COVID-19, her daughter is back at home with Member 01 and completing college courses online.

   a. Would students that don't meet the criteria from CM 11.18 (Students) remain ineligible students at this time?

   **Answer:** Yes, students who do not meet any criteria in CM 11.18 (Students) remain ineligible students.

   b. Would a student who was completing work study and is no longer able to as the school campus is closed remain an eligible student?

   **Answer:** A student who is still receiving work study payments, even if they are not able to physically perform their work would be considered to still be participating in work study and would still be an eligible student. However, if the student’s work study position has ended AND they are no longer being paid for this position then they would lose eligibility for the month following the month in which the position/payments ended.

   c. Would good cause per federal regulations apply to students who are no longer participating in work study? If so, would they then be eligible students?

   **Answer:** Students enrolled at least half time in a regular program at an institution of higher education must meet an exemption in CM 11.18 (Students) in order to be eligible for SNAP. At this time Federal SNAP policy does not allow good cause to be applied to student’s who have lost their work study jobs as a result of the COVID crisis. See answer to “b” above.
2. **Question:** If a student was an ineligible student while at school (did not meet any of the criteria found in CM11.18), but has moved home due to COVID-19 closures, are they now eligible for SNAP?

**Answer:** No, an ineligible student who is either A) continuing to participate in school through online learning, or B) intending to return to school for the summer or fall term would still be considered an ineligible student, unless they now meet one of the criteria found in [CM 11.18 (Students)](https://example.com). Eligibility workers should check CM 11.18 and confirm that the student does not now meet one of these criteria.

If the student is not continuing to participate in school AND does not intend to return to school then they are no longer considered a student. Eligibility should be determined on a non-student basis.

3. **Question:** If a student was an eligible student while at school but has moved home due to COVID-19 closures, are they still eligible for SNAP?

**Answer:** Yes, with some exceptions. A previously eligible student who is either A) continuing to participate in school through online learning or B) intending to return to school for the summer or fall term would still be considered an eligible student. However, eligibility workers should also evaluate household income eligibility first.

However, if the student had established eligibility by A) working 20 hours or more each week or B) participating in work study and they are no longer able to continue these activities they will become an ineligible student at the end of the month in which the activity ends. Ultimately, the student would still need to meet one of the criteria found in CM 11.18 and eligibility workers should review CM 11.18 for any other exemptions before determining that a formerly eligible student is no longer eligible. NOTE: Students who are continuing to receive work study payment through the end of the school term are considered to be participating in work study until those payments end.

4. **Question:** If a student is applying for SNAP and does not meet any other exemption in CM 11.18 but has decided to participate in SNAP E&T, can they now be eligible?

**Answer:** Yes, if their enrollment in SNAP E&T has been verified by an E&T provider then they would be considered to be meeting one of the criteria found in [CM 11.18 (Students)](https://example.com). This means that they would need to continue to comply with the agreed upon employment plan which their SNAP E&T provider will monitor.

Students in programs intended to last 2 years or less who apply for SNAP and do not meet other exemptions outlined in CM 11.18 should be referred to a SNAP E&T provider who can determine their eligibility for SNAP E&T. Counties should work with their local providers to identify best referral methods during this emergency. Counties are encouraged to refer participants to any E&T provider who is best equipped to receive referrals and most likely to meet the participants’ needs. A list of local E&T providers can be found on the [SNAP E&T website](https://example.com).

5. **Question:** If a student already enrolled in E&T is no longer able to participate in their school program due to campus closures and/or lack of digital learning options or capacity, what activity should E&T providers enroll the student in?
**Answer:** If the student intends to return to school in the summer or fall, E&T providers should consider this as a similar scenario to how they would handle a summer or winter break. Students should remain enrolled in their education/training component and must continue to make contact with the provider at least monthly in order to remain in compliance. This contact must be case noted at least once each month. However, they are not required to attend classes, job search, or other participate in any other activity.

Providers may allow support services for these participants, but those support services must be directly related to supporting their return to classes or maintaining any activity they are doing with the E&T provider. Providers are encouraged to maintain contact with the student and use these contacts as an opportunity to discuss long-term school and career planning.

If the student does not intend to return to school, but does wish to continue to receive support through E&T for job search, job readiness, education or training, providers should enroll them in the relevant activity.

**6. Question:** Can we continue to enroll students already receiving SNAP, in E&T?

**Answer:** Yes, for students who are enrolled in a qualifying education program and participating in online learning you can continue to enroll them in E&T following your normal process. You may also enroll students who are receiving SNAP without E&T participation on the same basis as you would enroll any other SNAP recipient. For students in qualifying programs who are not able to participate in school due to COVID-19 but who do intend to return to their classes in the summer or fall, they should be enrolled in the educational component that best reflects educational program.

**7. Question:** A student was receiving SNAP because they were working 20 hours or more each week. They have now lost their job, but are still participating in classes online and were told by eligibility that they must participate in E&T in order to be eligible. What should the E&T provider do?

**Answer:** This student can be enrolled in E&T to receive support while they complete their schooling. However the E&T provider must verify that their program of study meets the E&T requirements and provide verification of intent to enroll to the eligibility worker. If the student fails to follow their employment plan and is exited from E&T, the provider must inform the eligibility worker.

**8. Question:** We are seeing a few applications from adult students (still attending on-line), and wondering if there will be any changes/allowances made for eligible student criteria for SNAP due to COVID? In some instances, they were working 20 hours per week prior to COVID19 affecting their jobs, but have either had hours reduced or jobs have ended completely. If they don't meet one of the other eligible student criteria, are these students going to still be considered ineligible students when they’re not able to work due to COVID19 closures? Our county also does not have SNAP E&T, so we have not been able to use the option of sending them there to have their schooling approved.

**Answer:** At this time there are no planned changes to student eligibility for SNAP. Students who lose their jobs as a result of COVID-19 will become ineligible students if they do not meet any other criteria in CM 11.18 (Students). DHS is aware that this is a significant issue for these students and has passed this
Concern on to federal policy staff. Counties and tribes that do not operate or pass through funds for SNAP E&T (formerly FSET) may have providers in their area who are contracted with DHS or DEED to provide services. The SNAP E&T website includes a map listing providers by county and counties still encountering issues accessing E&T are encouraged to reach out to Anastasia Polda, SNAP E&T Supervisor at Anastasia.polda@state.mn.us.

9. **Question**: Are higher education students still subject to student requirements for SNAP at this time? Are there any waivers to allow students to be eligible for benefits who would otherwise maybe not be eligible?

**Answer**: Students in higher education are still subject to the same requirements. We are continuing to work to identify other avenues to address students in need of food access.

10. **Question**: If students were working 20 hours a week prior in college but are no longer working now due to COVID 19 and apply for Unemployment Insurance, would they now meet an exemption to be an eligible student?

**Answer**: Students who lose their jobs as a result of COVID-19 will become ineligible students if they do not meet any other criteria in CM 11.18 (Students). DHS is aware that this is a significant issue for these students and has passed this concern on to federal policy staff.

**Verifications and Client Signatures**

1. **Question**: What are the protocols for signatures and verifications given our state of emergency? The options we are considering are mailing forms for signatures, mailing and having participants send a photo of signatures, or can staff indicate on forms that it was discussed via phone?

**Answer**:
CASH: You can accept verbal signatures and verifications from clients. CASE/NOTE the verification used. SAVE is the required third-party verification system for immigration status. Please see the Immigration Status Verification section of the COVID-19 Guide for detailed instructions.
SNAP: You can accept verbal signatures but verbal verifications cannot be accepted at this time. CASE/NOTE the date, time and client’s phone number when you accept a verbal signature. Please continue to utilize mail, email and any other method of electronic communication your county agency or tribal nation has available to obtain client signatures.

2. **Question**: For people that do not have access to technology, can we extend the verification time frames?

**Answer**:
CASH: You can accept verbal verifications from a client. CASE/NOTE the verification used. SAVE is the required third-party verification system for immigration status. Please see the Immigration Status Verification section of the COVID-19 Guide for detailed instructions.
SNAP: There is no change to verification time frames at this time.
3. **Question:** If a client reports their job ended or their hours are reduced, do we still need to obtain verification from the employer or can we accept a client's statement? This can be challenging because the employer may not be available.

**Answer:**
CASH: You can accept verbal verification that employment has ended. CASE/NOTE the verification used. SNAP: Please continue to utilize all methods available at your county agency or Tribal Nation to obtain verifications that employment has ended. Use a combination of public information, documents, and applications for unemployment insurance, and other available information to verify the situation. When a client cooperates but you still cannot find an adequate source of proof, work with the client to find the best available information. Get a signed statement from the client attesting to the correctness of the information. Do not deny benefits because you cannot get proof if the client has made all reasonable efforts. Review Combined Manual [10.03 (Verification - Cooperation and Consent)](#) for more information.

4. **Question:** How are counties and tribes communicating electronically with clients to get signatures? Via email? Is that secure?

**Answer:** It is up to counties and tribes on how they are communicating electronically with clients. Whether this is via Skype, tele-conference, or e-mail. Each county and tribe is responsible for securing their email if they are using this to communicate with clients.

5. **Question:** Clients on MSA get a special diet provision and it decreases their SNAP benefits because they are getting extra cash. Clients have to recertify special diets at recertification. Can that be waived at this time?

**Answer:** This requirement cannot be waived. However, you can accept an applicant's verbal statement of the special diet for MSA if no other verification is available. At recertification, you can continue to use existing MSA special diet verification if the client is not able to provide an updated verification.

6. **Question:** We received notice from the local SSA office that they will no longer be responding to 3rd party requests for information (including our requests) due to short staffing. Does this mean if there are inconsistencies or missing information from SOLQ-I we should default to information provided by the client?

**Answer:**
CASH: You can accept a client's verbal statement as verification. CASE/NOTE the verification used. SNAP: Please continue to utilize all methods available at your county agency or tribal nation to obtain verifications. Use a combination of public information, documents, and other available information to verify the situation. When a client cooperates but you still cannot find an adequate source of proof, work with the client to find the best available information. Get a signed statement from the client attesting to the correctness of the information. Do not deny benefits because you cannot get proof if the client has made all reasonable efforts. Review Combined Manual [10.03 (Verification - Cooperation and Consent)](#) for more information.

7. **Question:** If I cannot obtain verification electronically and I am unable to call a third party on the phone with the client, can I take verbal self-attestation as verification?
Answer:
CASH: You can accept a client's verbal statement as verification. CASE/NOTE the verification used. SAVE is the required third-party verification system for immigration status. Please see the Immigration Status Verification section of the COVID-19 Guide for detailed instructions.
SNAP: SNAP cannot accept verbal statements from client as verifications. Use a combination of public information, documents, and other available information to verify the situation. When a client cooperates but you still cannot find an adequate source of proof, work with the client to find the best available information. Get a signed statement from the client attesting to the correctness of the information. Do not deny benefits because you cannot get proof if the client has made all reasonable efforts. Review the Combined Manual 10.03 (Verification - Cooperation and Consent) for more information.

8. Question: The Work Number response takes five days. Should we wait to use this or take the client's verbal statement as verification prior to getting a response?

Answer:
CASH: You should not wait for the Work Number response to approve benefits. You can accept a client's verbal statement as verification. CASE/NOTE the verification used.
SNAP: SNAP cannot accept verbal statements from client as verifications. Please use the Work Number when possible or other public information to verify employment information. When a client cooperates but you still cannot find an adequate source of proof, work with the client to find the best available information. Get a signed statement from the client attesting to the correctness of the information. Do not deny benefits because you cannot get proof if the client has made all reasonable efforts. Review Combined Manual 10.03 (Verification - Cooperation and Consent) for more information.

Note: DHS can help your agency set up an account to receive expedited responses from The Work Number. Supervisors, please contact DHS.SNAP-ME.QA@state.mn.us for assistance with this process.

9. Question: This is a general question regarding verification for MFIP and other cash programs due to the verification waiver as referenced in Bulletin 20-68-12. Under Page 2A Applying for Assistance and Interviews of the bulletin regarding phone interviews, it states that we can waive phone interviews to allow application. The reason that this will allow same day approvals. Under Page 2 C Verifications of the same bulletin it talks about using various means of getting verifications and using verbal attestation if other means of verification or not available. This seems confusing. How are we to handle verifications for applications? Are we to request verifications using the normal 10-day requirement or should we approval applications with verbal attestation so clients can get same-day approvals?

Answer: Phone interviews are not being waived. Face-to-face interviews are being waived at this time. Verify as much as you can electronically or through phone calls with third parties, such as employers. Allow signed personal statements as permitted under Combined Manual 10.03 (Verification – Cooperation and Consent) from applicants or participants. When you cannot get third party verifications electronically or through phone calls, use self-attestation for any required verification. This can be written or verbal attestation and should be documented in case notes. SAVE is the required third-party
verification system for immigration status. Please see the Immigration Status Verification section of the COVID-19 Guide for detailed instructions.

10. **Question**: Do we still require IAAs for GA and Housing Support at this time?

   **Answer**: Yes, IAAs are still required. DHS accepts electronic signatures or verbal consent to the IAA. When verbal consent is given, the worker should case note that. The Social Security Administration has confirmed that they will accept electronic signatures on the IAA, effective immediately.

11. **Question**: We have a case that is pending for 30 day residency for MFIP/DWP. Some verifications have come in but not all. Do we waive the requirement for getting in their verifications that were requested and approve on the 30th day?

   **Answer**: Verify as much as you can electronically or through phone calls with third parties, such as employers or landlords. When you cannot obtain verifications due to conditions resulting from the current public health emergency, use self-attestation for ANY required verification. Case note. If you are not able to attain the verifications (including verbal attestations), deny the case.

12. **Question**: Do I need to run a SAVE inquiry to verify immigration status?

   **Answer**: Yes, SAVE is the third-party verification that must be completed for all noncitizens, and individuals with naturalized or derived citizenship. Please see the Immigration Status Verification section of the COVID-19 Guide for detailed instructions.

13. **Question**: Are there any changes to the SNAP policies about using the Work Number to verify income?

   **Answer**: County agencies and tribal nations are to use The Work Number (TWN) to verify client income when the client is unable to obtain income verification needed or the information provided is inconsistent.

   An authorization to release is not required to use the Work Number.

   It is the client’s responsibility to provide verification of income. They have multiple options available by which to verify this (not just the Employer Verification form) and they need to be allowed the opportunity to decide which option to choose. This involves sending the client a verification request form and allowing 10 days for the client to provide the requested verification.

   It is the agency’s responsibility to assist if the client requests assistance. At this point, when the client has indicated they need assistance in obtaining verification, the agency can use the Work Number. If the client contacts you to request assistance before the end of the 10 day period mentioned above, you do not have to wait the full 10 days before sending the Work Number request. You can also let the client know (during an intake for example) that you have access to the Work Number system and can obtain verification on their behalf, but again, this is just one of their options. If receiving a verbal request by a client to use the Work Number, be sure to document in CASE/NOTEs.
14. **Question:** For GA, the client would still need to meet a basis of eligibility. Are we still requiring paper verification for this? For example, someone who states permanent or temporary illness, do we still need a MOF or Dr’s statement? Or can we take verbal attestation?

**Answer:** Clients still need to meet a basis of eligibility to be eligible for GA. For new applications, you can accept verbal attestation as verification at this time. For recertifications continue to use the existing verifications on file, even if expired. TIKL to follow up and obtain verification at the client's next recertification.

15. **Question:** The Q&A states that IAAs are still required for GA and Housing Support. It also states that SSA is accepting electronic signatures. What if client is not able to electronically sign and can only give verbal consent? Will SSA accept these IAAs? Should we track these to obtain at a later date if not able to get electronic signatures?

**Answer:** If clients are not able to sign the IAA, they can verbally consent to the IAA and the county should include this information in CASE/NOTE AND track these to obtain a written or electronic signature at a later date. Counties can sign the IAA electronically.

**Training**

1. **Question:** Are there any updates to training or new employees?

**Answer:** Please see the announcement on 03/17/2020 for further information about training.