COVID-19 2020 Guide for Cash Programs and SNAP
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Introduction
With many efforts to prevent the spread of COVID-19 and the Families First Coronavirus Response Act, many policies and procedures are being modified to increase access to essential benefits. This guide provides detailed instructions on these policies and procedures for MFIP, DWP, RCA, GA, MSA, Housing Support and SNAP.

Applications
CASH and SNAP:
Due to the increased volume of applications and many county and tribal offices being closed, applications can be processed over the phone for all programs. This change is effective March 20, 2020 ongoing for cash programs and March 1, 2020 through May 31, 2020, for SNAP. Follow the instructions below for completing phone applications.

1. When a client calls to inquire about applying for cash or SNAP, ask the client if they wish to complete an application for benefits on the spot. If yes, complete the application for the applicant. If no, complete at least the first page of the application to set the application date and do a verbal screening for expedited SNAP. Schedule a date and time to complete the application, and follow normal processing rules.

2. The date of application is the date the client gives the minimum information which is their name, address and gives a verbal signature. County and Tribal eligibility offices must have sufficient staffing and phone systems to accommodate phone applications.

3. Ask the client all questions and record the responses on a blank Combined Application Form (CAF) (DHS-5223) or DHS-5223F-ENG Supplemental Nutrition Assistance Program (SNAP) Application for Seniors (Individuals and couples age 60 and older), whichever is appropriate. If a client is already open on a cash program and wants to apply for Housing Support, a Change Report Form (DHS-2402) can be used. This application can be printed and completed by hand, or it can be completed through eDocs. Once this is completed, add this to the case file. Based on the information provided, determine if the client is eligible for expedited SNAP.

4. Read all the informational sections on the application with the client while they are on the phone. This includes the penalty warnings and qualification questions. CASE/NOTE that the applicant acknowledges and understands the information.

5. Indicate in the client signature section of the application that the client's signature was obtained via a phone call. Indicate the date, time and the client's phone number. Note: SNAP outreach staff cannot obtain a verbal signature from the client, at this time. This must be obtained by eligibility staff.

6. Read all the information on the required forms that are to be reviewed with the applicant. The forms that need to be reviewed depend on the program(s) the applicant is applying for. See the Combined Manual 05.12.12.01 (Forms/Handouts for Applicants) for the list of forms that must be reviewed.

7. For obtaining verifications, see the verification section of this guide.

8. Send the client a copy of the completed application as well as the required forms that need to be reviewed. Follow your agency's internal processes to send this information to clients. CASE/NOTE when and how forms are sent.

9. Update the applicable STAT panels in MAXIS. If the client is eligible for expedited SNAP, follow the instructions in TE02.10.01 (Expedited SNAP with Pending Verif's) to postpone all verifications except identity of the applicant.
10. Indicate clearly in the beginning of the interview CASE/NOTE that the application was accepted over the phone and a verbal signature was accepted. Below is an example of the beginning of the application CASE/NOTE for cash and SNAP applications:

**For Cash applications:**

```text
MAXIS
Case Notes (NOTE)
Please enter your note on the lines below:
Cash Application Received Via Phone Call (Enter Date)
Client called at (Enter Date and Time) from phone number (Enter Phone Number) to apply for (enter cash programs). Accepted the verbal application and completed the interview over the phone. Completed the application based on the answers the client provided over the phone and put the application in the case file.
```

**For SNAP applications:**

```text
MAXIS
Case Notes (NOTE)
Please enter your note on the lines below:
SNAP Application Received Via Phone Call on (Enter Date)
Client called on (Enter date and time) from phone number (enter phone number) to apply for SNAP. Accepted the verbal application and completed the interview over the phone. Completed the application based on the answers the client provided over the phone and put the application in the case file. Reviewed all information on the case file. The client verbally agreed to the information reviewed.
```

In addition, the remainder of the CASE/NOTE must state that the client verbally provided this information.

**Verifications**

**Cash:**

Effective March 20, 2020, verify as much as you can electronically or through phone calls with third parties, such as employers. Waive the requirement to have an applicant’s or participants' written consent to contact third parties to verify information. Allow verbal consent if written consent is not possible. Third party verifications may be provided by text, email, fax, or verbally when written forms are not possible. For verbal consent, conference calls should be used with the participant, third party, and eligibility worker when possible. Always CASE/NOTE the verbal consent from the applicant or participant.

When 3rd party verifications are not available, use self-attestation for **ANY** required verification. This can be written or verbal attestation. Code verbal verifications received with the verification code as "Other" in MAXIS and document in CASE/NOTES. The factors required to be verified include the following:

- Identity of adults
- Age
- Immigration status. See the "Immigration Status Verification" part of this guide for more information about verifying immigration status.
- Income
- Spousal support and child support payments made to persons outside the household
- Vehicles
- Checking and savings accounts
- Residence
• Social security number (Current law already waives verification for documented noncitizens and victims of domestic violence.)
• Use of non-recurring income
• The presence of a minor child in the home
• Relationship of the minor child to caregivers in the household
• Pregnancy
• School attendance
• A claim of family violence (Self-attestation is already an option allowed in current law if confirmed by a sworn statement from another person (256J.545). Waive the sworn statement from another person.)
• Disability
• Personal property
• Any information inconsistent with information already known to the county or tribe

Below is an example of a CASE/NOTE when verbal attestation was used to verify a client’s job ending:

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 CM 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 of signature from the client to obtain the verifications through phone calls to third party sources. This authorization for release of signature can be obtained verbally from the client. If it is obtained verbally, indicate in CASE/NOTEs the phone number, date and time of the signature.
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.

Immigration Status Verification

Third-party verification of Immigration status for MFIP, DWP, GA, MSA, GRH, RCA, SNAP and MFAP.
The Systematic Alien Verification for Entitlements (SAVE) system is an inter-governmental information-sharing program that verifies immigration status, or naturalized/derived citizenship for applicants of federal, state, and local public benefits.

While verbal attestation from clients may be accepted for immigration status, workers must continue to use SAVE as the third-party verification system to verify the immigration status or naturalized/derived citizenship of applicants for MFIP, DWP, SNAP, GA, MSA, GRH, RCA, and MFAP. Also use SAVE to verify a change in immigration status of clients. Please see CM 10.18.11.03 Systematic Alien Verification (SAVE).

A SAVE inquiry should not be run on anyone who is applying for benefits on behalf of another person who is not applying for benefits for themselves, Certified Victims of Trafficking and recipients of a T-visa (see CM 11.03.30 Non-Citizens Trafficking Victims), and those listed in CM 10.18.11.03 Systematic Alien Verification (SAVE).

To run a SAVE inquiry, the eligibility worker must have the applicant’s first and last name, date of birth, and an identification number from an immigration document. If SAVE verifies the applicant’s immigration status and it matches the applicant’s documentation or verbal attestation, then the eligibility worker should enter this status into MAXIS, using the proper MAXIS coding. If the SAVE report and the documentation or verbal attestation from the applicant do not match, run a second level SAVE inquiry to clear up the discrepancy.

If the SAVE Inquiry says to “Institute Additional Verification” follow the process in SAVE. The system should ask for additional information that USCIS needs to verify the applicant’s immigration status. Please go as far as possible in the SAVE process to verify a person’s immigration status. If the system asks for documentation that is not available, ask the applicant for the documentation. If the applicant is not able to send the required documentation to the worker please submit a rush PQ, including a detailed question, copies of the SAVE report(s), and all of the information or documentation that you have from the applicant.

SAVE requires that cases are not denied unless the entire SAVE process is completed and SAVE cannot verify the individual’s immigration status. Please submit a PQ before you deny a case due to an issue with documentation.

**Signatures**

**Cash and SNAP:**

Effective March 20, 2020 for cash programs and effective March 1, 2020 – May 31, 2020 for SNAP, accept verbal confirmation that the information reported by an applicant or participant is true and note that in CASE/NOTEs. A signature on the application is not required. Indicate on the signature line of the CAF the date, time and phone number of when the client provided the verbal signature.

**Combined Six-Month Reviews and Recertifications**

**Cash and SNAP:**

At this time, MAXIS has stopped the auto-close process for any case with a Combined Six-Month Review (CSR) or Recertification for April, and no recertifications or CSRs were sent for May 2020. Note: This does not include RCA cases. Follow current policies and procedures for RCA. If you have already approved a CSR or recertification for April 2020 there will be no changes to these cases. MN.IT staff at DHS are currently working on extending the
recertification and CSR dates for cases that had reviews in May. No action is needed on these cases at this time, unless you need to update the case for another reason, such as the client reporting a change. For cases that did not auto-close due to having a review due for April 2020 or if you need to make a change to a case for April or May see the guidance below.

For cases that did not auto-close due to having a recertification or CSR due for April 2020 the review dates need to be updated manually in the system. A report of these cases is being developed and will be posted on the County Action Reports section of SIR. Once this list is available review it and complete the following steps:

1. In the footer month of April, go into STAT/REVW. For cash programs update the next recertification date to October, 2020. For SNAP and Housing Support, if the client had a CSR due, update the next CSR to April 2021 and verify earned income at the next recertification. If the client had a recertification due, update the recertification date to October, 2020 and the CSR date to April 2021.
2. Send the case through background and approve ELIG results.
3. CASE/NOTE all actions taken on the case.

Cash:

For all new applications for cash programs, set the recertification date six months from the month of application. Note: This does not include RCA cases. Follow current policies and procedures for RCA.

Although recertifications are being extended, if a client chooses to provide a recertification application for April 2020 or May 2020 treat this as a client reporting information during their certification period. Follow the guidance in CM 07.15 (Unscheduled Reporting of Changes – CASH), all sections of 08 (Changes in Circumstances), and 10.18.01 (Mandatory Verifications – CASH). Complete the following steps:

- Review the information provided on the recertification.
- For any changes reported that increase or decrease benefits, attempt to contact the unit to verbally verify any needed information. If you are unable to reach the unit, request any verifications needed using the DHS-2919 (Verification Request Form) and TIKL for the 10-day return. CASE/NOTE all actions taken on the case.
  - If the client does not contact you or provide any mandatory verifications within the 10-day request period, TIKL to follow-up at the client’s next recertification. CASE/NOTE that the information was reported and not verified by the client.
  - If the client provides the mandatory verifications within the 10-day request period, update the case for the recertification month. If the client returns the verifications outside of the 10 day request period, process the change for the next available month.
- When updating the case, complete the following steps:
  1. Review STAT/PNLP and update all necessary panels with the information reported AND verified by the client. For verbal verifications received, use the verification code of "Other” on the STAT panels and CASE/NOTE that the information was received verbally.
  2. For updates to cases for April 2020 update STAT/REVW with "U” and set the next recertification date out six-months from the current recertification month. For updates to cases for May, update STAT/REVW with the next recertification date six-months from the current recertification month. For Housing Support, if a CSR was due for April or May, set the next CSR one year from the current month. If a recertification was due for April or May, set the next
recertification date out six months from the current month and update the CSR date to one year from the current month and verify earned income at the next recertification. This needs to be done in order to prevent a "Failed to File" result in ELIG (for April) and a “NEXT REVW DATE” edit (for May). If there is a Health Care review enter the code of "I" on the Status field. This will prevent needing to update the review date.

3. Send the case through background and approve new results.
4. CASE/NOTE all actions taken on the case.

- For any changes that will make the unit ineligible for benefits, review the closure reasons found under the “Reporting Requirements and Processing Changes” section. If the reason for closure is not listed, do not enter the reported information into STAT. Leave the case open. Set a TIKL to follow-up at the next recertification and CASE/NOTE all actions taken.

If you do not receive a recertification but the client reports a change, follow the instructions under “Reporting Requirements and Processing Changes” below. When updating cases for April 2020 or May 2020, even though a review was not received, the STAT/REVW panel will need to be updated in order to prevent a "Failed to File" result in ELIG (for April) and a “NEXT REVW DATE” edit (for May). Put the date the client reported the change on the "Received" field.

**SNAP:**

Follow the current recertification timelines found in CM 09.03 (Length of Recertification Periods).

Although CSRs and recertifications are being extended, if a client chooses to provide a CSR or recertification application for April 2020 or May 2020 treat this as a client reporting information during their certification period. Follow the guidance in CM 07.15.03 (Unscheduled Reporting of Changes – SNAP), all sections of 08 (Changes in Circumstances), 10.18.02 (Mandatory Verifications – SNAP) and 10.18.02.03 (Non-Mandatory Verifications – SNAP) to process the change. Complete the following steps:

1. Review the information provided on the CSR or recertification application.
2. Request any verifications needed using the DHS-2919 (Verification Request Form).
3. TIKL for the 10-day return and CASE/NOTE all actions taken on the case.
4. If the client does not provide any mandatory verifications within the 10-day request period, close the case for the next available month, allowing for 10-day notice. See CM 0026.12.03 (10 Day Notice).
5. If the client provides the mandatory verifications within the 10-day request period and:
   a. The change increases the SNAP benefits, update the case the month following the month of the reported change.
   b. The change decreases benefits, update the case the next available month allowing for 10-day notice.
   c. For updates to cases for April 2020 update STAT/REVW with "U" and set the next recertification date out six-months from the current recertification month. For updates to cases for May, update STAT/REVW with the next recertification date six-months from the current recertification month. If a CSR was due for April or May, set the next CSR one year from the current month. If a recertification was due for April or May, set the next recertification date out six months from the current month and update the CSR date (if a six-month reporter) to one year from the current month. This needs to be done in order to prevent a "Failed to File" result
in ELIG (for April) and a “NEXT REVW DATE” edit (for May). If there is a Health Care review enter the code of "I" on the Status field. This will prevent needing to update the review date.

6. If the client provides the mandatory verifications outside of the 10-day request period and the change increases SNAP benefits, budget the change the month following the month the verification was provided. **Note:** This would only occur if the verification is provided with enough time to prevent a case closure or with enough time to reinstate the case. See CM 05.09.06 (When not to Require Completion of an Application).

7. For non-mandatory verification changes, following the guidance in the CM 10.18.03 (Non-Mandatory Verifications – SNAP).

8. **CASE/NOTE** all actions taken on the case.

If you do not receive a recertification or CSR but the client reports a change, follow the instructions under “Reporting Requirements and Processing Changes” below. When updating cases for April 2020 or May 2020, even though a review was not received, the STAT/REVW panel will need to be updated in order to prevent a "Failed to File" result in ELIG (for April) and a “NEXT REVW DATE” edit (for May). Put the date the client reported the change on the "Received" field.

### Household Report Forms (HRFS)

#### Cash:

MFIP, GA, MSA, RCA units who are monthly reporters are not required to complete Household Report Forms (HRFs) nor verify/confirm their income each month. The auto-closures for HRFs were stopped effective the benefit month of April 2020 and no further action is needed on these cases at this time. No HRFs were sent for May 2020. During this time period, clients do not need to report changes for six-months. See the “Reporting Requirement and Processing Changes” section below for further information.

Although HRFs are being stopped, if a client chooses to provide a HRF for April 2020 or May 2020 treat this as a client reporting information during their certification period. Follow the guidance in CM 07.15 (Unscheduled Reporting of Changes – CASH), all sections of 08 (Changes in Circumstances), and 10.18.01 (Mandatory Verifications – CASH). Complete the following steps:

- Review the information provided on the HRF.
- For any changes reported that increase or decrease benefits, attempt to contact the unit to verbally verify any needed information. If you are unable to reach the unit, request any verifications needed using the [DHS-2919 (Verification Request Form)](https://www.dhs.state.mn.us/dhsoffice/forms/dhs-2919) and TIKL for the 10-day return. **CASE/NOTE** all actions taken on the case.
  - If the client does not contact you or provide any mandatory verifications within the 10-day request period, TIKL to follow-up at the client’s next recertification. **CASE/NOTE** that the information was reported and not verified by the client.
  - If the client provides the mandatory verifications within the 10-day request period, update the case for the report month. If the client returns the verifications outside of the 10 day request period, process the change for the next available month.
- **When updating the case,** complete the following steps:
1. For updates to cases for April 2020, update STAT/MONT with "U." This needs to be done in order to prevent a "Failed to File" result in ELIG. When updating cases for May 2020, this is not needed.
2. Review STAT/PNLP and update all necessary panels with the information provided by the client. For verbal verifications received, use the verification code of "Other" on the STAT panels and CASE/NOTE that the information was received verbally.
3. Send the case through background and approve new results.
4. CASE/NOTE all actions taken on the case.

- For any changes that will make the unit ineligible for benefits, review the closure reasons found under the “Reporting Requirements and Processing Changes” section. If the reason for closure is not listed, do not enter the reported information into STAT. Leave the case open. Set a TIKL to follow-up at the next recertification and CASE/NOTE all actions taken.

If you do not receive a HRF but the client reports a change, follow the instructions under “Reporting Requirements and Processing Changes” below. When updating cases for April 2020, even though a HRF was not received, the STAT/MONT panel will need to be updated in order to not have "Failed to File" results in ELIG. Put the date the client reported the change on the "Date Received" field.

**Uncle Harry Food Support (UHFS)**

UHFS units who are monthly reporters are not required to complete Household Report Forms (HRFs) nor verify/confirm their income each month. The auto-closures for HRFs were stopped effective the benefit month of April 2020 and no further action is needed on these cases at this time.

If you receive a HRF for April 2020 or May 2020 treat this as a client reporting information during their certification period. Follow the guidance in CM 07.15.03 (Unscheduled Reporting of Changes – SNAP), all sections of 08 (Changes in Circumstances), 10.18.02 (Mandatory Verifications – SNAP) and 10.18.02.03 (Non-Mandatory Verifications – SNAP) to process the change. Complete the following steps:

1. Review the information provided on the HRF.
2. Request any verifications needed using the DHS-2919 (Verification Request Form).
3. TIKL for the 10-day return and CASE/NOTE all actions taken on the case.
4. If the client does not provide any mandatory verifications within the 10-day request period, close the case for the next available month, allowing for 10-day notice. See CM 0026.12.03 (10 Day Notice).
5. If the client provides the mandatory verifications within the 10-day request period and:
   a. The change increases the UHFS benefits, update the case the month following the month of the reported change.
   b. The change decreases benefits, update the case the next available month allowing for 10-day notice.
   a. Update STAT/MONT with "U." This needs to be done in order to prevent a "Failed to File" result in ELIG. When updating cases for May 2020 this is not needed.
6. Review STAT/PNLP and update all necessary panels with the information provided by the client.
7. Send the case through background and approve results if it increases benefits or if the benefits remain unchanged. Do not approve results that decrease benefits.
8. If the client provides the mandatory verifications outside of the 10-day request period and the change increases SNAP benefits, budget the change the month following the month the verification was
Note: This would only occur if the verification is provided with enough time to prevent a case closure or with enough time to reinstate the case. See CM 05.09.06 (When not to Require Completion of an Application).

9. For non-mandatory verification changes, following the guidance in the CM 10.18.02.03 (Non-Mandatory Verifications – SNAP).

10. CASE/NOTE all actions taken on the case.

If you do not receive a HRF but the client reports a change or you are updating the case but the benefits do not change, follow steps 2-10 above. When updating cases for April 2020, even though a HRF was not received, the STAT/MONT panel will need to be updated in order to not have "Failed to File" results in ELIG. Put the date the client reported the change on the "Date Received" field.

**Reporting Requirements and Processing Changes**

**Cash:**

Effective immediately, all reporting requirements for all cash programs are suspended. Clients do not need to report any changes for six months.

For any changes reported that increase or decrease benefits, attempt to contact the unit to verbally verify any needed information. Verify as much as you can electronically or through phone calls with the client and/or 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. This can be written or verbal attestation and should be documented in CASE/NOTES. 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.

CASE/NOTE all actions taken on the case.

- If the client does not contact you or provide any mandatory verifications within the 10-day request period, TIKL to follow-up at the client’s next recertification. CASE/NOTE that the information was reported and not verified by the client.
- If the client provides the mandatory verifications within the 10-day request period, update the case. If the client returns the verifications outside of the 10 day request period, process the change for the next available month.

For any changes that will make the household ineligible for benefits, review the closure reasons below. If the reason for closure is not listed, do not enter the reported information into STAT. Leave the case open. Set a TIKL to follow-up at the next recertification and CASE/NOTE all actions taken.

Closure of cash cases should only occur in the following situations:

**CASH:** Closure of cash cases should occur in the following 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.

As of today, DHS is working on guidance on processing changes that are not reported by the client, but known to the agency through other sources.

SNAP:

No changes have been made to client's reporting responsibilities during their certification period at this time. See CM 07.03.02 (Six-Month Reporting), and 07.15.03 (Unscheduled Reporting of Changes – SNAP). In addition, no changes have been made to the policies and procedures for processing changes and taking negative actions, even though auto-close actions were suspended for April 2020. Follow the guidance for processing changes in CM 07.15.03 (Unscheduled Reporting of Changes – SNAP), all sections of 08 (Changes in Circumstances), 10.18.02 (Mandatory Verifications – SNAP) and 10.18.02.03 (Non-Mandatory Verifications – SNAP) to process reporting changes. For any CSRs or recertifications that were received for April 2020 or May 2020 follow the guidance in the SNAP part of the "Combined Six-Month Reviews and Recertifications" of this guide.

Adding a Person to the Unit
**Cash:**
For MFIP, DWP and RCA cases, waive the requirement for an addendum to add a person to the case. Verbally obtain all information needed to add the person to the case and document this information in CASE/NOTEs. Obtain all necessary information needed to complete CSIA-CSID panels with the client if applicable.

For participants eligible for MFIP that are pregnant with no other eligible children and the due date of the baby has passed, attempt to contact the client to verbally confirm the birth of the child. Do not close the case if the client does not respond. If the client does respond, add the person following the procedures in the CM 08.06.06 (Adding a Person to the Unit – Cash).

**SNAP**
For SNAP an addendum is not required to add a person to the unit. Follow the procedures in the CM 08.06.07 (Adding a Person to the Unit – SNAP) to add the person to the unit.

**Processing Data Matches**

**Cash:**
As of today, DHS is working on guidance on processing data matches and will provide more information as it becomes available.

**SNAP:**
If you receive a data match in MAXIS follow the current procedures for processing this match. See CM 10.24.03 (IEVS Match and Frequency), 10.24.06 (Resolving IEVS Matches) and POLI/TEMP TE02.08.142 (New Hire Matches) for more information.

**Unemployment Insurance**
For applicants that have applied for Unemployment Insurance (UI) follow the guidance below:

- Do not delay approval of an application while waiting for a decision from DEED regarding the Unemployment Insurance (UI) application
- Do not require proof of UI application prior to approving benefits; if the client appears to be eligible for UI, inform the client that they must apply for UI in order to remain eligible for cash. For SNAP, the client does not need to apply for UI to be eligible, but the client should be referred; CASE/NOTE the referral to UI.
- Set a TIKL to verify in two weeks the status of the UI.
  - If 3rd party verification is available, verify the status of the UI application.
    - If UI was denied, CASE/NOTE the denial; no additional action needs to be taken, benefits will continue.
    - If the UI application is pending, set a TIKL for 2 more weeks and verify the status of the UI application.
    - If UI was approved, budget the UI and reduce or close benefits, allowing for 10-day notice of negative or adverse action.
  - If 3rd party verification is not available, send a request for verification using the DHS-2919 (Verification Request Form) to the client; allow for 10-days to return.
    - Act on information returned and approve benefits.
    - If information is not returned; close the case, allowing for 10-day notice.
• CASE/NOTE any updates to the status of UI.

Work Requirements and Sanctions

Cash:
Beginning March 1, 2020:

• Do not sanction or disqualify MFIP, DWP and RCA participants for non-compliance with work requirements. In addition, do not impose sanctions for MFIP for failure to complete the financial orientation. If a sanction was imposed for March, remove this information in MAXIS and issue supplements using MONY/CHCK when applicable.

• Do not sanction or disqualify MFIP or DWP participants for non-compliance with Child Support. If a sanction was imposed for March, remove this information in MAXIS and issue supplements using MONY/CHCK when applicable.

SNAP:
The recently enacted Families First Coronavirus Response Act, which was signed by the President March 18, 2020, orders a temporary nationwide suspension of the three-month time limit for able-bodied adults without dependents (ABAWDs). This provision is effective April 1, 2020 until the end of the month in which the public health emergency declaration ends. The number of months SNAP recipients receive benefits during this time period will not count against their “3 in 36 month” time limit. SNAP recipients should still be encouraged to connect with a SNAP E&T provider and referred to those providers, but they will receive food benefits regardless of their participation in employment and training. Information on how to update the STAT/WREG panel due to the suspension of the three-month time limit for ABAWDs can be found in the ABAWD Instruction Guide for March and April, 2020 located on the SNAP Resource Page on SIR under the ABAWD category.

At the same time, if a SNAP recipient is enrolled in a workfare program or has a current employment plan with an employment and training provider, and their work activities do not amount to enough hours to qualify or whose work activities have decreased or ended, apply good cause. Federal regulations allow good cause to be granted for any individual who is participating in work and training activities. Good cause includes circumstances beyond the individual’s control, such as, a household emergency. The federal and state declarations of emergency apply to all Minnesotans and are considered good cause reasons for SNAP recipients when their work activities have decreased or ended.

In addition, all recipients that are considered mandatory Work Registrants subject to the work requirements have good cause for voluntarily quitting a job of 30 hours or more per week or reducing their hours below 30 per week. Do not impose sanctions for any work registrant that voluntarily quits their job or reduces their hours below 30 per week. See CM 28.06.12 (Who is Exempt from Work Registration), 28.30.09 (Refusing or Terminating Employment) and DHS-2707 (Facts on Voluntarily Quitting Your Job If You Are on the Supplemental Nutrition Assistance Program (SNAP) for more information.

Converting Cases from DWP to MFIP
COVID-19 has been determined an "unlikely to benefit" provision for DWP. For any applications received March 20, 2020 or after, approve MFIP rather than DWP. To generate MFIP-eligible results when no other Unlikely to
Benefit or FSS category applies, code caregiver(s) on STAT/EMPS as “UN - Unemployable” in the “Member Meets Hard to Employ Category” field [CM08.06.24 – DWP Conversion or Referral to MFIP]. If there is a 2-parent household, code this on each person’s STAT/EMPS panel. Maintain this coding for the duration of the public health emergency.

For families currently on DWP: Waive the requirement that families have to submit a Minnesota Transition Application Form (MTAF) to apply for MFIP at the end of the four month Diversionary Work Program. By May 1, 2020, convert all families on the Diversionary Work Program (DWP) to MFIP if the family meets eligibility requirements. This will ensure that there are no families falling in between program gaps at the end of their four month eligibility.

In rare instances where current DWP participants are not eligible for MFIP, no conversion is needed. CASE/NOTE that there was no conversion to MFIP and the reason why they were not eligible.

Workers should work off their REPT/ACTV or REPT EOMC to convert a family currently on DWP to MFIP by May 1, 2020:

1. STAT/PROG
   Enter the process date as the MFIP application date on the “Cash II” fields

2. STAT/EMPS
   Code caregiver(s) as “UN - Unemployable” in the “Member Meets Hard to Employ Category” field

3. Send case through background and approve DWP and SNAP to close. If processing after 10-day cut-off, use the override code of “10 (Unit has Appl for PA Pending)” to close the SNAP case.

   Add a WCOM to both notices explaining the reason for closure.
   - DWP notice should include: Your DWP case is closed for__________ (month of closure) as part of re-assessing your household for MFIP benefits. You already received DWP benefits for ________ (current month).
   - SNAP notice should include: Your stand-alone SNAP is closing for _______ (month of closure) because you will be receiving SNAP benefits from the MFIP program.

4. Send case through background. This will ensure that MFIP results include both the cash and food portions.

5. DENY CASH results for the application month due to duplicate assistance and approve eligible MFIP results ongoing.

6. CASE/NOTE
Family Violence Waiver Referrals

Effective March 20, 2020, waive the requirement to meet with a family violence specialist for participants experiencing family violence if such a specialist cannot be reached. When clients claim family violence follow the verification guideline in CM 10.18.33 (Verifying Family Violence). Accept the client’s self-attestation however, waive the sworn statement from any other person with knowledge of the circumstances, if the meeting or contact with the family violence specialist cannot be completed. Approve the family violence waiver for families who are eligible. If the participant is developing an employment plan, include any activities that the participant identifies as needing for their safety.

MFIP Extensions

For participants reaching their 60th month: Evaluate for an extension reason. Effective March 20, 2020, since the face-to-face assessments cannot occur to determine whether the parent in this household meets an extension category, 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”. Approve new MFIP results so MAXIS will give the correct codes on the EMPS and TIME panels. Create a TIKL for six months to review their status for a continuing extension.

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.

Note: Extending households under unemployable category may impact eligibility for Housing Assistance Grant for those living in subsidized housing. Use this extension category only as a last resort.

SNAP Alternative EBT User

Clients can verbally designate someone to use their EBT benefits on their behalf. The person designated to do this will need to obtain their own EBT card to use on behalf of the client. This is NOT the same as an Authorized Representative who applies for programs on behalf of a client. If a client calls wanting to designate someone to use their EBT benefits on their behalf, review the following information with the client while on the phone:

- Determine that the client only wants to authorize the person to use their EBT benefits to purchase groceries on their behalf, not to fill out forms or receive mail.
- Inform the client that the designated person can use the client’s SNAP EBT benefits until they report to their worker that they no longer want the person to do this. In addition, the client is responsible for the use of the SNAP EBT benefits, even if someone else is purchasing food on their behalf.
- Tell the client that the person they designate will be getting their own EBT card and will need set a PIN. The card will be generated once MAXIS is updated. How the person sets their PIN depends on if the person lives in the same home as the client, or does not. These details are listed below.
- Remind the client of what can and cannot be purchased with the use of the SNAP EBT benefits. The list can be found on the FNS website: Eligible Food Items.
- Collect the following information about the newly designated EBT user:
  - Name
  - Address
  - Date of birth

Then complete the following steps. These instructions can be found in POLI/TEMP TE02.11.35 (Mailing Correspondence – Benefits & Forms) and POLI/TEMP TE16.02 (EBT – Additional Adult):

1. If the person being designated is living in the same home as the client (they do not have to be in the SNAP assistance unit, but are living in the home). Complete the following steps:
   a. Review the MAXIS case to see if the person is already listed as a household member and is assigned a reference number. If not, add the person as a household member in MAXIS.
   b. On MONY/DISB under the “Food Support” category enter the Additional Adult's reference number on the “EBT Additional Adult” line.
   c. CASE/NOTE all actions taken on the case. If the client verbally designated someone include the client’s phone number and date and time they called in the CASE/NOTE.
   d. Once the person receives their card in the mail they can set their own PIN by calling ebtEDGE at 888-997-2227, online at www.ebtEDGE.com, or with the application available for IOS and Android at www.FISGlobal.COM/EBTEDGEMOBILE.

2. If the person is not living in the same home Complete the following steps:
   a. Complete the "Food Support Alternative Representative" portion of the STAT/AREP panel:

   ![Image of Food Support Alternative Representative Panel]

   b. After completing the STAT/AREP panel MAXIS will take you to the MONY/DISB. Under the “Food Support” category enter “55” on the “EBT Additional Adult” line.
   c. CASE/NOTE all actions taken on the case including the client’s phone number and date and time they gave their verbal signature.
d. Submit a BENE Request using the TSS BENE Request form on SIR. Indicate in the request that the client has authorized someone outside of their home to use their SNAP EBT benefits on their behalf. Include the AREP’s date of birth. The BENE staff will update ebtEDGE, with the AREP’s date of birth and assign a temporary code in order for the AREP to set their own pin. Once this is done, BENE staff will contact the worker via SIR email with the additional information that the AREP will need to set their PIN. Save this temporary code!

e. Once the AREP receives the card in the mail, they will need to create a PIN. Prior to setting the PIN, the AREP will need to contact the agency to be given the temporary code (which will have been sent to the worker via SIR email – see above).

**Note:** While waiting to receive the card, an additional adult or AREP can use the client’s EBT card and PIN if they are unable to go out and buy groceries at this time due to the COVID-19 emergency. The client will need to specify that they are authorizing the person to do this on their behalf with their eligibility worker. This needs to be documented in CASE/NOTEs.

**Disqualified in another state/eDRS**

For SNAP and MFIP food, continue to conduct searches via the MAXIS/eDRS interface to determine if any assistance unit member age 18 or older is disqualified from receiving SNAP due to a fraud disqualification in another state. This search should be conducted prior to approving any application or adding a person to the unit. If the system is not working, waive this requirement to approve an application or add a person to the unit. See CM 25.24.08 (SNAP Electronic Disqualified Recipient System) for more information.

**Students**

At this time, FNS has instructed states to treat student eligibility in the same way that we would typically treat a student on a summer or winter break from school. This means that eligibility would largely remain the same unless the student had been establishing eligibility through work or work study, which has now ended. These students may lose eligibility due to their change in circumstances. Eligibility workers should check CM 11.18 (Students) for any other exemptions they may now qualify for, and should refer to SNAP E&T providers where appropriate. Be sure to review the STAT/SCHL panel and update the coding to reflect the student’s current situation. As with all eligibility, household income qualification should be considered first.

In addition, SNAP E&T providers do not need to record hourly participation for any participant as all ABAWD work requirements have been waived and all E&T participants have been granted good cause. However, student enrollment and continued engagement must be reported to the county.

**Overpayments**

All new agency error overpayments for cash program/benefits should be non-collectible until further notice. Do not submit PQs to determine if an agency error cash overpayment should be collectible per CM 0025.12.03 and TEMP TE02.09.48. These types of overpayments should be processed as non-collectible overpayments. This does not apply to overpayments of the MFIP food portion or SNAP. These are still processed as collectible overpayments.

Continue to process the corrections and refunds to agency error overpayments to cash programs beginning in August 2016 per instructions posted to SIR on March 13, 2020.
We are currently working on more guidance regarding collections procedures at this time and will issue more information as it becomes available.