

MEPD and TW Bulletin 24-04

Date: April 17, 2024

To: Eligibility Services Supervisors and Staff

Program Managers Regional Directors Regional Attorneys Hearings Officers

From: Access and Eligibility Services Program Policy

State Office 2106

Subject: 1. End of SNAP Shelter Cost Flexibility: Change of Address

2. End of SNAP Shelter Cost Flexibility: Returned Mail

3. COVID-19 Update: Interview Requirements

The information in this bulletin will be included in a future handbook revision. Until the handbook is updated, staff must use the information in this bulletin. If you have any questions regarding the policy information in this bulletin, follow regional procedures.

Active bulletins are posted on the following websites:

- <u>Medicaid for the Elderly and People with Disabilities Handbook (MEPDH)</u> at https://hhs.texas.gov/laws-regulations/handbooks/mepd/policy-bulletins;
- <u>Texas Works Handbook (TWH)</u> at https://hhs.texas.gov/laws-regulations/handbooks/texas-works-handbook/texas-works-bulletins.

1. End of SNAP Shelter Cost Flexibility: Change of Address

Background

HHSC received federal approval to implement a **temporary process** while maintaining Medicaid coverage due to the COVID-19 Public Health Emergency (PHE) and for the duration of the state's unwinding period. HHSC accepted a change of address without requesting additional verification from the household when HHSC received the information from the household's managed care organization (MCO) or the United States Postal Service's National Change of Address (NCOA) database.

On Jan. 11, 2023, HHSC received additional federal approval to adjust procedures when shelter expense information is not included with reported address changes. The federal approval for this temporary SNAP flexibility ends on April 30, 2024.

Current COVID-19 Policy

SNAP

When a report of change of address is received from an MCO, or a change of address has been identified through the NCOA database, update the mailing and physical in-state address without requiring additional verification from the household.

When a report of change of an out-of-state physical address is received from an MCO or NCOA database, follow current policy and procedures to verify residence.

The requirement for SNAP households to return shelter expense information when a verified change of address is received by HHSC is waived. Staff must send a notice to SNAP households requesting updated shelter expenses when an address change is reported.

- If the household responds, update the shelter expense information.
- If the household does not respond, make no changes to shelter expenses until the next redetermination.

Form H0603, Shelter Cost Notice, was created to notifies recipients that they can provide shelter expenses updates for SNAP households. HHSC must send this notice to households who provide an updated address but do not provide updated shelter expenses. HHSC will retire this form when the temporary process ends.

New Policy

SNAP

If the household reports a change in its mailing, physical, or issuance address, update the household's address. When a report of change of address comes from the MCO or NCOA database, update the mailing and physical in-state address without requesting additional verification from the household.

If a physical change of address is reported, update any related changes in shelter costs and send the household a <u>Form H0025</u>, HHSC Application for Voter Registration.

When an out-of-state physical address is reported by the MCO or NCOA database, make a cold-call attempt to the household. If the household confirms the out-of-state physical address, update the household address, document the electronic case record, determine whether the move is temporary or permanent, and follow policy in Texas Works Handbook (TWH) <u>A-700</u>, <u>Residence</u>, to determine the appropriate case action.

If the household does not provide updated shelter costs when a change of address is reported, make one attempt to contact the household by phone to confirm the shelter costs. If successful, update the case record to reflect the updated shelter costs, and document the contact in the case record. If unsuccessful, make no updates to the related shelter costs and document the case record.

SR 1 and SR 2 Households

If unable to contact an SR 1 or SR 2 household by phone, verify the household's shelter costs at the next redetermination. If the household disputes the out-of-state physical address from the MCO or NCOA database, update the mailing and physical address to the address reported by the client, document the case record, and verify residency at the household's next redetermination.

Non-SR Households (SR 3)

If unable to contact an SR 3 household by phone, send <u>Form H1020</u>, Request for Information or Action, to the new address to request verification of shelter costs. If the SR 3 household fails to provide the requested shelter costs, remove the shelter or utility deduction and take the appropriate case action.

If the SR 3 household is denied due to removing the shelter or utility deductions and provides updated shelter costs within the advance notice of adverse action

period, reopen the EDG using the original certification period and process any related changes in shelter costs.

If the household disputes the out-of-state physical address from the MCO or NCOA database, update the household's address and send Form H1020, to request verification of residence. If the SR 3 household fails to provide residency verification, deny the household for failure to provide.

Note: Staff are still required to follow normal policy and procedures and address shelter expenses at application and redetermination.

Automation

Changes to TIERS were implemented with TIERS Release 117.0 on April 6, 2024.

Correspondence

Form H0603, Shelter Expense Notice, will be retired on May 1, 2024.

Handbook

Updates to the MEPDH are not required.

The TWH is scheduled to be updated in the July 2024 revision.

Training

Training is not required.

Effective Date

This policy is effective for all case actions disposed on or after May 1, 2024.

2. End of SNAP Shelter Cost Flexibility: Returned Mail

Background

HHSC received federal approval to implement a temporary process while maintaining Medicaid coverage due to the COVID-19 PHE and for the duration of the state's unwinding period. The process allowed HHSC to accept in-state returned mail address updates without requesting additional verification from the household.

On Jan. 11, 2023, HHSC received additional federal approval to adjust procedures when shelter expense information is not included with reported address changes. This temporary SNAP flexibility ends on April 30, 2024.

Current COVID-19 Policy

SNAP

If the returned mail indicates a new or forwarding in-state address, staff update the mailing and physical address and follow the new COVID-19 Policy and Procedures for "Cases with Active SNAP" in MEPD and TW Bulletin 23-08, COVID-19 Update: Returned Mail, released March 31, 2023.

Note: If the returned mail indicates a forwarding out-of-state address, staff must follow current policy and procedures in <u>TWH A-700</u>, Residence, to verify residence.

New Policy

<u>SNAP</u>

When HHSC receives returned mail determine if:

- The address on the returned mail matches the address in the case record. If the address on the returned mail has an error or is missing information, such as an apartment or unit number, update the address and resend the correspondence to the household;
- The household reported an in-state address change. If the household reported an in-state address change, update the address, any related shelter costs, resend the returned correspondence, and document the returned mail and actions taken in the case record; or
- The household reported or verified an out-of-state physical address. Deny the EDG for not meeting the residency requirement and send the household a TF0001, Notice of Case Action.

If the household has not reported an address change, make one cold-call attempt to the household to verify their address. If the household has an active SNAP EDG, verify any related changes to shelter costs.

Once updated, resend the returned correspondence. Document the contact with household, the returned mail, and actions taken in the case record.

If the returned mail is a SNAP redetermination packet and there are no other active EDGs, document this in the case record and take no further action.

If the household reports a physical change of address, send the household a <u>Form H0025</u>, HHSC Application for Voter Registration.

SR 1 and SR 2 Households

If unable to contact the household and a new or forwarding address or updated shelter costs was not provided, verify the household's physical address or shelter costs at the next redetermination.

SR 3 Households

If unable to contact the household by phone for their updated address, send Form H1020 to the address in the case record to request verification of address and any change in shelter costs.

If the returned mail indicates a new out-of-state address, send Form H1020 to request additional verification of physical address, residency, and duplicate participation.

- If the SR 3 household fails to provide the requested information on Form H1020, deny the household for failure to provide information and send Form TF0001, Notice of Case Action.
- If the SR 3 household is denied for failure to provide information and provides a correct address within the advance notice of adverse action period, reopen the EDG using the original certification period and process any related changes in shelter costs.

Automation

Automation changes are not required.

Correspondence

Correspondence updates are not required.

Handbook

Updates to the MEPDH are not required.

The TWH is scheduled to be updated in the July 2024 revision.

Training

Training is not required.

Effective Date

This policy is effective with the release of this bulletin.

3. COVID-19 Update: Interview Requirements

Background

When the Federal Public Health Emergency (PHE) ended on May 11, 2023, the Food and Nutrition Service (FNS) could no longer approve to waive SNAP interview requirements using authority under the Families First Coronavirus Response Act (P.L. 116-127). Effective June 1, 2023, FNS used authority in 7 CFR 272.3(c)(1) to approve the waiver of SNAP interview requirements. This temporary flexibility expires May 31, 2024.

Current COVID-19 Policy

SNAP and TANF

An interview is not required at initial application or redetermination. Staff must provide a verbal explanation of work rules to mandatory participants even when an interview is not required. Staff must also continue to perform collateral calls or contact the household to obtain missing information or clear discrepant information.

TP 08

Do not schedule an interview for Parent and Caretaker Relatives Medicaid.

New Policy

SNAP and TANF

An interview is required at initial application and redetermination. (<u>TWH A-130</u>, Interview Procedures, <u>TWH B-114</u>, Missed Appointment and <u>TWH B-122.3.1</u>, Denied for Missed Appointment).

Continue to follow desk review policy in TWH B-126, Processing Desk Reviews.

TP 08

Do not schedule an interview for Parent and Caretaker Relatives Medicaid.

Automation

Automation changes are not required.

Correspondence

Correspondence changes are not required.

Handbook

Handbook updates are not required.

Training

A web-based training (WBT) covering interviewing skills is available April 15, 2024 through April 26, 2024. Designated field staff will also lead huddles that include demonstrations of an interview, self-paced practice interviews, along with feedback and discussion May 1, 2024 through May 31, 2024.

Effective Date

This policy is effective for all SNAP and TANF applications and renewals processed on or after June 1, 2024.