
Interim Policy & Procedure Memorandum

ISD-IPP 15-10

TO: ISD Employees
FROM: *JMM* Marilyn Martinez, Director, Income Support Division
RE: SNAP and Medicaid Changes and Recertifications
DATE: June 12, 2015

IPP outlines the application processing policies and procedures for SNAP and Medicaid programs.

Medicaid Changes Mid-Certification:

1. When ISD receives reported changes from recipient, ISD must promptly re-determine eligibility of beneficiaries if it receives information about a change in circumstances that may affect eligibility. 42 CFR 435.916(d).
2. If ISD receives information about a change in circumstance for a MAGI eligible participant, ISD may only request from the participant additional information relating to that change. 42 CFR 435.916(d)(1)(i) and 8.100.130.11 NMAC
3. When a recipient is determined eligible for a different COE as a result of the change, the EDG must be certified for a new 12 month certification period. 42 CFR 435.916(d)(1)(ii) and Doc 475 ¶ 5.

SNAP Simplified Reporting:

4. SNAP Households assigned to simplified or interim reporting are assigned a 12 (semiannual) or 24 (annual) month certification period. This means that there are only certain reportable changes required in between reporting periods. Simplified Reporting households must complete an Interim Report in the 6th or 12th month of their certification period.
 - a. All households shall be placed on simplified reporting with the exception of the following:

- i. Household determined by the county director to have insufficient stability and warrants an alternative reporting requirement.
 - ii. A household that reports an imminent change in residence to another state.
- b. A household in which all members are elderly or disabled shall be assigned to a 24 month certification period.
- c. ISD will take action on reported changes between reporting periods and depending on their reporting requirement, ASPEN will determine the effect on eligibility according to policy.
- d. Reportable Changes in between reporting periods:
 - i. Income that exceeds 165% of the FPL for the household size;
 - ii. Moved out of state;
 - iii. Death of the Head of Household;
 - iv. Failure to comply with the SNAP Work Program Requirements;
 - v. Recipient requests closure; or
 - vi. Removal of a household member (IPP-14-06 Custody).
- e. The households are required to report and verify the following information on their IR (7 CFR 273.12(a)(1)(vi):
 - i. Unearned Income:
 - 1. Changes in the source; or
 - 2. The amount has changed by more than \$50.00 per month from the last time the household was certified or the interim report was processed, unless the information is incomplete, inaccurate, inconsistent, or outdated;
 - ii. Earned Income:
 - 1. Changes in the source
 - 2. The monthly earned amount has changed by more than \$100.00 per month from the last time the household was certified or the interim report was processed, unless the information is incomplete, inaccurate or inconsistent.
 - iii. Change in utility expenses, if the source has changed or the individual has moved (client statement is acceptable verification);
 - iv. New Social Security Number (client statement is acceptable verification).
 - v. Previously unreported medical expenses;
 - vi. Total recurring medical expenses which have changed by more than \$25.00 per month;
 - vii. Other information which has changed or is questionable; or

- viii. Unchanged information must not be re-verified unless it is incomplete, inconsistent, inaccurate or outdated.
5. Timeframe for Processing: The Interim Report (IR) form is mailed from ASPEN on the 15th of the month before the IR is due.
- a. The IR is due by the 10th day of the 6th/12th month of the certification period, to ensure there is not a delay in the issuance of benefits.
 - b. IR's submitted by the last day of the 6th/12th day of the month are to be processed in accordance with the simplified reporting requirements.
 - c. ISD has 10 working days to review and process the IR report form:
 - i. Completed IR forms with all necessary verification should be processed within this timeframe.
 - ii. Completed IR forms with all required verifications EXCEPT verification of an allowable deduction are to be processed within this timeframe. A HUMAD must be sent requesting the necessary verification for the deduction and upon receipt, the EDG processed as a change.
 - iii. Incomplete IR forms with missing verification shall be sent a HUMAD requesting the missing mandatory verifications.

Recertification:

6. HSD must have processes for notifying households of the following prior to the end of the household's certification period:
- Expiration dates
 - Provide application forms
 - Scheduling interviews
 - Recertifying eligible households
7. SNAP:
- a. The Recertification Packet is sent on the 12th of the month before the certification period ends and due no later than the 15th day of the last month of the certification period.
 - i. The recertification packet is due by the 15th day of the last month of the certification period ends to ensure their benefits are not interrupted;
 - ii. A household that does not submit an application by the 15th of the last month of recertification loses its right to uninterrupted benefits;

- iii. A household may submit their application by the end of the last day of the expiration month. The case will close on the last day. It stays closed until the recertification process is completed in ASPEN by complying with the HUMAD timeframe; and,
- iv. Households that submit their recertification within 30 days after the end of the certification period will be considered a recertification and be processed in accordance with the recertification verification standards. If eligible, their benefits will be prorated based on the date they submitted the verification. 8.139.120.8B NMAC.

b. Interviews:

If a recipient mails in the recertification packet, leaves the packet in the drop box, or is unwilling or unable to be seen in person, a “Cold Call” will be made prior to scheduling an interview. The caseworker will document the results of the cold call in the ASPEN case comments.

- i. Recipients who timely submit their recertification packet by the 15th day of the month the certification period ends must have their interview scheduled so the household will have at least 10 days after the interview to provide necessary verification before the expiration expires. (7 CFR 273.14(b)(3)(iii))

When a recertification packet is submitted on the 15th of the month the certification period ends, the recipient must have an interview no later than the 20th of the month to ensure they have at least 10 days after the interview to provide the necessary verifications and not have an interruption in benefits.

- ii. If a recipient misses their scheduled interview a Notice of Missed Interview (NOMI) must be sent.

The caseworker must mark the recipient as a no-show in the Recertification Scheduling Queue, ensure the NOMI is mailed out, and documents in case comments.

No further action is required unless the recipient calls to reschedule the interview.

c. Verifications:

i. The households are required to report and verify the following information at recertification (7 CFR 273.2(f)(8)):

1. Earned/Unearned Income:
 - a. Changes in the source;
 - b. The amount has changed by more than \$50.00 per month from the last time the household was certified or the interim report was processed; or
 - c. The information is incomplete, inaccurate, inconsistent;
2. Change in utility expenses, if the source has changed or the individual has moved (client statement is acceptable verification);
3. New Social Security Number (client statement is acceptable verification);
4. Previously unreported medical expenses;
5. Total recurring medical expenses which have changed by more than \$25.00 per month;
6. Other information which has changed or is questionable; and,
7. Unchanged information must not be re-verified unless it is incomplete, inconsistent, inaccurate or outdated.

ii. Pending verifications:

1. Necessary verifications must be requested using a HUMAD, providing the recipient 10 days to submit the verification; and,
2. If the recertification is pending verification of an allowable deduction, the case should be evaluated for eligibility without the deductions and then process as a change when the verification is received.

8. Medicaid:

a. Renewal:

1. ISD must renew the eligibility of Medicaid eligibility for individuals at least every 12 months, and no more frequently than once every 12 months, unless ISD receives information about a change in a recipient's circumstances that may affect eligibility;

2. ISD must attempt an administrative renewal and evaluate for eligibility in another category of eligibility before the renewal packet or termination letter is sent to the household;

Please refer to IPP 14-04 “Administrative Renewal for MAGI Categories of Eligibility” and IPP 15-06 “Non-MAGI Medicaid Manual Administrative Renewal,” for instructions on how to complete this process in ASPEN.

3. When an administrative renewal is not able to be completed because the ISD does not have sufficient information to determine eligibility without contacting the household, a pre-populated Medicaid renewal form (MAD 608, MAD 609, or ISD 122, depending on their category of eligibility) will be sent to the household on the 12th of the month before the certification period expires.

b. Processing Timeframes for Medicaid Recertification:

- i. When processing a Medicaid recertification, an interview is not required. 42 CFR 435.916(a)(3)(iv); and

When both a SNAP EDG and Medicaid EDG are due in the same month and all required verification is available to process the Medicaid, but the SNAP is incomplete, the caseworker must process the Medicaid and allow the SNAP EDG to pend for the necessary verification.

- ii. Households must submit their renewal form by the 12th of the month the certification period expires. If a participant does not respond to the prepopulated renewal form within 30 days (per 42 CDF 435.916(a)(3)) and is terminated, ISD must reconsider the eligibility of a participant who submits the renewal form within 90 days of termination, without requiring a new application. 42 CFR 435.916(a)(iii)

- c. All renewal forms and notices must be accessible to participants with limited-English and/or disabilities. 42 CFR 435.916(g)

d. Recertification Verification Standards:

- i. Prior to requesting additional verification from the household, existing client data used to determine eligibility for another assistance program administered by ISD must be used to recertify MAGI and Non-Medicaid