

COVID-19 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. CASH answers refer to MFIP, DWP, GA, MSA, RCA and Housing Support.

Please see the [COVID-19 Guide for Eligibility Workers](#) for more detailed policy and system procedures

Applications

1. **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:

CASH: Verbal signatures are not allowed as of 9/1/21.

SNAP: 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.

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

Answer:

CASH: COVID waivers were in effect March 20, 2020-August 30, 2021. As of September 1, 2021, verbal applications must still be accepted, however, verbal signatures will no longer be allowed.

SNAP: March 1, 2020.

3. **Question:** Can Office Support Staff (OSS) complete an application on the phone?

Answer:

MFIP/DWP/RCA: Office Support Staff (OSS) are able to assist applicants with setting the date of an application and filling out the entire CAF with the applicant over the phone. The client will need to actually sign the application within 30 days of applying to complete the application.

GA/MSA/Housing Support: OSS staff can assist clients with the application over the phone, but the application date will be the date the county or Tribal Nation receives the signed application.

SNAP: Office Support Staff (OSS) are able to assist applicants with setting the date of an application and filling out the entire CAF with the applicant over the phone. The OSS is allowed to take a verbal signature over the phone for application purposes only, and cannot complete the interview to determine eligibility for programs.

4. **Question:** The DHS instructions state that the client signature space on the CAF should be annotated with the Date, Time, and current phone number of the client as a way to represent that they have signed verbally. However, the eDocs version of the CAF wants an ID for the electronic signature. If we put in the client's name, date, time, and phone number as a signature, the form prompts our workers for an email address and then it wants a password for the signature ID. Once that ID has been created, it is the same ID for all CAFs, so if a worker completes a new CAF with a new client and goes to complete the electronic signature for the client on the form, it populates the previously created ID (with the previous client's

name, date, time, and phone number). Is there another way to annotate the verbal signature with the client on the CAF in these situations?

Answer:

SNAP: If you are unable to annotate the date, time and phone number from the client on the CAF, please include the worker's signature in the client signature field and the worker signature field. Indicate the date, time and phone number of the verbal signature in CASE/NOTES.

CASH: Verbal signatures are not allowed for cash programs.

5. **Question:** Are we required to make a phone application the first choice for applicants for Cash programs and SNAP, or can this option be used as a last resort?

Answer:

MFIP/DWP/RCA/SNAP: Yes, a phone application is offered first and must not be offered as a last resort. A phone application must be offered as an option along with all the other options for a client to apply.

GA/MSA/Housing Support: An application can be completed over the phone with the client, but the date of the application will be the date the county or Tribal Nation receives the signed application. A more efficient option would be to have the client apply via MNBenefits.

Emergency SNAP (E-SNAP)

1. **Question:** Will E-SNAP benefits be issued through a check or onto the client's EBT card?

Answer: It will be issued based on the case coding on MONY/DISB.

2. **Question:** Will recoupments be taken out of the E-SNAP benefits?

Answer: Recoupments will happen on regular SNAP benefits. However, when the E-SNAP benefits are issued, no money will be recouped from this supplement to pay towards a claim.

3. **Question:** If someone who is deceased had E-SNAP benefits issue, can these be cancelled or do the benefits just need to age off the EBT card?

Answer: These benefits cannot be canceled. They will eventually be expunged from the EBT card. See POLI/TEMP TE16.03 (EBT – Aging of Benefits) for more information.

4. **Question:** Do workers need to do anything with cases that received E-SNAP benefits for a particular month but they moved into a Long Term Care Facility and the case could not be closed for that month?

Answer: Evaluate the case and determine if SNAP should be closed for future months if it has not already been closed. For the E-SNAP benefits, no action is needed at this time. In these cases, they were eligible for E-SNAP benefits but if the benefits are unused they will eventually be expunged. There are no overpayments for E-SNAP benefits. See POLI/TEMP TE16.03 (EBT – Aging of Benefits) for more information.

5. **Question:** If we discover that a client is due a supplement for any months that had E-SNAP benefits issued and the client already received the E-SNAP supplement, should we still issue this supplement?

Answer: E-SNAP brings the case benefits up to the maximum for that household size. Generally the reason a supplement would still be due is when the unit size increases and that change was not acted on timely. If you discover that the household should still have a supplement after the unit received the maximum benefit, this can be issued any time. CASE/NOTE that a supplement was issued and the circumstances. If you have a specific case question, please submit this using the [Emergency SNAP Request Form](#).

6. **Question:** Can E-SNAP benefits be used to pay off a pre-existing SNAP claim if the client has requested to do so? If so, can a verbal signature be accepted on the DHS-5675 form?

Answer: Yes, please see TE16.21 (EBT Voluntary Repayment on Claims) for more information.

7. **Question:** Can clients receiving \$0 in SNAP benefits receive FDPIR at the same time or can they only receive SNAP due to receiving E-SNAP supplements?

Answer: Clients cannot receive E-SNAP and FDPIR at the same time.

Income and Budgeting

1. **Question:** For students receiving CRRSAA (Coronavirus Response and Relief Supplemental Appropriations Act, 2021) Emergency Funds and the American Rescue Plan (ARP) funds, how do these count for Cash programs and SNAP? How are they coded on the STAT/STIN panel?

Answer: This income is not counted for Cash programs or SNAP. Code this as "09" (Other Title IV Grant) on the STAT/STIN panel. This should not count the grant as income for Cash programs or SNAP.

2. **Question:** How do we treat COVID-19 premium/hazard/worker shortage pay that some employers pay to clients that are at high risk due to being exposed to the public while working?

Answer: This is counted as earned income to the client.

3. **Question:** If a client receives an incentive to get the COVID-19 vaccination does this count as income for Cash and SNAP?

Answer: No. These do not count as income for the Cash programs and SNAP.

Overpayments

1. **Question:** If there is an overpayment in the month a one-time COVID-19 Cash payment was issued, should an overpayment be cited for this payment as well as the regular cash assistance benefits?

Answer: Overpayments can be cited for the one-time COVID relief cash payment if the entire unit is found to be ineligible in the month of September, 2021 or August, 2022. Overpayments of a one-time

COVID relief cash payment is based on the benefit month, not the issuance month. Please see the COVID-19 Guide for more information on how to calculate these overpayments.

Reviews and HRFs

Renewal Dates

1. **Question:** With Health Care moving renewal dates to match the application month, how do we sync the SNAP and cash renewal dates with the health care dates?

Answer: Once health care renewal starts, keep the health care renewal dates. At recertification for Cash or SNAP, if the household was determined eligible for health care, align the next renewal dates with the health care dates.

Additional Review Forms

2. **Question:** Are we allowed to accept a Household Report Form (HRF) over the phone?

Answer:

SNAP: Verbal Household Report Forms (HRFs) are not allowed.

MFIP: Verbal Household Report Forms (HRFs) are not allowed. As of 4/1/22, verbal HUFs will no longer be allowed. A HUF can be used in place of a HRF. A Combined Six Month Report form along with the combined Six month report form supplement for cash (DHS 5576 and DHS 5576A) can be used in place of a HRF.

3. **Question:** What forms can we use in lieu of the HUF to complete a recertification? In addition, what forms can we use in lieu of a HRF?

Answer: The forms sent through MAXIS are the ideal forms to use for monthly reporting, six-month reviews and recertifications. Encourage clients with a monthly report or renewal due to use the form sent through MAXIS. However, if a client provides another form in lieu of the one sent through MAXIS, use the chart on the next page to determine if this can be accepted for the monthly report or renewal. The section on the left pertains to the action being taken (i.e., the client is applying for benefits, completing a monthly report, a six-month review or a recertification). The section on the are the forms and what actions they can be used for. If the form submitted by the participant is not the one sent through MAXIS be sure to state this in CASE/NOTES.

Action	CAF (DHS-5223)	MNbenefits	SNAP 60+ Application (DHS-5223F)	HRF (DHS-2120) <i>This form is sent through MAXIS for monthly reports.</i>	HUF (DHS-8107) <i>This form is sent through MAXIS for recertifications.</i>	Combined Six-Month Report Form (CSR) (DHS-5576) <i>This form is sent through MAXIS for six-month reviews.</i>	Combined Annual Renewal for Certain Populations (DHS-3727) <i>This form is sent through MAXIS to clients that meet the criteria to use this for a recertification.</i>	Change Report Form (DHS-2402)
Application	Yes	Yes	Yes for SNAP only	No	No	No	No	Can be used to apply for Housing Support only if already on another cash program. See CM 05.09.06.
Six month review	Yes*	Yes*	Yes for SNAP only*	No	Yes	Yes	No	No
Recertification	Yes*	Yes*	Yes for SNAP only*	No	Yes	No	Yes, if meeting the criteria.	No
Monthly Report	Yes*	Yes*	Yes for UHFS only*	Yes	Yes	Yes**	No	No

*For SNAP and Housing Support, if received in the month of closure, treat this as a new application. See Combined Manual 07.03.07 (Processing a Late Combined Six-Month Review) and 09.06.03 (Recertification Processing Standards).

*For MFIP/GA/MSA, if a complete HRF/CSR is received in the month of closure, REIN MFIP. See [CM07.03.06 \(Processing A Late HRF\)](#). For ERs, if a complete CAF and interview has been completed in the month of closure, REIN MFIP. See [CM09.06.03 \(Recertification Processing Standards\)](#). In both cases, benefits are not pro-rated. Also see [CM005.09.06 \(When Not to Require Completion of An Application\)](#).

**Also need the Combined Six Month Report - Supplement for cash programs (DHS-5576A)

Household Update Form (HUF)

- Question:** Can we accept a verbal Household Update Form (HUF) and/or signature from a client to complete the review?

Answer:

SNAP: Yes. You can help a client complete a HUF over the phone and accept their verbal signature over the phone as long as the waivers remain in place. For verifying information provided on the form, see the "Verification" section of this Q&A.

CASH: No. Effective 04/01/22, verbal HUFs will no longer be accepted.

Incomplete Reviews

- Question:** Since renewals can be accepted verbally, are workers expected to contact clients that don't return their renewals timely?

Answer:

SNAP: No, contacting clients is not required by DHS. However, follow your county or tribal procedures for processing renewals. If the client contacts you regarding their renewal, you can accept a verbal renewal form in the same way you accept verbal applications.

CASH: No, contacting clients is not required by DHS. However, follow your county or tribal procedures for processing renewals. Effective 04/01/2022 verbal HUFs can no longer be accepted.

Verifications for Reviews

- Question:** If we are processing a cash renewal and we previously used verbal verification for something (for example, relationship of child to parent) when they applied, do we need to attempt to obtain actual verification when processing the renewal?

Answer: Yes, when processing renewals, obtain actual verifications for all required verifications needed for current eligibility.

Students

- Question:** 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 eligible for work study, 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. From 01/01/21 – 06/10/23 any student approved for work study meets an exemption regardless of whether they are participating in or intend to participate in work study.

- Question:** We received DAIL messages that indicate student income is ending. Do we need to contact the unit to determine their student status and request verification of updated financial aid information? What should we do with students that are eligible students due to having \$0 EFC?

Answer: Complete the following steps upon receiving these DAIL messages:

1. Send a request for contact to the client using the DHS 2919 (Verification Request Form) asking the client about their student plans to return to their institution of higher education for the next academic school year.
2. If the client says **Yes** they will return to school these steps are followed:
 - Remove/update the date that creates the DAIL which is the STAT/STIN panel
 - Create a TIKL for the next recertification to verify the \$0 EFC information.
3. If the client states that they will **not** return to school for the next academic school year, remove all SCHL, STIN, & STEC panels for that unit member from the MAXIS system.
4. If the client does NOT respond to the request for contact, close the case for failure to provide mandatory verification of school attendance, allowing for 10-day notice. **Note:** Unless questionable, a verbal statement can be obtained from the client who is a student to meet this verification requirement. See Combined Manual [10.18.02 \(Mandatory Verifications – SNAP\)](#) for more information.

Verifications and Client Signatures

1. **Question:** Do the verbal signatures provisions for SNAP and Cash programs apply to appointing a new AREP authorized to apply or act on the client's behalf? Specifically, could a client appoint an AREP on a verbal application by having both the authorized representative and the client on the phone for the interview so that both could provide their verbal signature and consent?

Answer:

SNAP: Yes, verbal signatures can be used to appoint a new authorized representative. CASE/NOTE the date, time and phone numbers of the client and the authorized representative of when the verbal signatures were received. Be sure to review authorized representative designation at recertification time to determine if anything has changed. **Note:** This is different than appointing someone to use a client's SNAP benefits on their behalf. See the COVID-19 Guide for more information.

CASH: Verbal signatures are not allowed.

2. **Question:** When we obtain a verbal signature from a client as an authorization of release should we be saving a copy of the blank release with a note on it that the signature was given verbally, or is it sufficient if we CASE/NOTE that they gave verbal permission for us to contact the employer?

Answer:

SNAP: Follow your county or tribal procedures for how to include forms in the case file when possible. Regardless of whether or not the form is in the case file, CASE/NOTE the date, time and phone number that the verbal signature of release was provided. Also CASE/NOTE the relevant information on the release form that the client is verbally signing.

CASH: Verbal signatures are not allowed.

3. **Question:** With verbal signatures of release being allowed for SNAP but not Cash, what should we do when a client applies for Cash and SNAP and verbally signs a release for the SNAP program? Do we need to wait to get the physical signature before using the release for Cash? Or can we use the release for SNAP and use the information that is received for Cash as well?

Answer: No, do not wait for the signature for cash if you have a verbal release for SNAP. Yes, once you've obtained the information needed for SNAP that same information can be used to process cash as it is considered known to the agency.

4. **Question:** Can we use a verbal signature for an IEVS Difference Notice authorization form?

Answer:

SNAP: Yes, a verbal signature can be accepted for this form. CASE/NOTE the date, time and phone number used to obtain the verbal signature on the form. Please see all the applicable sections in Combined Manual 10 for more information on processing IEVS matches.

CASH: Verbal signatures are not allowed for cash programs.