



DEPARTMENT OF PUBLIC HEALTH AND HUMAN SERVICES

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Brian Schweitzer
GOVERNOR

Anna Whiting Sorrell
DIRECTOR

STATE OF MONTANA

PHONE: (406) 444-1788
FAX: (406) 444-2547

HUMAN AND COMMUNITY SERVICES DIVISION
PO BOX 202925
HELENA, MT 59620-2925

October 26, 2011

To: All Supplemental Nutrition Assistance Program (SNAP) Manual Holders

From: Tammy Poppe, SNAP Policy Specialist
Public Assistance Bureau, Central Office

Subject: SNAP Bulletin 87

Please place this bulletin at the beginning of sections SNAP 104-1 and 1508-2.

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SECTION: Application Processing and Case Management

SUBJECT: Program Compliance Changes

REFERENCES: Quality Control Provisions of Title IV of Public Law 107-171

EFFECTIVE DATE: October 1, 2011

INTRODUCTION: Beginning with Program Compliance case reviews for federal fiscal year 2012 (October 1, 2011-September 30, 2012) under Quality Control Provisions of Title IV of Public Law 107-171 ineligibility periods for refusal to cooperate with a federal and state quality control (Program Compliance) reviews are changing. The ineligibility period for refusing to cooperate with a state Program Compliance review is changing from 95 to 125 days after the end of the annual PC review period. The ineligibility period for refusing to cooperate with a federal Quality Control review changed from seven to nine months.

The timeframe for Program Compliance to transmit the case to the Food and Nutrition Service (FNS) is changing from 95 to 115 calendar days after the month the case was selected for review.

POLICY CHANGE: **SNAP 104-1 Page 8 under PROGRAM COMPLIANCE/NON-COMPLIANCE State Quality Control (Program Compliance)** make the following changes:

State Quality Control (Program Compliance): When a household's SNAP case is closed for refusal to cooperate with a PC review and the household reapplies for SNAP benefits ~~95~~**125** days after the end of the annual PC review period, the application is processed as a new application

because the disqualification ended. The household is no longer required to cooperate with the PC review.

The annual PC review period is October 1st through September 30th and ~~95~~ 125 days after the end of the period is ~~January 3rd~~ February 2nd.

Example: On June 8th the household refuses to comply with a PC review for SNAP. The case is closed effective June 30th.

On August 1st the household reapplies for SNAP benefits but still refuses to cooperate with the PC review. The application is denied.

~~On January 4th~~ The household reapplies after February 2nd for SNAP benefits and still refuses to cooperate with the PC review. The household does not have to cooperate with the PC review because the household reapplied ~~95-125~~ 125 days from the end of the annual PC review period. The household must provide all required verifications to meet eligibility requirements for the ~~January 4th~~ application after February 2nd.

SNAP 104-1 Pages 8-9 under PROGRAM COMPLIANCE/NON-COMPLIANCE Federal Quality Control (FQC) make the following changes:

When a household's SNAP case is closed for refusal to cooperate with the FQC review, and the household reapplies for SNAP benefits ~~seven-nine~~ months after the end of the annual QC review period, the application is processed as a new application because the disqualification ended. The household is no longer required to cooperate with the FQC review.

The annual QC review period is October 1st through September 30th and ~~seven-nine~~ months after the end of period is ~~April 1st~~ June 30th.

Example: On June 8, 2011 the household refuses to comply with FQC review. The case is closed effective June 30th.

On August 1st the household reapplies for SNAP benefits but still refuses to cooperate with the FQC review. The application is denied.

~~On April 1st~~ July 1, 2012 the household reapplies for SNAP benefits and still refuses to cooperate with the FQC review. The household does not have to cooperate with the FQC review because the household reapplied ~~seven-nine~~ months from the end of the annual QC review period. The household must provide all required verifications to process the ~~April 1st~~ July 1, 2012 application.

SNAP 1508-2 Page 1 under FAILURE/REFUSAL TO COOPERATE make the following changes:

When an individual does not cooperate with a Program Compliance review, the Program Compliance Auditor (PCA) sends a disqualification letter to the County Director stating the household has not cooperated with the review. The OPA Case Manager must close the SNAP case with timely notice of adverse action. The household is disqualified even if the case closed for a different reason prior to receiving the disqualification letter. It must be documented in case notes that the individual and any household he/she is a part of is not eligible to receive SNAP benefits until he/she cooperates with the Program Compliance case review or the household reapplies for SNAP benefits ~~95~~ **125** days after the end of the annual QC review period (SNAP 104-1). The OPA Case Manager must set program and person alerts to help identify the disqualification. If a household reapplies for benefits during the disqualification period, the OPA Case Manager must verify with Program Compliance that the individual has cooperated with Program Compliance before SNAP benefits can be issued (SNAP 104-1).

SNAP 1508-2 Page 2 under PROGRAM COMPLIANCE REVIEWS make the following changes to the NOTE at the bottom of the page:

NOTE: The time frames given are guidelines. Federal regulations require PC to transmit the case to the Food and Nutrition Service (FNS) within ~~95~~ **115** calendar days after the month the case was selected for review. Case files are forwarded to the next step in this process as soon as possible. Some of the steps may take longer than indicated.

Contact your Regional Policy Specialist if you have questions or concerns about this policy.