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**Date:** October 3, 2017 **Texas Works Bulletin 17-15**  
**MEPD Bulletin 17-10**

**To:** Eligibility Services – Regional Directors  
Program Managers  
Eligibility Services Supervisors  
Regional Attorneys  
Hearings Officers

**From:** Regina Carter, Director  
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State Office 2115

**Subject:** 1. **Counting Social Security Benefits for Modified Adjusted Gross Income Programs**  
2. **Social Security Number Validation**  
3. **Determining Good Cause for SNAP Employment and Training Noncompliance**

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Bulletins are sent to supervisors and other regional managers. Supervisors must share this information with all eligibility staff. Please ensure that copies are provided to staff that do not have access to e-mail. If you have any questions regarding the policy information in this bulletin, follow regional procedures. Active bulletins are posted on the following websites:

- Texas Works Handbook (TWH) at <https://hhs.texas.gov/laws-regulations/handbooks/texas-works-handbook>
- Medicaid for the Elderly and People with Disabilities (MEPD) Handbook at <https://hhs.texas.gov/laws-regulations/handbooks/medicaid-elderly-people-disabilities-handbook>

## **1. Counting Social Security Benefits for Modified Adjusted Gross Income Programs**

### **Background**

The Centers for Medicare and Medicaid Services (CMS) released guidance on how states must count Social Security Benefits (SSBs) when determining if an individual who meets a Modified Adjusted Gross Income (MAGI) program exception is expected to be required to file a federal income tax return. SSBs include Retirement, Survivors, and Disability Insurance (RSDI) and Railroad Retirement benefits.

## Current Policy

If an individual meets one of the exceptions for the taxable year in which medical assistance is requested, their MAGI individual income is excluded from the MAGI household income for certain household members (TWH Section A-1341, Income Limits and Eligibility Tests). HHSC considers 100 percent of an individual's SSBs when determining if they are expected to be required to file an income tax return.

### *Exception 1:*

An individual is a child who is:

- under age 19;
- included in the MAGI household composition of a parent; and
- not expected to be required to file a federal income tax return since the child's monthly income is below the monthly IRS income threshold listed in TWH Section C-131.5, IRS Monthly Income Thresholds.

The total income of a child who meets this exception is:

- excluded from the MAGI household income of every applicant or recipient whose MAGI household composition includes the child; and
- exempt from the child's own MAGI household income.

### *Exception 2:*

An individual is a tax dependent who is:

- included in the MAGI household composition of the taxpayer claiming them as a tax dependent; and
- not expected to be required to file a federal income tax return since the tax dependent's monthly income is below the monthly IRS income threshold listed in TWH Section C-131.5, IRS Monthly Income Thresholds.

The total income of a tax dependent who meets this exception:

- is excluded from the MAGI household income of the taxpayer who plans to claim that individual on a federal income tax return for the taxable year in which medical assistance is requested; and
- counts in the tax dependent's own MAGI household income and in the MAGI household income of everyone else in whose MAGI household composition the tax dependent is included.

## IRS Tax Filing Thresholds

A child or tax dependent is expected to be required to file a tax return if any of the following apply (TWH Section C -131.5, IRS Monthly Income Thresholds):

- total monthly unearned income is above the *unearned income tax filing threshold* of \$87.50 per month;
- total monthly earned income is above the *earned income tax filing threshold* of \$525.00 per month; or
- the combined earned and unearned income comparison is above the tax filing threshold in *Step 3: Determine if any person's income is exempt*, Line 8 of the Form H1042, MAGI Worksheet: Medicaid and CHIP.

## **New Policy and Process**

Until the Texas Integrated Eligibility Redesign System (TIERS) can be updated to calculate SSBs according to the CMS guidance, staff must submit a Policy Clearance Request (PCR) for cases in which the child or tax dependent receiving a SSB is denied **only** for excess income.

Use the following steps to determine whether to submit a PCR:

### **Step 1: Identify Impacted Individuals**

**Step 1 (a):** Is the individual applying for medical assistance one of the following?

- a child under age 19 included in the MAGI household composition of a parent; or
- a tax dependent included in the MAGI household composition of the tax payer (non-parent) claiming them as a tax dependent **and** the tax payer is also applying for medical assistance.

If no, the new policy does not apply. Follow existing policy.

If yes, go to **Step 1 (b)**

**Step 1 (b):** Does the child or tax dependent meet all three of the following criteria?

- receives SSBs at or above \$87.50 a month;
- is expected to be required to file a federal income tax return based on current policy in TWH Section A-1341; and
- is denied Medicaid and/or Children's Health Insurance Program (CHIP) **only** for excess income.

If no, the new policy does not apply. Follow existing policy.

If yes, go to **Step 2**

### **Step 2: Submit a PCR (Determining Countable SSBs)**

When a child or a tax dependent meets all the criteria in Step 1(a) and Step 1(b), staff must submit a completed PCR form following normal PCR escalation processes, ensuring that Sections I, II, and III are completed and that the case/EDG number and due date are included.

Policy staff will review the PCR to calculate the countable amount of SSBs to determine if the individual was correctly denied for excess income.

### **Step 3: Entering SSBs in TIERS**

When the policy staff return the PCR, they will include instructions the requestor must follow to complete the case in TIERS.

### Examples

**Scenario 1**

- Kyle is applying for medical assistance for his 7 year old daughter Diana. Kyle is not applying for himself.
- Kyle expects to claim Diana as a tax dependent on his federal income tax return.
- Household Composition:
  - Both Diana and Kyle's MAGI household composition consists of Kyle and Diana.
- Income:
  - Kyle earns \$2400 per month.
  - Diana receives \$400 in RSDI.
- After running EDBC, Diana is denied Medicaid and CHIP **only** for excess income.

**Step 1: Identify Impacted Individuals**

**Step 1 (a):** Is the individual applying for medical assistance one of the following?

- child under age 19 included in the MAGI household composition of a parent; or
  - tax dependent included in the MAGI household composition of the tax payer (non-parent) claiming them as a tax dependent **and** the tax payer is also applying for medical assistance.
- **Yes, go to Step 1 (b)**
- Diana is age 7 and included in the MAGI household composition of her father.

**Step 1 (b):** Does the child or tax dependent meet all three of the following criteria?

- receives SSBs benefits at or above \$87.50 a month;
  - is expected to be required to file a federal income tax return based on current policy in TWH Section A-1341; and
  - is denied Medicaid and/or CHIP **only** for excess income.
- **Yes, go to Step 2**
- Diana receives \$400.00 in RSDI a month, is expected to be required to file, and was denied Medicaid and CHIP only for excess income.

**Step 2: Submit a PCR (Determining Countable SSBs)**

Staff must submit a PCR because Diana meets all the criteria in Step 1(a) and Step 1 (b).

**Step 3: Entering SSBs in TIERS**

When the policy staff returns the PCR, it will include instructions on how to complete the case in TIERS.

**Scenario 2**

- John is applying for medical assistance for his granddaughters, Mary (age 16) and Hope (age 12). John is not applying for himself.

- John lives with his granddaughters and expects to claim them both as tax dependents on his federal income tax return.
- Household Composition:
  - John's MAGI household composition consists of John, Mary, and Hope.
  - Mary and Hope meet a tax dependent exception and their MAGI household composition consist of Mary and Hope only.
- Income:
  - Mary receives \$1,500 a month in RSDI income.
  - Hope receives \$1,500 a month in RSDI income.
  - John receives \$2,000 a month in RSDI income.
- After running EDBC, both Mary and Hope are denied for Medicaid and CHIP **only** for excess income.

### Step 1: Identify Impacted Individuals

**Step 1 (a):** Is the individual applying for medical assistance one of the following?

- child under age 19 included in the MAGI household composition of a parent; or
  - tax dependent included in the MAGI household composition of the tax payer (non-parent) claiming them as a tax dependent **and** the tax payer is also applying for medical assistance.
- **No**, the new policy does not apply and a PCR does not need to be submitted. Follow existing policy.
- Mary and Hope are tax dependents. However, their tax payer (non-parent) is not applying for Medicaid assistance.

### Scenario 3

- Mary is applying for medical assistance for her 9 year old daughter Kate. Mary is not applying for herself.
- Mary lives with Kate and does not plan to file a tax return for this tax year. Kate does not expect to be claimed on anyone's tax return.
- Household Composition:
  - Both Kate and Mary's MAGI household composition consists of Mary and Kate.
- Income:
  - Mary receives \$2400 in RSDI.
  - Kate receives \$450 in RSDI.
- After running EDBC, Kate is denied Medicaid and CHIP **only** for excess income.

### Step 1: Identify Impacted Individuals

**Step 1 (a):** Is the individual applying for medical assistance one of the following?

- child under age 19 included in the MAGI household composition of a parent; or
- tax dependent included in the MAGI household composition of the tax payer (non-parent) claiming them as a tax dependent **and** the tax payer is also applying for medical assistance.

- **Yes, go to Step 1 (b)**
  - Kate is age 9 and included in the MAGI household composition of her mother.

**Step 1 (b):** Does the child or tax dependent meet all three of the following criteria?

- receives SSBs benefits at or above \$87.50 a month;
- is expected to be required to file a federal income tax return based on current policy in TWH Section A-1341; and
- is denied Medicaid and/or CHIP **only** for excess income.

- **Yes, go to Step 2**
  - Kate receives \$450.00 in RSDI a month, is expected to be required to file, and was denied Medicaid and CHIP only for excess income.

### **Step 2: Submit a PCR (Determining Countable SSBs)**

Staff must submit a PCR because Kate meets all the criteria in Step 1(a) and Step 1 (b).

### **Step 3: Entering SSBs in TIERS**

When the policy staff returns the PCR, it will include instructions on how to complete the case in TIERS.

### **Effective Date**

Use the new process for all case actions processed on or after the receipt of this bulletin.

### **Training**

Training is not required.

## **2. Social Security Number Validation**

### **Background**

On September 17, 2016, the Texas Integrated Eligibility Redesign System (TIERS) was modified to reduce the number of duplicate client identification numbers issued by enhancing the Social Security Number (SSN) data integrity and timely updating the status of SSN validation by State Online Query (SOLQ) and Electronic Data Sources (ELDS). These modifications allow staff to validate an SSN when processing a case action.

This bulletin updates policy regarding the SSN validation process.

### **Current Policy**

*All Programs*

As described in TWH Section A-440 and MEPDH Section D-6200, an applicant must provide an SSN or apply for one through the Social Security Administration (SSA) before certification, unless the applicant is:

- an undocumented alien;
- a child age six months or younger applying for SNAP;
- an individual applying for SNAP that has good cause because circumstances beyond his or her control prevent the individual from securing proof to obtain an SSN;
- an individual applying for Medicaid who is ineligible to receive an SSN;
- an individual applying for Medicaid who does not have an SSN and may only be issued an SSN for a valid non-work reason;
- an individual applying for Medicaid who has a well-established religious objection to obtaining an SSN; or
- a newborn eligible for TP 45, MA - Newborn Children.

Applicants eligible for expedited services may receive initial benefits without providing or applying for an SSN.

An individual who is unable to provide an SSN must provide proof from the SSA that he or she applied for one. For SNAP and TANF, staff must disqualify a required member of the certified group who fails to comply without good cause (TWH Section A-420).

Staff must verify all good cause reasons to providing an SSN, as explained in TWH Section A-410.

### SOLQ

#### *Texas Works and MEPD Medicaid and CHIP*

Staff use SOLQ or Wire Third Party Query (WTPY) to verify U.S. citizenship and SSN for an applicant who has an SSN. If the SOLQ response indicates that the SSN is verified, no additional verification is needed (TWH Section A-440, or [MEPD Bulletin #14-02](#)).

If the advisor is unable to verify the SSN using SOLQ or WTPY, the advisor must:

- Review the information entered into the SOLQ or WTPY request with the information provided by the applicant.
  - If a typographical error is found, submit a new SOLQ or WTPY request with the correct information.
  - If no typographical errors are found, contact the applicant by phone to ensure the information provided is accurate. If the applicant provides new information, submit another SOLQ or WTPY request with the correct information. Update the Eligibility Determination Group (EDG) record with the correct information.
- If unable to contact the applicant by phone, send the applicant [Form H1020](#), Request for Information or Action, to request verification of the applicant's SSN along with any additional information needed. Allow the individual 10 days to provide proof.
- If the individual fails to cooperate in clearing the discrepancy with the SSA, advisors must follow procedures explained in TWH Section [A-420](#), Failure to Comply, or [MEPD Bulletin #14-02](#).

If the WTPY system is unresponsive or unavailable due to system failure, advisors must not deny or delay certification of Medicaid or CHIP coverage for failure to verify SSN or citizenship (TWH Section A-351.2 and [MEPD Bulletin #14-02](#)).

### Monthly SSN Verification Interface Process

#### *All Programs*

The monthly SSA interface in TIERS validates SSNs after certification. Validation of an SSN is identified in the **Data Collection/Individual Summary** page when the SSA box is checked for the individual.

The monthly SSA interface with the SSA attempts to validate the SSN using the same information entered into TIERS. If the number is not validated during the interface, or a duplicate SSN is found, TIERS generates:

- Alert 268, Social Security Administration Unable to Verify SSN (RG-83), when the information does not match.
  - This triggers the Task List Manager (TLM) task *Alert 268: Agency Generated Change - Social Security Administration Unable to Verify SSN (RG-83) for Client (Individual ID) XXXXXXXXXX* and routes it to the Customer Care Center (CCC) for case action.
- Alert 269, Duplicate SSN for Individual Number, when the SSN is a duplicate.
  - This triggers the TLM task *Alert 269: Agency Generated Change - Social Security Administration Reports a Duplicate SSN XXXXXXXXXX* and routes it to the CCC for case action.

### Second Level Review

#### *All Programs*

When the SSN of a certified individual remains un-validated at redetermination, TIERS requires that a Second Level Review (SLR) be performed. Staff are not able to dispose the EDG until the SLR is complete.

### **New Policy**

#### *All Programs*

Staff now have the ability to verify an individual's SSN at application, during a change, and recertification. Prior to certifying the individual, staff must now:

- validate the SSN through SOLQ;
- verify that the individual has applied for an SSN through the SSA; or
- disqualify/deny the individual for non-compliance with the SSN requirement.

**Note:** An applicant is not required to provide an SSN or apply for one if they meet any of the exceptions listed in TWH Section A-410 or MEPD Bulletin #14-02.

#### *All Programs*



SSN Validation through SOLQ

SOLQ is automatically invoked when running ELDS during certification and attempts to validate an SSN. If ELDS is not invoked due to a systems error, staff can manually invoke SOLQ from **Data Collection**.

If the SSN matches all of the demographic information provided by the individual, SOLQ will show the SSN as verified by SSA. If the information does not match, TIERS will display information in the SOLQ screens as to why the SSN is not validated.

SSN Validated

When an individual's SSN has been validated, **Data Collection** in TIERS displays:

- a checkmark in the box by the individual's SSN on the **Individual Household Summary** page; and
- a checkmark in the **Validated by SSA** checkbox on either the **Add New Individual** page, the **Modify Non File Cleared Individual** page, or the **Edit Existing Individual ID Information** page.
- In the **SOLQ Screen** "yes" is marked under the **Verified SSN** field and one of the following values is displayed in the **SOLQ Individual Information -Summary** page in the **SOLQ Summary** section under the **SSN Verification Code** field:
  - **F**: SSN is verified, but last name does not match SSN (indication that individual has changed last name due to marriage, divorce, or adoption);
  - **M, P, R, V**: SSN is verified; and
  - **X**: Data exists that the validated SSN belongs to an individual who is deceased.

In order for the SSN Validation box to be checked, staff must accept the ELDS data that shows the SSN verified. If the user has manually requested SOLQ, then the SSN Validation box will be checked when the user enters the SOLQ inquiry page through the use of the **SQ** icon.

If the SSN does validate when running ELDS or invoking SOLQ manually, staff must complete all of the pages in the **Individual Household** logical unit of work (LUW) in order for TIERS to retain the checkmark in the validation checkbox indicating that the SSN is validated.

**Note:** The specific **SSN Verification Code** is displayed in text format only when viewing SOLQ through Interfaces via the TIERS Left Navigation bar. The SSN Validation checkbox will not be populated when viewing SOLQ through Interfaces via the TIERS Left Navigation bar.

*Validated SSN with Discrepant Information that Requires Additional Action*

Although SSA has validated the SSN, the information provided by SSA does not match information provided by the individual. For code **F** and **X**, staff must clear the discrepancy prior to disposing the case action.

The verification code **F** is an indication the individual with the validated SSN has changed their last name with the SSA due to marriage, divorce or adoption. If the request is for ongoing benefits and the verification code is **F**, staff must:

- First view case documentation or attempt to contact the household by phone to obtain the individual's new last name.
- If unable to obtain the information by phone, staff must send Form H1020, Request for Information or Action, to request the information to clear the discrepancy.
- If the household does not respond to the request, staff must follow policy in TWH Section A-420, Failure to Comply, or MEPD Handbook Section D-6210, When a Person Does Not Have an SSN, to either disqualify or deny the individual.

The verification code **X** is an indication that the validated SSN belongs to an individual who is deceased. If the request is for ongoing benefits and the verification code is **X**, for

- Texas Works programs, staff must consider household composition questionable and follow policy in TWH Section C-920, Questionable Information to clear the discrepancy.
- MEPD programs, staff must consider the information questionable and follow policy in MEPD Bulletin #14-02 to clear the discrepancy.

#### *Expedited Case Actions*

When processing expedited SNAP benefits or Medicaid for Pregnant Women, staff must certify the individual with a validated SSN with a verification code **F** or **X** if unable to clear the discrepancy by viewing case documentation or contacting the household by phone. Staff must postpone verification needed to clear the discrepancy to meet expedited processing timeframes.

#### SSN Not Validated

If the individual's SSN has not been validated, the **SOLQ Individual Information - Summary** page displays a/an:

- "No" under the **Verified SSN** field;
- Reason code under the **SSN Verification Code** field;
- Error code under the **Error Code** field; and
- Discrepancy code under the **Discrepancy Code** field.

**Individual Information**

**Name:** \_\_\_\_\_ **Individual #:** \_\_\_\_\_

**SSA/SSI Information**

**Title II Data Present:** No **Title XVI Data Present:** No

**SOLQ Information**

Address: No Demographics: No Eamed Income: No Medicare: No  
 SS: No Unearned Income: No SSCN: No [Resources:](#) Yes  
 Alien: No Payee: No Living Arrangement: No Citizenship: No

**SOLQ Summary**

SSCN	Input SSN	Verified SSN	SSN Verification Code	Error Code	Discrepancy Code	Transaction Date
No			5	120	E	06/08/2017

- **SSN Verification Codes:**
  - 1: SSN not found;
  - 3: Surname matched, but DOB did not match;
  - 5: Surname or given name does not match (e.g., SSN submitted for John Smith belongs to Pam Jones) - DOB was not checked.
  
- **Error Codes:**
  - 102: SSN invalid or missing;
  - 103: Both SSN and Claim Account Number (CAN) invalid or missing;
  - 120: SSN unverified.
  
- **Discrepancy Codes:**
  - 2: Birth date does not match exactly;
  - 4: Given name does not match exactly;
  - 6: Given name and birth date do not match exactly;
  - 8: Surname does not match exactly;
  - A: Surname and birth date do not match;
  - C: Surname and given name do not match exactly;
  - E: Surname, given name, and birth date do not match exactly.

To display the reason the SSN was not validated, staff click on the magnifying glass icon in the **SOLQ Individual Information - Summary** page and click **Next** to advance to the **SOLQ Individual Information - Error** and **SOLQ Individual Information - Discrepancy** pages.

***SOLQ Individual Information - Error page displaying SSN Verification Code Description and Error message***

Summary Detail **Error** Discrepancy

**SOLQ Individual Information - Error** ?

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Request Information

Last Name: [REDACTED] First Name: [REDACTED] Date of Birth: [REDACTED]  
SSN: [REDACTED] SSCN: [REDACTED] Gender: Female

SSN Verification Code Description

Name does not match (e.g., SSN submitted for John Smith belongs to Pam Jones); DOB was checked.

Error Message

SSN unverified

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***SOLQ Individual Information - Discrepancy page displaying Discrepancy Information***

Summary Detail Error **Discrepancy**

**SOLQ Individual Information - Discrepancy** ?

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Request Information

Last Name: [REDACTED] First Name: [REDACTED] Date of Birth: 02/08/2015  
SSN: [REDACTED] SSCN: [REDACTED]

Discrepancy Information

Surname, given name and birthdate do not match on Title II

Title II Discrepancy Information

Last Name: [REDACTED] First Name: [REDACTED] Date of Birth: [REDACTED]

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***Not validated SSN that Requires Additional Action***

If the individual's SSN is not validated during **Data Collection**, staff must review the information in the **Verified SSN**, **SSN Verification Code**, **Error Code**, and **Discrepancy Code** fields to determine why the SSN is not validated. Staff must then compare the data entered in TIERS

with the information included on the application, or supporting documents, and update any information entered incorrectly. After making any corrections, **staff must invoke SOLQ manually to re-run the validation process.**

If the information provided on the application or supporting documentation matches information entered in **Data Collection** and the SSN is not validated after making updates, staff must consider the SSN or client's demographic data provided to be questionable and must:

- First attempt to contact the household by phone to clear the discrepancy.
- If unable to clear the discrepancy by phone, staff must send Form H1020, Request for Information or Action, to request information to clear the discrepancy.
- If the household does not respond to the request, staff must follow policy in TWH Section A-420, Failure to Comply, or MEPD Bulletin #14-02, to either disqualify or deny the individual.

**Note:** The **SSN Verification Code**, **Error Code**, and **Discrepancy Code**, is displayed in text format only when viewing SOLQ through Interfaces via the TIERS Left Navigation bar.

### *Expedited Case Actions*

When processing expedited SNAP benefits or Medicaid for pregnant women, staff must certify the individual with an un-validated SSN if unable to clear the discrepancy by viewing case documentation or contacting the household by phone. Staff must postpone verification needed to clear the discrepancy to meet expedited processing timeframes.

### Case Disposition

Before certifying an individual for benefits, staff must verify the **SSN Validation** check box is checked and that any SSN discrepancy has been cleared.

### Second Level Review

If the SSN of a certified individual remains un-validated at redetermination, TIERS requires that a Second Level Review (SLR) be performed. Staff are not able to dispose the Eligibility Determination Group (EDG) until the SLR is complete. To complete the SLR, staff must follow the processes outlined under the "SSN Not Validated" section of this bulletin.

### Monthly SSN Verification Interface Process

Staff must follow the new policy and process for SSN Validation through SOLQ before certifying an individual. This will greatly reduce the number of SSNs that are validated through the monthly SSN verification interface process. The number of individuals being validated through the interface will be monitored to ensure compliance with the policy for SSN validation through SOLQ.

### **Effective Date**

The new process is effective immediately upon the distribution of the bulletin.

### **Handbook**

Texas Works Handbook updates are scheduled for April 2018.

MEPD Handbook updates are scheduled for March 2018.

## **Training**

No training is required.

### **3. Determining SNAP Good Cause for SNAP Employment and Training Noncompliance**

#### **Background**

The Food and Nutrition Service (FNS) conducted an audit on the state's Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) program and found the current process for determining good cause for noncompliance with SNAP E&T work requirements does not comply with federal regulations. Federal regulations require Texas Health and Human Services Commission (HHSC) eligibility staff to make the final determination of good cause prior to imposing a SNAP E&T sanction when a mandatory registrant fails to comply with work requirements.

#### **Current Policy**

The Texas Workforce Commission (TWC) determines when a mandatory work registrant fails to comply with SNAP E&T work requirements and determines good cause for noncompliance with SNAP E&T.

#### **Good Cause Determination and Noncompliance Report Process**

##### ***Noncompliance without Good Cause***

When a mandatory individual fails to cooperate with SNAP E&T work requirements without good cause, TWC sends a sanction request through the automated interface to HHSC. HHSC staff review the sanction request and impose the sanction, if appropriate.

##### ***Noncompliance with Good Cause***

When TWC determines that a mandatory individual fails to cooperate with SNAP E&T and grants good cause before the SNAP E&T sanction request is sent through the automated interface to HHSC, TWC does not inform HHSC of the noncompliance or the good cause reason.

When HHSC has already imposed the SNAP E&T sanction and an individual wishes to claim good cause during the adverse action period, TWC reviews the individual's good cause claim and sends a response to HHSC through the automated interface notifying HHSC of the good cause.

If a household contacts HHSC to report good cause, HHSC staff use the Form H1816, SNAP E&T Noncompliance Report, and informs the household to contact TWC for a good cause determination.

## **New Policy**

The Texas Workforce Commission (TWC) determines when a mandatory individual fails to comply with SNAP E&T work requirements and recommends good cause for noncompliance with SNAP E&T to HHSC. HHSC reviews the recommendation to make the final good cause determination.

### Good Cause Recommendation and Noncompliance Report Process

When a mandatory individual fails to comply with SNAP E&T work requirements, TWC will contact the individual to explore whether good cause existed for the date of the noncompliance before reporting the noncompliance to HHSC.

### ***Noncompliance without Good Cause***

If the mandatory individual does not claim a good cause existed, TWC will send a sanction request to HHSC through the automated interface. HHSC reviews the recommendation to make the final good cause determination.

### ***Noncompliance with Good Cause***

- If the mandatory individual claims to have good cause for the noncompliance, TWC will provide a recommendation of good cause to HHSC with the report of SNAP E&T noncompliance through the interface.
- When a mandatory individual fails to comply with SNAP E&T work requirements and claims good cause when TWC contacts them:
  - TWC sends the report of the noncompliance along with a recommendation to allow good cause to HHSC through the automated interface.
  - HHSC captures the noncompliance and good cause information in TIERS in the **Non-Cooperation - Details** page.
  - HHSC reviews the case information to determine if the sanction is applicable and if the accompanying recommendation of good cause meets one of the valid reasons listed in TWH [A-1861](#), Reasons for Good Cause.
  - HHSC informs TWC whether good cause is granted or denied through the automated interface.
- When a mandatory individual fails to comply with SNAP E&T work requirements and contacts TWC to claim good cause after TWC reports the noncompliance and the penalty has been imposed:
  - TWC sends the recommendation of good cause to HHSC.
  - HHSC reviews the recommendation of good cause to determine if the good cause meets one of the valid reasons listed in TWH [A-1861](#), Reasons for Good Cause.
  - HHSC informs TWC whether good cause is granted or denied through the automated interface.

- If the mandatory individual who failed to cooperate with SNAP E&T work requirements claims good cause after the adverse action periods ends, HHSC denies the good cause recommendation and the penalty remains.

**Note:** This policy does not impact the process to determine good cause in situations when a SNAP recipient voluntarily quits a job or reduces work hours as stated in TWH [A-1850](#), Voluntary Quit. HHSC staff will continue to determine good cause for voluntary quit and reduction of hours.

### Good Cause Recommendation with Form H1816 Process

When a mandatory individual fails to comply with SNAP E&T work requirements and claims good cause for any reason which is not captured in TIERS or in TWC's automated system, The Workforce Information System of Texas (TWIST):

- TWC will complete Form H1816 to manually report the good cause reason claimed by the individual by faxing Form1816 to HHSC via the non-expedited fax line, 1-877-447-2839.
- TWC also reports the noncooperation and the recommendation of good cause through the interface which sends the noncooperation information and selects the Good Cause reason on the **Non-Cooperation - Details** page as "Form H1816 sent to claim other good cause reason."
- The system triggers Alert 872, *SNAP Good Cause: Review the Form H1816 for a SNAP E&T* to prompt eligibility staff to review the good cause reason written within the Comments section of Form H1816 and to determine if good cause exists.
- Eligibility staff completes the **Non-cooperation - Details** page in TIERS to document, within the freeform text box displayed on the page, the good cause reason TWC provided on Form H1816.
- Eligibility staff makes the appropriate selection to either approve or deny the good cause claim. Eligibility staff must review the date the good cause was claimed. Good cause claims reported to TWC after the adverse action period are denied.
- The interface reports the outcome to TWC.

### **Automation**

Changes to TIERS are effective with implementation of Release 100.

### **Forms**

The Form H1816, SNAP E&T Noncompliance Report, is revised to align with the new policy:



Form H1816, SNAP E&T Noncompliance Report



**Effective Date**

The policy is effective for any noncompliance or good cause recommendation received on or after October 9, 2017.

**Handbook**

The Texas Works Handbook updates are scheduled for April 2018.

**Training**

Training is covered in the web-based training titled **R100-SNAP E&T Good Cause**. A training broadcast was sent September 29, 2017.