



MEPD and Texas Works Bulletin 20-05

Date: March 27, 2020

To: Eligibility Services Supervisors and Staff
Program Managers
Regional Directors
Regional Attorneys
Hearings Officers

From: Access and Eligibility Services Program Policy
State Office 2115

Subject: COVID-19 Policy Updates #2

The information in this bulletin provides temporary guidance regarding policies and procedures for processing case actions during the novel coronavirus (COVID-19) outbreak. Staff will be notified when the COVID-19 policy and clarifications should no longer be used for processing case actions and determining eligibility. 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 \(TWH\)](http://hhs.texas.gov/laws-regulations/handbooks/texas-works-handbook/texas-works-bulletins) at <http://hhs.texas.gov/laws-regulations/handbooks/texas-works-handbook/texas-works-bulletins>;
- [Medicaid for the Elderly and People with Disabilities Handbook \(MEPDH\)](https://hhs.texas.gov/laws-regulations/handbooks/mepd/policy-bulletins) at <https://hhs.texas.gov/laws-regulations/handbooks/mepd/policy-bulletins>.

COVID-19 Policy Updates #2

Background

On March 13, 2020, Governor Greg Abbott declared a state of disaster for all counties in Texas due to the novel coronavirus (COVID-19) outbreak. On the same date, President Donald J. Trump declared a national emergency. Guidance from state and federal leaders emphasize the need for social distancing and limiting contact with others during this time. In light of this guidance, HHSC is providing the following policy clarifications and temporary changes to eligibility policies to accommodate processing of case actions during this emergency period.

1. Extended Supplemental Nutrition Assistance Program (SNAP) Certification Periods

SNAP

COVID-19 Policy Information

The Food and Nutrition Service approved extending SNAP certification periods for six additional months. This policy applies to all SNAP households, including SNAP-SSI and SNAP-CAP households, with recertifications due in March, April and May 2020.

Households with certification periods ending in:

- March 2020 are automatically extended through September 2020;
- April 2020 are automatically extended through October 2020; and
- May 2020 are automatically extended through November 2020.

No action is needed to extend SNAP benefits. TIERS automation will adjust the recertification due dates for households who will receive the extension.

For existing case actions:

- continue processing any SNAP recertifications that have already been pended and/or interviewed.
- not touch any recertifications that haven't been initiated; the certification period will be automatically extended.
- not deny for missed appointment; the certification period will be automatically extended.

Automation

TIERS will automatically extend active SNAP EDGs with recertifications due in March, April and May 2020 starting the weekend of March 28, 2020.

Correspondence

Households will receive a notice informing them of the extension and their new certification period.

Handbook

Handbook updates are not required.

Training

Training is not required.

Effective Date

This policy is effective with the release of this bulletin for SNAP recertifications due in March, April and May 2020.

2. Interview Requirements

SNAP, TANF and TP 08

Current Policy

An interview is required at initial application and redetermination (TWH A-130, Interview Procedures).

COVID-19 Policy

An interview is not required at initial application or redetermination. Additionally, do not schedule an interview for SNAP, TANF and TP 08 (Parent and Caretaker Relatives Medicaid). Identity must still be verified using existing sources listed in TWH A-621, Verification Sources. Staff should use all available sources, such as Data Broker or identity verification imaged in the case file before pending the household for identity verification.

Note: Staff with access to an agency phone are expected to attempt to call the applicant to clear discrepant information and contact a collateral source, if needed. Staff without access to an agency phone are not required to make calls but must pend the household to clear any discrepancies or obtain mandatory verification.

Staff must make the following entries within TIERS to bypass the interview requirement:

When using Application Registration, in the **Maintain Application – Summary** page OR when using **Complete Action Registration**:

- for “Is an appointment required or requested to process this application?”, select **YES**
- for “Are you conducting a flexible appointment interview now?”, select **YES**
- for “Contact Type”, select **INBOUND CALL**

At the **Individual Interviewed - Summary** LUW, in the **Individual Interviewed - Details** page:

- for "Was interview conducted?", select **YES**
- for "Interview Date", TIERS defaults to the current date (update to the date of processing if necessary)
- for "Name", select the head of the household

In the **Appointment – Details** page, "Appointment Status" will indicate SHOW. Click Next.

In the **Appointment – Caller Authentication** page:

- for "Did the caller accurately respond to the authentication questions?", select **YES**
- for "Authentication Response Date", enter the date of processing
- in "Comments", enter "Interview was not held due to COVID-19 emergency."

In **TIERS Case Action Documentation Summary (CADS)**: in "Other Information for the Finisher", enter "Interview was not held due to COVID-19 emergency."

Automation

Automation changes are not required.

Correspondence

Correspondence changes are not required.

Handbook

Handbook updates are not required.

Training

Training is not required.

Effective Date

This policy is effective with the release of this bulletin. Staff will be notified when the COVID-19 policy and clarifications no longer apply.

3. Workforce Orientation for Applicants (WOA)

TANF

Current Policy

A caretaker or second parent must attend a workforce orientation prior to being certified for TANF. Provide the household with:

- Form H2588, Workforce Orientation Referral, to refer the applicant to the local Texas Workforce Commission (TWC) office; and
- Form H1020, Request for Information or Action with the requirement to provide proof of workforce orientation. (TWH A-2210, Requirements)

The application is denied if the person does not attend the WOA, unless HHSC is notified by TWC that the workforce orientation is unavailable within the pending period. (TWH A-2212.2 Workforce Orientation Flyers; TWH A-2214 Failure or Refusal to Comply with the Workforce Orientation Requirement)

COVID-19 Policy

TANF applicants are not required to complete the WOA prior to being certified for benefits. Choices services, including the WOA, are temporarily suspended. Do not include the requirement to attend the WOA on the H1020 or use the Form H2588 to refer applicants to the WOA.

Make the following entries on the **Workforce Orientation – Details** page to exempt the person from the WOA requirements:

- For “*Has individual attended workforce orientation?*”, select **No**
- For “*Good Cause Reason for Not Attending*”, select **Unable to apply/attend an interview at the local office.**
- For “*Extraordinary Circumstances*”, select **No available transportation or a disruption in transportation arrangements.**

Staff must also document in **Case Comments**: “WOA not required due to COVID-19 emergency.”

If applicants return a completed Form H2588, follow normal policy to certify the applicant.

Automation

Automation changes are not required.

Correspondence

Correspondence changes are not required

Handbook

Handbook updates are not required.

Training

Training is not required.

Effective Date

This policy is effective with the release of this bulletin. Staff will be notified when the COVID-19 policy and clarifications no longer apply.

4. Choices Participation

TANF

Current Policy

A TANF caretaker or second parent must participate in Choices employment services unless they meet an exemption listed in TWH A-1821.1, Choices Exemptions.

COVID-19 Policy

TANF recipients are not required to participate in Choices services. Choices services are temporarily suspended. Continue to enter the participation and exemption information, as applicable in TIERS. Upon certification, participant information will be sent to the Texas Workforce Commission (TWC) through the automated interface. However, TWC will not send sanctions through the automated interface for persons who cannot participate due to the COVID-19 pandemic.

Automation

Automation changes are not required.

Correspondence

Correspondence changes are not required

Handbook

Handbook updates are not required.

Training

Training is not required.

Effective Date

This policy is effective with the release of this bulletin. Staff will be notified when the COVID-19 policy and clarifications no longer apply.

5. SNAP Employment and Training (E&T) Participation

SNAP

Current Policy

Every nonexempt SNAP household member age 16 through 59 must be registered for employment services at initial certification (TWH A-1810, General Policy).

At initial certification and recertification, determine each person's registration/participation exemption status, provide Form H1808, SNAP Work Rules, for each registrant in the household, and inform the person interviewed about their rights and responsibilities, and consequences if they do not comply. (TWH A-1822, E&T Procedures)

COVID-19 Policy

SNAP recipients are not required to participate in SNAP E&T. SNAP E&T services are temporarily suspended. All SNAP recipients are considered exempt participants

during the pandemic. No action is needed to designate SNAP recipients as exempt. TIERS modifications will be made to exempt SNAP participants from SNAP E&T.

Automation

Changes to TIERS are currently scheduled to be implemented during the weekend of March 28, 2020.

Correspondence

Correspondence changes are not required.

Handbook

Handbook updates are not required.

Training

Training is not required.

Effective Date

This policy is effective with the release of this bulletin. Staff will be notified when the COVID-19 policy and clarifications no longer apply.

6. Able-Bodied Adults Without Dependents (ABAWD) Time Limits

SNAP

Current Policy

An ABAWD is a person age 18 to 49 who:

- is physically and mentally able to work at least an average of 20 hours per week;
- is not a member of a SNAP EDG where a household member on the SNAP EDG is under age 18; or
- is not pregnant.

ABAWDs are initially limited to three months of SNAP eligibility in a 36-month period if they are not working or participating in a work program an average of 20 hours per week. (TWH A-1910, General Policy)

ABAWDs who have received the three months of time-limited benefits may qualify for one additional three-month period of eligibility in the 36-month period if the person is not meeting the work requirement but has worked or participated in a work program at least 80 hours in a 30-day period after receiving the initial three months of time-limited benefits. (TWH A-1961 Second Time-Limited Three-Month SNAP Eligibility Period)

Months are counted toward the ABAWD time limit if the person:

- receives SNAP benefits in Texas or any other state that month;
- is not exempt from the work requirement that month; and
- fails to work an average of 20 hours per week that month. (TWH A-1950, Counting Months Toward Time-Limited Eligibility)

The ABAWD is not eligible to receive SNAP if they have received the maximum number of months under the federal time limits. (TWH A-1951, After the Three Months of Time-Limited SNAP Eligibility)

COVID-19 Policy

Based on federal law, HR 6201 (Families First Coronavirus Response Act), states must suspend counting months towards the ABAWD time limit during the pandemic. ABAWDs not working or participating in work activities an average of 20 hours per week are not subject to federal time limits until further notice. No action is needed to suspend counting ABAWD. TIERS modifications will be made to suspend counting the ABAWD months.

Automation

Changes to TIERS are currently scheduled to be implemented during the weekend of March 28, 2020.

Correspondence

Correspondence changes are not required.

Handbook

Handbook updates are not required.

Training

Training is not required.

Effective Date

This policy is effective with for the April 2020 benefit month. Staff will be notified when the COVID-19 policy and clarifications no longer apply.