



SNAP 103-1

APPLICATION PROCESSING

Application Filing/Interview Process

Supersedes: SNAP 103-1 (07/01/2018)

References: 7 CFR 273.2; 7 CFR 273.14

Overview:

The SNAP eligibility determination process includes filing and completing an application form, being interviewed, and verifying necessary information. A household has the right to file an application by submitting the completed forms to the Office of Public Assistance either in person, through an authorized representative, by mail, by completing an on-line electronic application, or by fax, telephone, or other electronic transmission. The household may submit the application to any Office of Public Assistance.

All households have the right to apply or to re-apply for SNAP in writing. The eligibility staff shall neither deny nor interfere with a household's right to apply or to re-apply in writing.

Only a name, address and signature are required to apply for SNAP. The date this information is received is the application date and the remainder of the application must be completed during the interview.

FILING AN APPLICATION:

When a household or authorized representative contacts the OPA and expresses interest in receiving SNAP assistance or expresses concerns which indicate food insecurity, the OPA will encourage the household or authorized representative to file an application the same day it contacts the OPA. If the household contacts the OPA by telephone they must be given the option to apply for SNAP by providing their name, address and signature on a paper application, on-line application at apply.mt.gov., or by completing an interactive interview (Statement of Facts (SOF) with an eligibility staff member who has the capability to record the client assenting to the information (i.e., signing the application). If the household wants to file a paper application but does not want to or can't come to the office that day to file an application, or there is a written request for food assistance, the OPA must mail the household an application the same day it receives the request.

A completed application cannot be required prior to scheduling an interview. When the household requests assistance with completing the application, the OPA will assist the household with completing its application.

When a joint application is received for TANF cash assistance and SNAP benefits, the household must be informed that TANF work requirements (e.g., Family Investment Agreement/Pathways Employability Plan activities) do not apply to SNAP eligibility. If the household is encouraged to conserve its time-limited TANF benefits, the eligibility staff member must inform the household TANF time limits do not apply to SNAP eligibility and encourage the household to continue with its application for SNAP benefits.

SIGNATURE TYPES AND REQUIREMENTS:

An Application, Recertification, and Simplified Report must be signed to establish a filing date and to determine the deadline for acting on these forms. Signatures on these forms are required to certify a household.

All households have the right to sign any SNAP form in writing.

Acceptable unwritten signatures include electronic signature techniques, recorded telephonic signatures, and gestured signatures in face-to-face interviews.

Criteria for all signatures. All systems for signatures must meet all the following criteria:

1. Record for future reference the household member's assent (signature) and the information to which assent was given.
2. Include effective safeguards against impersonation, identity theft, and invasions of privacy.
3. Not deny or interfere with the right of the household to apply in writing.
4. Comply with the SNAP regulations regarding bilingual requirements.
5. Satisfy all requirements for a signature on an application under all laws and guidance applicable to SNAP, including civil rights laws.

Telephonic signatures. The following provisions apply specifically to telephonic signatures:

1. The telephonic signature system must make an audio recording of the household's verbal assent and a summary of the information to which the household assents. An example of a telephonic signature is a recording of "Yes" or "No", "I agree" or "I do not agree", or otherwise clearly indicating agreement or disagreement during an interview over the telephone. An example of a summary of the information to which the household assents is a recording of a reiteration of the household's details agreed to during the telephone conversation.
2. The telephonic signature system must provide for linkage from the audio file of the recorded verbal assent to the application so that ready access to the household's entire case file is available.

3. The eligibility staff member shall promptly provide to the household member a written copy of the completed application, with instructions for a simple procedure for correcting any errors or omissions.

APPLICATIONS BY OPA STAFF:

Special handling is given to an employee's case and an employee's immediate family's case to avoid a conflict of interest and to ensure privacy.

Cases having a conflict of interest between a household and an OPA employee are assigned to OPA staff accordingly by the Field Office Manager/Supervisor or designee.

SCREEN FOR EXPEDITED PROCESSING:

All SNAP applications must immediately be screened for expedited processing upon receipt. (SNAP 105-1).

DATE OF APPLICATION:

The date the application is received by the OPA is the application date. Eligibility staff members must document the application date on the application. If the application is received outside normal business hours, the OPA will consider the date of application the next business day. For online applications, the date of application is the date the application is submitted, or the next business day if it is submitted after business hours. For telephonic applications, the date of application is the date the household member provides verbal assent (i.e., telephonic signature).

An application (HCS-250 only) previously received regardless of whether the application was or was not processed for TANF or Medicaid can be used as a SNAP application if the household wants to apply for SNAP benefits and the application is less than 30 days old. If determined eligible, benefits are prorated from the request date. The application must be updated during the interview to ensure all SNAP information is captured. Self-Service Portal Applications (apply.mt.gov) are dynamic in that applicants only answer questions relevant to the benefit program they selected; therefore, if a household wants to apply for another program after submitting an SSP application, they need to complete, sign, and submit a paper application or another online application. Households can also apply for additional programs by calling and telephonically signing a Statement of Facts application.

NOTE: SNAP requires only a name, address, and signature (of any type) to submit an application.

When a resident of an institution jointly applies for Supplemental Security Income (SSI) and SNAP benefits prior to leaving the institution, the application date is the date of discharge from the institution.

Action must be taken on all applications received **that contain at a minimum name, address and signature**. The household may voluntarily withdraw its application at any time prior to eligibility determination. The OPA will document in case notes the withdrawal reason, if one was stated, and that the household was contacted to confirm the withdrawal. The household is advised of its right to reapply

at any time after a withdrawal. The *original* application cannot be returned to the household even if the household requests withdrawal of its application.

APPLICATIONS FILED THROUGH THE SOCIAL SECURITY ADMINISTRATION:

In Montana, SSA offices will complete and forward SNAP applications to the OPA.

Whenever a member of a household consisting only of SSI applicants or recipients transacts business at an SSA office, the SSA shall inform the household of:

1. Its right to apply for SNAP benefits at the SSA office without going to the SNAP office; and
2. Its right to apply at a SNAP office if it chooses to do so.

The SSA will accept and complete SNAP applications, including the interview, received at the SSA Office from SSI households and forward them, within one working day after receipt of a signed application, to a designated office of the State agency. SSA shall also forward to the State agency a transmittal form.

An eligibility staff member shall make an eligibility determination and issue SNAP benefits to eligible SSI households within 30 days following the date the application was received by the SSA. Applications will be considered filed for normal processing purposes when the signed application is received by SSA. The expedited processing time standards shall begin on the date the State agency receives a SNAP application.

Households in which all members are applying for or participating in SSI will not be required to see a state eligibility staff member, or otherwise be subjected to an additional application interview. The SNAP application will be processed by the OPA including necessary interfaces and narrating a case note. The OPA shall not contact the household further to obtain information for certification for SNAP benefits unless the application is improperly completed; mandatory verification is missing; or, the OPA determines that certain information on the application is questionable. In no event would the applicant be required to appear at the OPA to finalize the eligibility determination.

The SSA shall prescreen all applications for entitlement to expedited services on the day the application is received at the SSA office and shall mark "Expedited Processing" on the first page of all households' applications that appear to be entitled to such processing. The SSA will inform households which appear to meet the criteria for expedited service that benefits may be issued a few days sooner if the household applies directly at the SNAP office. The household may take the application from SSA to the SNAP office for screening, an interview, and processing.

Re-certifications for these same households can also be completed at an SSA office with the same procedures stated above.

APPLICATIONS FILED BY INCARCERATED INDIVIDUALS:

Applications submitted by incarcerated individuals nearing their release date can be processed. The date the individual is SNAP eligible is the date the individual is released from the facility. This applies

only to new applicant households, not to individuals joining an existing SNAP household. This does not apply to those being released to an ineligible institution (pre-release center). Incarcerated applicants are directed to the online application or provided a paper application, if requested, approximately 5-10 days before release. Applications received up to 30 days prior to the date of release can be processed. The interviews are completed by phone (with the permission and assistance from the facility). All non-waived SNAP regulations and rules apply to the application process.

APPLICATION AND RE-CERTIFICATION COPIES:

The OPA/eligibility staff must offer to provide copies of all applications and re-certifications completed by households regardless of the method by which the applicant submitted the application or re-certification e.g., paper, online, SOF, etc. This offer, the decision by the household whether to receive a copy, and whether and when the copy was provided must be in case notes. The household will have the option to receive the copy of their completed application in electronic format. A copy of the completed application is a copy of the information provided by the client that the OPA has used or will use to determine a household's eligibility and benefit allotment.

TIME FRAME FOR PROCESSING THE APPLICATION:

The application must be processed to provide eligible households the opportunity to participate (receive benefits) as soon as possible, but not later than:

1. Thirty calendar days following the date of application for regular processing; or,
2. Seven calendar days following the date of application for households eligible for expedited services (SNAP 105-1).

SNAP applications processed under regular processing timelines must be processed so the household will receive benefits by the 30th day following the date of application unless the application is properly pending for required verification needed to approve the application. The eligibility staff member must take into consideration mail time, weekends, and holidays. An application is considered properly pending until the 30th day following the application date if the verification requested is required information to approve the application such as income, questionable resources, household composition, etc.

If a household reapplies for SNAP benefits after a break in participation of any length of time, benefits are prorated from the date the household reapplies for SNAP benefits (SNAP 104-4).

EXCEPTION: In the case of migrant and seasonal farm worker households, the term “initial month” means the first month for which the household is certified for participation in SNAP following any period of more than 1 month during which the household was not certified for participation.

INTERVIEWS:

All households applying for SNAP benefits must have an interview conducted by qualified OPA staff prior to initial eligibility determination and at least once every 12 or 24 months thereafter depending on the

household's circumstances. Any responsible household member or an authorized representative can be interviewed. The household may bring any person they choose to the interview.

Households applying online, by mail, fax, or other electronic transmission, or by telephone (if interview not completed) are sent a notice instructing them to complete an interview by calling the toll-free Montana Public Assistance Help Line at 1-888-706-1535 Monday through Friday between 8:00 a.m. and 5:00 p.m. OR to come to the local office during business hours. The notice will provide the Montana Public Assistance Help Line telephone number and instruct households to call or come in within 10 calendar days from the application date for regular SNAP cases and within 7 calendar days from the application date for cases that appear eligible for expedited service.

The notice also instructs the household that if they are not able to hold for the next available staff member, they can use the call back feature and leave a number where they can be reached. Their call will be returned on the same business day or the next business day depending on the time of day the call back was requested.

If the household does not complete the interview within the given time frame, the household is issued a Notice of Missed Interview (NOMI). The NOMI explains the need to complete the interview by the 30th day from their application date.

The purpose of the interview is to review the information on the application and inquire about and resolve any unclear and/or incomplete information. It is also used to advise the household of its rights and responsibilities, application processing standards and its reporting requirements. The interview is conducted as an official and confidential discussion of the household's circumstances. The household's right to privacy and confidentiality must be protected during the interview.

Interviews can be conducted in-person, on the telephone or with a home visit. A home visit must be scheduled in advance with the household. The OPA must inform clients that the OPA will schedule the interview or provide a face-to-face interview if one is requested.

RECERTIFICATION INTERVIEWS:

The household is sent a Notice of Benefit Expiration by the 15th of the month prior to the month the certification period ends. The notice instructs the household to call the toll-free Montana Public Assistance Help Line by the 10th of the month the certification period ends to complete an interview. The household has the right to request an in-person or in-home interview. The notice informs the household that the interview is a recertification process requirement. The notice also instructs the household that when calling the Public Assistance Help Line, if they are not able to hold for the next available staff member, they can use the call back feature and leave a number where they can be reached. Their call will be returned on the same business day or the next business day depending on the time of day the call back was requested.

If the household does not complete the interview within the given time frame, the household is issued a Notice of Missed Interview (NOMI). The NOMI must inform the household they have until the end of their certification period to complete the interview without having to submit a new application form.

EFFECTIVE DATE: July 6, 2022