



**United States  
Department of  
Agriculture**

Food and  
Nutrition  
Service

Northeast Region

10 Causeway St.  
Room 501  
Boston, MA 02222

SEP - 3 2009

Phuoc Cao, Director  
Supplemental Nutrition Assistance Program  
Massachusetts Department of Transitional Assistance  
600 Washington Street, 6<sup>th</sup> Floor  
Boston, MA 02111

Dear Mr. Cao:

This is in response to the Massachusetts Department of Transition Assistance (DTA) request to waive the requirement to interview certain elderly and disabled Supplemental Nutrition Assistance Program (SNAP) households at recertification. DTA's request applies only to those households in which all adult members are elderly or disabled and have no earned income. DTA will continue to interview any household in this category if the household requests an interview or if there are any outstanding issues or questions about the recertification application. By targeting this relatively stable group of households for exemption from the recertification interview requirement, the State agency seeks to improve program management, particularly during a time of burgeoning SNAP caseloads resulting from the recent economic downturn. Additionally, DTA believes that the waiver would improve customer service for elderly and disabled households with no earnings, who are typically certified for up to 24 months, by eliminating the need for a recertification interview unless it is deemed necessary based on household circumstances.

Food and Nutrition Service (FNS) recognizes the need for additional measures for State agencies to manage rapid caseload growth and agrees that this waiver may provide administrative relief for both the State agency and the targeted group of clients. For this reason, FNS is approving this waiver for an 18-month period from September 1, 2009 through February 28, 2011.

FNS approval is based on the following conditions:

- The waiver applies only to household at recertification;
- The State agency must grant an interview (telephone or face-to-face) if one is requested by the household or its authorized representative or if the State agency deems it necessary;
- The waiver is limited to households in which all adults are elderly or disabled with no earned income, determined to be eligible for recertification and have completed all other recertification requirements, including verification;

- No application for a household in the targeted group will be denied without an attempt to schedule an interview; and
- The State agency must submit to FNS an analysis of data on households subject to the waiver. The State agency's analysis of the waiver must include all information that is outlined in Tables 1 and 2 of Attachment 2. The analysis and evaluation report will be provided as specified in DTA's August 3, 2009 correspondence, which is included as Attachment 3. DTA shall provide post-waiver data on all households subject to the waiver for lines 12, 14, 15 and 17 on Attachment 2. DTA must provide its initial analysis to FNS no later than 9 months after the implementation of the waiver (May 2010). If DTA wishes to extend the waiver beyond the 18 month approval period, an analysis of the first year of waiver operation will be due no later than 15 months after the implementation of the waiver (November 2010). If, however, DTA does not wish to extend the waiver, a closeout report will be due no later than 21 months after the implementation of the waiver (May 2011). Additionally details on the requirements of the waiver analysis are discussed in item 11 in Attachment 1.

FNS will consider an extension of the waiver for one additional year, provided that the evaluation does not indicate a negative effect on program access or program integrity among the households subject to the waiver in comparison to other households.

If you have any questions, please contact Beth Soukhanov at (617) 565-6403.

Sincerely,



Mary Ann Ferris, Director  
Supplemental Nutrition Assistance Program  
Northeast Region

Enclosure

cc: Mary Ann Marshall

**Attachment 1**

**WAIVER RESPONSE**

1. **Waiver serial number:** 2090055
2. **Type of request:** Initial
3. **Primary regulation citation:** 7 CFR 273.14(b)(3)
4. **Secondary regulation citation:** 7 CFR 273.2(e)(2)
5. **State:** Massachusetts
6. **Region:** Northeast
7. **Regulatory requirements:** Federal regulations at 7 CFR 273.14(b)(3) require State agencies to conduct a face-to-face interview as part of the recertification process. The regulations at 7 CFR 273.2(e)(2) also permit State agencies to waive the face-to-face interview in favor of a telephone interview for all households in which all members are elderly or disabled and have no earned income.
8. **Description of proposed alternative procedures:** The Massachusetts Department of Transitional Assistance (DTA) requests to waive the recertification interview for any household in which all adult members are elderly or disabled and have no earned income, provided that the household meets all other recertification requirements, including any required verification. DTA would continue to interview any elderly or disabled households in this category if the household requests an interview or if there are any outstanding issues or questions about the recertification application. By targeting this stable group of households for exemption from the recertification interview requirement, the State agency seeks to improve its management of a burgeoning Supplemental Nutrition Assistance Program (SNAP) caseload resulting from the recent economic downturn. Additionally, DTA believes that the waiver would improve customer service for elderly and disabled households with no earnings, which are typically certified for up to 24 months, by requiring a recertification interview only if necessary based on household circumstances.
9. **Action and reason for approval or denial:** Food and Nutrition Service (FNS) recognizes the need for additional State agency measures to manage rapid caseload growth and agrees that this waiver may provide administrative relief for both the State agency and the targeted group of clients. FNS is approving Massachusetts' request in order to simplify the administration of SNAP and to improve customer service for stable elderly or disabled households.
10. **Regulatory or legislative basis for action:** FNS is approving this waiver under the authority of 7 CFR 272.3(c)(1)(ii), which authorizes waivers that would improve Program administration.

11. **Conditions and reasons:** FNS approval is based on the following conditions:

- The waiver applies only at recertification;
- The State agency must grant an interview (telephone or face-to-face) if one is requested by the household or its authorized representative or if the State agency deems it necessary;
- The waiver is limited to households in which all adults are elderly or disabled with no earned income, determined to be eligible for recertification and who have timely completed all other recertification requirements, including verification;
- No application for a household in the targeted group will be denied without an attempt to schedule an interview; and
- The State agency must submit to FNS an analysis of data on all households subject to the waiver that includes all information outlined in Tables 1 and 2 of Attachment 2. As specified in DTA's August 3, 2009 evaluation plan, which is included as Attachment 3, this information will include both a pre-test/baseline measure of 100 telephone interviews of households who meet the criteria for exemption from the recertification interview and a post-implementation review of 200 target households, half of which were not interviewed and half of which were interviewed. The objectives of the analysis will be to determine the waiver's:
  - Use of appropriate criteria to select households for the "no interview" group;
  - Effect on providing timely and accurate benefits;
  - Effect on program access and client satisfaction; and
  - Effect on aspects of the eligibility process.

DTA shall provide post-waiver data on all households subject to the waiver for line 12, 14, 15 and 17 on Attachment 2. DTA must provide its initial analysis to FNS no later than 9 months after the implementation of the waiver (May 2010). If DTA wishes to extend the waiver, an analysis of the first year of operation of the waiver will be due no later than 15 months after the implementation of the waiver (November 2010). If, however, DTA does not wish to extend the waiver, a closeout report will be due no later than 21 months after the implementation of the waiver (May 2011).

12. **Information required for extension:** FNS will consider a one-year extension of this waiver based on the outcomes of the waiver and provided that the evaluation (due November 2010) does not indicate a negative effect on program access or program integrity among the households subject to the waiver.
13. **Expiration date:** This waiver is effective September 1, 2009 through February 28, 2011.
14. **Limitation, if any, on regional office approval of like requests:** The approval is for the Massachusetts State Agency only.
15. **Quality control procedures:** No special QC procedures are required for cases subject to the provisions of this waiver. Cases should be reviewed using standard review procedures contained in the FNS Handbook 310.
16. **Date of national office action:** August 27, 2009
17. **Date of State Agency's request:** April 21, 2009
18. **Date of regional office transmittal of request to national office:** April 30, 2009

**Attachment 2**

|    | A  | B | C                                  | D |
|----|--|---|------------------------------------|---|
| 1  | <b>Table 1</b><br><b>Number of Recertifications, Approvals, Denials, Incomplete</b><br><b>and Payment Accuracy</b><br><i>Time Period</i> |   |                                    |   |
| 2  |  |   |                                    |   |
| 3  |  |   |                                    |   |
| 4  |  |   |                                    |   |
| 5  |  |   |                                    |   |
| 6  |  |   |                                    |   |
| 7  | <b>Elderly/Disabled Households w/o Earned Income</b>   |   |                                    |   |
| 8  |  |   |                                    |   |
| 9  | <b>Pre-Waiver</b>  |   | <b>Post-Waiver</b>                 |   |
| 10 |  |   |                                    |   |
| 11 |  |   |                                    |   |
| 12 | # Expiring Certifications  |   |                                    |   |
| 13 |  |   | <b>No Interview      Interview</b> |   |
| 14 | # Recertification Applications   |   |                                    |   |
| 15 | Approved   |   |                                    |   |
| 16 | Denied   |   |                                    |   |
| 17 | # Households Receiving Recert. Applications That Don't Reapply (Item 12-Item 14)   |   |                                    |   |
| 18 |  |   |                                    |   |
| 19 | # Households w/  |   |                                    |   |
| 20 | Medical Deduction  |   |                                    |   |
| 21 | Avg. Amount  |   |                                    |   |
| 22 | Shelter Deduction  |   |                                    |   |
| 23 | Avg. Amount  |   |                                    |   |
| 24 |  |   |                                    |   |
| 25 | <b>Payment Accuracy</b>  |   |                                    |   |
| 26 | <b>Error Cases</b>   |   |                                    |   |
| 27 | Total >\$25  |   |                                    |   |
| 28 | Client   |   |                                    |   |
| 29 | Agency   |   |                                    |   |
| 30 |  |   |                                    |   |
| 31 | <b>Error Dollars</b>   |   |                                    |   |
| 32 | Total >\$25  |   |                                    |   |
| 33 | Client   |   |                                    |   |
| 34 | Agency   |   |                                    |   |
| 35 |  |   |                                    |   |

|    | A   | B               | C |
|----|---|-----------------|---|
| 1  | Attachment 2                                    |                 |   |
| 2  | Table 2   |                 |   |
| 3  | Waiver Recertification Process Outcomes         |                 |   |
| 4  | Time Period                                     |                 |   |
| 5  |   |                 |   |
| 6  | Elderly/Disabled Households w/o Earned Income   |                 |   |
| 7  |   | # of Households |   |
| 8  |   |                 |   |
| 9  |   |                 |   |
| 10 | Recertification Applications Approved           |                 |   |
| 11 | (1) Interview Conducted - telephone             |                 |   |
| 12 | (2) Interview Conducted - face-to-face          |                 |   |
| 13 | (3) Interview Scheduled, then cancelled         |                 |   |
| 14 | (4) Interview not needed/waived                 |                 |   |
| 15 | Total Applications Approved (Lines 11+12+13+14) |                 |   |
| 16 |   |                 |   |
| 17 | Recertification Applications Denied             |                 |   |
| 18 | (1) Interview conducted/denied                  |                 |   |
| 19 | (2) Interview scheduled, client missed          |                 |   |
| 20 | Total Applications Denied (Lines 18 + 19)       |                 |   |

**Attachment 3**



**DEVAL L. PATRICK**  
Governor

**TIMOTHY P. MURRAY**  
Lieutenant Governor

**Commonwealth of Massachusetts**  
*Executive Office of Health and Human Services*  
**Department of Transitional Assistance**  
600 Washington Street • Boston MA 02111

**JUDYANN BIGBY, M.D.**  
Secretary

**JULIA E. KEHOE**  
Commissioner

August 3, 2009

Arthur Foley  
Director  
Program Development Division  
USDA Food and Nutrition Service  
3101 Park Center Drive  
Alexandria, VA. 22302

Dear Mr. Foley:

As a follow-up to discussion in recent teleconference regarding our request for waiver of the recertification interview for certain elderly/disabled households, Massachusetts Department of Transitional Assistance has formulated the following evaluation plan, which we hope you will find acceptable as our means of ensuring program integrity and customer service, while streamlining administrative processes for our heavily-burdened staff.

The primary vulnerability among the proposed impacted cases is the possibility of payment error due to either failure to report an eligibility-related change or misinterpretation of a question, resulting in the reporting of incorrect information. Conversely, the greatest potential benefit is in easier access to benefits for households that we believe are typically less error-prone. Our evaluation plan is designed to detect whether these cases are, in fact, relatively error free, and whether the lack of an interview improves access to the program. Both goals will be accomplished by a case record review conducted in conjunction with a client interview to understand the validity of these assumptions.

Pre-Implementation Review

For the pre-test/baseline measure, our Local Office Quality Control (LOQC) unit will conduct 100 interviews with clients who meet the criteria for selection in the "No Interview" program that were certified in the previous month. The primary focus of the review will be on the correctness of the cases, especially in the areas most susceptible to change, such as household composition, income, and medical expenses. The telephone interview will allow us to validate the accuracy of the information reported in existing verifications and documentation. In this way we will determine:

- Whether the criteria for selection were accurate;
- Whether that the benefits were delivered in a timely and accurate way;
- Whether the new process improved access to the program and increased client satisfaction; and
- Whether any aspect of eligibility was more likely to be handled improperly.

To properly compare the changes that result from the revised process, we will need to compare the same measures later in the implementation phase to determine if any significant variable has changed, either with regard to eligibility for benefits, access to the program, or satisfaction with the process.

#### Post- Implementation Review

Six months after implementation, LOQC will conduct 200 follow-up reviews, also from households that had been recertified the previous month. Half of the households will comprise a control group that were recertified without the waiver (i.e., an interview was conducted). The other half will comprise the group that were recertified under the conditions of the waiver, and were not interviewed. Comparisons to the pre-test data will determine if the lack of an interview had a detrimental effect on the four measures noted above: the criteria for selection, the timeliness and accuracy of the benefit delivery, improved access to the program, and client's satisfaction with the process.

Our analysis will be available approximately 30 days after the follow-up reviews are completed and will focus on the error rate and satisfaction with the new process. An evaluation report will be provided to USDA approximately nine months after implementation of the program. The evaluation report will include the data requested in the updated matrix you provided to us after the conference call.

DTA is excited at the prospect of approval of this waiver. Please let me know if you have any questions about this proposed evaluation plan or if there are any additional requirements you would like included in this draft. We look forward to partnering with FNS in taking steps to improve program administration without sacrificing program integrity or customer service.

Sincerely,



Phuoc Cao  
Director, SNAP

cc: M.A. Ferris, K. Guarin, S. Brown, B. Goodro, M.A. Marshall