



FAMILY INDEPENDENCE ADMINISTRATION

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POLICY DIRECTIVE #10-03-ELI *(This Policy Directive Replaces PD #02-39-ELI)*

TRANSITIONAL BENEFIT ALTERNATIVE (TBA) FOR FOOD STAMPS

Date: January 26, 2010	Subtopic(s): Food Stamps
AUDIENCE	The instructions in this policy directive are for Job Center and Non Cash Assistance Food Stamp (NCA FS) Center staff and informational for all other staff.
REVISIONS TO THE PRIOR DIRECTIVE	<p>This policy directive has been revised as follows:</p> <ul style="list-style-type: none"> • Updated codes from the list that generate Transitional Food Stamp Benefits (TFSB). • Added the eligibility of Safety Net Cases with Children for FS Transitional Benefit Alternative (TBA). • Updated the FS Implications section to include information on participants who are enrolled in a grant diversion program and are receiving TBA FS benefits. • Added reasons why a household is ineligible for TBA. • Updated the Implications section. • Updated the Policy section to include the rule covering ABAWD (able-bodied adult without dependents) requirements for TBA FS benefits.
POLICY New	Effective December 1, 2009. Safety Net Cash Assistance (SNCA)/ Safety Net Non-Cash Assistance (SNNC) households with children (a child under 18 years of age or a child under 22 years of age living with his/her parents) whose Cash Assistance was closed with certain closing codes, will receive five months of Transitional Benefit Alternative (TBA) Food Stamps (FS).

HAVE QUESTIONS ABOUT THIS PROCEDURE?
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Family Assistance (FA) cases closed with certain codes will receive five months of TBA FS.

This extension will allow the household to adjust financially before food stamp eligibility is re-determined.

Under the provisions of this program, the household must be in receipt of Food Stamps (FS) on a recurring basis at the time of the Cash Assistance (CA) closing. All TBA FS will be calculated by removing the CA income from the pre-CA closing FS budget. No other changes or budget comparisons will be made, and TFSB will remain frozen at the set level for the duration of the extension.

These households will be informed that they may voluntarily report changes that will result in an increase in food stamp benefits, but will have to be interviewed in order to receive the increase. If the Household reports a change before the expiration of the transitional period, which results in an increase in benefits, their transitional period will end.

Households in receipt of TBA are not required to report changes in circumstances during the transition period. However, individuals who are subject to ABAWD (able-bodied adult without dependents) requirements must report changes timely when monthly participation in employment or other work activities falls below 80 hours per month during the TBA period. The changes must be reported within 10 days after the end of the month when their work hours fell below 80 hours.

BACKGROUND

All suffixes on a multi-suffix case would have to close to be eligible.

The closing notice informs the participant when the FS benefits will expire and how to apply for ongoing FS.

The implementation of TBA benefits permits many households to receive five additional months of FS benefits after a household's CA case is closed.

Households whose **FA**, or **SNCA/SNCC** case with children are closed with one of the following codes will automatically receive five months of TBA FS, even if the five months extend beyond the certification period. The participant will receive a Client Notice System (CNS) notice informing him/her of his/her eligibility for TBA FS and when to apply for NCA FS.

Codes that generate TFSB	E18	E19	E30	E31	E32	E33	E36	E39	F12	F33
	F40	F76	F84	G01	G24	G25	G26	G30	G31	G32
Revised	G89	G92	G96	G99	GX1	GX2	GX3	M49	M50	N13
	N14	N17	N49	N50	R10	R11				

Cash Assistance	Households in receipt of TBA FS can re-apply for Cash Assistance (CA) during the transition period. If determined eligible for ongoing assistance, the household would lose its TBA FS eligibility, and eligibility for FS must be re-determined.
NCA FS	A household in receipt of TBA FS can apply for NCA FS 30 days before the transitional period expires, but the case cannot be accepted prior to the expiration of the transition period, except in instances where the household reports a change that will increase his/her FS benefit.
New information	<p><u>Reasons Why a Household is Ineligible for TBA</u></p> <p>TBA may not be provided to a household if it includes a member who, at the time of the closing, has:</p> <ul style="list-style-type: none"> • Violated a TANF or SNA requirement and the Agency is imposing a comparable food stamp sanction or closing (e.g., failed to provide or apply for a social security number, or failed to recertify); • Violated a FS work requirement; • Committed a CA or FS Intentional Program Violation (IPV); or • Failed to comply with FS reporting requirements, (e.g., the Agency discovered unreported income or resources through computer matching, and the household is not subject to the six month reporting requirement.

REQUIRED ACTION

A scratch pad budget must be calculated to determine if the FS benefits will increase.

If a household in receipt of TBA FS reports and verifies changes in circumstances that will increase his/her FS grant, actions must be taken based on the following:

- If the NCA FS case has not been established, but the household has received FS under the CA Case Number, the JOS/Worker at the Job Center must process the change.
- If the case is **AC** at the NCA FS Center, the Worker at the NCA FS Center must process the change.

JOS/Worker at Job Center must:

- Annotate the **TAD** for the CA case to shorten the FS authorization period by entering the last date of the month in which TBA benefits will be issued in element **262** (FS “To Date”),.
- Register a NCA FS case using the co-located NCA FS center’s designation. The FS “From Date” should be the first day of the month following the month the FS benefits were issued.
- Make an eligibility determination and **AC** the NCA FS case.

NCA FS Workers in the Customer Service Information Center (CSIC) or the Mail Processing Unit (MPU) must:

- Calculate and save a new budget.
- Enter the budget number on the **TAD** in element **016** (Notice Budget No.).


A CNS Notice will be generated and sent to the participant.

PROGRAM IMPLICATIONS

Model Center Implications

There are no Model Center implications.

Paperless Office System (POS) Implications

Workers at Job Centers may access WMS to calculate a FS scratchpad budget by using the WMS plug .

If the TFSB household requests a recertification interview, schedule an appointment by selecting the Schedule Appointments activity on the Action tab. Make a case comment for the TBA program by clicking on the Case Comments icon .

If the participant keeps the scheduled recertification interview, shorten the TFSB period by entering the last day of the month in which TFSB were issued and register a new NCA FS case.

Food Stamp Implications

Households eligible for extended FS, under the provisions of the TBA, will receive five months of FS benefits prior to having their FS eligibility re-determined.

Households not eligible for TBA may require a separate FS determination in accordance with current procedures.

TBA FS implications for participants in grant diversion.

Effective July 1, 2009, TEAP (Grant Diversion) cases became eligible for TBA FS for up to five consecutive months. If the household is no longer participating in Grant Diversion, the TBA period will end and the household's eligibility for FS must be redetermined.

Individuals participating in TEAP during the TBA FS period who fail to comply with TEAP, may be subject to a sanction after the end of the TBA period.

TEAP participants who are eligible for TBA FS, and are receiving a zero dollar CA grant, will have his/her FS benefit determined by removing the CA income from the last CA FS budget. New earned income is not counted.

All TEAP cases are six month reporters and must comply with current recertification and periodic reporting requirements.

Medicaid Implications

There are no Medicaid implications.

LIMITED ENGLISH SPEAKING ABILITY (LESA) AND HEARING-IMPAIRED IMPLICATIONS

For Limited English Speaking Ability (LESA) and hearing-impaired applicants, make sure to obtain appropriate interpreter services in accordance with [PD #09-14-OPE](#) and [PD #08-20-OPE](#).

FAIR HEARING IMPLICATIONS

Avoidance/ Resolution

Staff must ensure that cases eligible for TBA are processed in accordance with the instructions outlined in this policy directive.

Ensure that all case actions are processed in accordance with current procedures and that electronic case files are kept up to date. Remember that applicants/participants must receive either adequate or timely and adequate notification of all actions taken on their case.

Conferences

A TBA participant can request and receive a conference with a Fair Hearing and Conference (FH&C) AJOS/Supervisor I at any time. If an applicant/participant comes to the Job Center requesting a conference, the Receptionist must alert the FH&C Unit that the individual is waiting to be seen. In Model Offices, the Receptionist at Main Reception will issue an FH&C ticket to the applicant/participant to route him/her to the FH&C Unit and does not need to verbally alert the FH&C Unit staff.

The FH&C AJOS/Supervisor I will listen to and evaluate any material presented by the TBA participant, review the case file and discuss the issue(s) with the JOS/Worker responsible for the case and/or the JOS/Worker's Supervisor. The AJOS/Supervisor I will explain the reason for the Agency's action(s) to the applicant/participant.

Should the TBA participant elect to continue his/her appeal by requesting or proceeding to a Fair Hearing already requested, the FH&C AJOS/Supervisor I is responsible for ensuring that further appeal is properly controlled and that appropriate follow-up action is taken in all phases of the Fair Hearing process.

Conferences at Food Stamp Centers

If an applicant/participant comes to the NCA FS Center and requests a conference, the Receptionist must alert the Center Manager's designee that the applicant/participant is to be seen. If the applicant/participant contacts the Eligibility Specialist directly, advise the applicant/participant to call the Center Manager's designee.

In Model Offices, the Receptionist at Main Reception will issue a FS Conference/Appointment/Problem ticket to the TBA participant to route him/her to the NCA Reception area and does not need to verbally alert the Center Manager. The NCA Receptionist will alert the Center Manager once the TBA participant is called to the NCA Reception desk.

The designee will listen to and evaluate the TBA participant's complaint regarding the FS case. The Center Manager's designee is responsible for ensuring that further appeal by the applicant/participant through a Fair Hearing request is properly controlled and that appropriate follow-up action is taken in all phases of the Fair Hearing process.

Evidence Packets

For Fair Hearing purposes, all evidence packets must include complete and relevant documentation.

REFERENCES

[02 ADM-07](#)
[09 ADM-11](#)
[09-ADM-22](#)
7 CFR 273.12

RELATED ITEMS

[PD #10-02-EMP](#)
[PD #09-39-SYS](#)
[PB #08-01-ELI](#)
[Food Stamp Separate Determination Manual](#)