

Bulletin

December 14, 2007

Minnesota Department of Human Services □ P.O. Box 64941 □ St. Paul, MN 55164-0941

OF INTEREST TO

- County Directors
- Social Services Supervisors and Staff
- County Financial workers
- Employment Services Providers
- Tribal Representatives
- Social Services
- Health Care
- Child Support Supervisors and Staff
- Child care Assistance Program Supervisors and Workers

ACTION/DUE DATE

Effective immediately.

EXPIRATION DATE

December 11, 2009

DHS Issues Policy Information for the “Safe at Home” Confidential Address Program

TOPIC

Safe at Home Program.

PURPOSE

To provide program instruction on policy applications for applicants, participants and enrollees who are enrolled in the Safe at Home Program.

CONTACT

For questions about this bulletin contact your policy help desk.

SIGNED

TIM WILKIN
Assistant Commissioner

A. BACKGROUND

Effective September 1, 2007, the Minnesota Safe At Home address confidentiality program (SAH) assists survivors of domestic violence, sexual assault, and stalking (“participants”) by providing a substitute address for individuals who move or are about to move to a new location unknown to their aggressors. Safe At Home provides a free confidential mail-forwarding service and optional absentee voter registration. The Minnesota Secretary of State is administering the program. See attached copy of the *Participant Guide to Services*.

Here’s a summary of how SAH will work:

- Participants will share a common P.O. Box but each participant will be assigned a unique Lot number. The Lot number is very important because it distinguishes them from other participants. If the Lot number is not included in the address, mail may be delayed or may never reach the participant.
- The address that will be provided by Safe at Home participants will be:

Applicant/Enrollee/Participant’s Name
Lot # XXXXXX
P.O. Box 17370
St. Paul, MN 55117- 0370

- The Secretary of State is required to forward participants’ mail to them from that address at least every second business day.
- Under the statute governing the Safe at Home program, the Secretary of State cannot release any participant data, including confirming or denying program participation, without a valid court order. Consent for release of information from a Safe at Home applicant, eligible person or program participant to Safe at Home is not sufficient to release participant data.

Here’s an overview of how SAH may impact participants who are receiving public assistance or other human services:

- Applicants, participants and enrollees must, under certain circumstances, provide documentation in the form of the Safe at Home Identification Card (see attached example of the card) that verifies they are participating in the Safe at Home Program.
- If applicants or enrollees indicate they are participating in the Safe at Home Program, counties must inform them that in order to receive certain services and maintain compliance under these programs, the county needs to know the county where they actually live.
- DHS Program Data: Even though DHS program data is governed by a different statute, it is important to inform applicants, participants and enrollees that all information in the DHS

system is private and is only released as authorized by law or with consent of the subject of the data. All protective measures must be taken to limit access to address information.

- Additional DHS program-specific guidance is provided below.

B. Diversionary Work Program (DWP)/Minnesota Family Investment Program (MFIP)

Applicants and participants of the following programs must reveal their county of residence. They do not have to reveal their home address, and may use the SAH address in lieu of their home address as follows:

Apply for Assistance - The address on the Combined Application Form (CAF) can be the Safe at Home Program address if the applicant or recipient has provided documentation (s)he is participating in the program. The applicant, enrollee or participant must indicate their county of residence on the application or recertification form.

Employment Services (ES) - To provide services, ES agencies must know an applicant, enrollee or participant's county of residence. Note: SAH participants may not receive some ES notices timely. This may affect a participant's ability to respond within the required time period. ES providers will need to make exceptions in these situations. *Note: The mailing address received from MAXIS will be the Safe at Home Program address.*

Vendoring of rent and utilities - The participant will need to provide documentation of the amount of rent and utilities and payee. Allow the participant to enter the Safe at Home Program address on the DHS 2952 (Authorization for Release of Information About Residence and Shelter Expenses) or utility bill along with the county the participant actually lives in. The worker may need to follow-up with the landlord or vendor if the information provided is questionable.

Counting of rental assistance - If the participant is receiving rental assistance, allow the participant to use the Safe at Home Program address on the DHS 2952 (Authorization for Release of Information About Residence and Shelter Expenses) along with the county the participant actually lives in.

Sanction Notices - These may not be received by the participants when anticipated, and the ability of the participant to respond within the required time period will be affected. The ES provider may need to make exceptions in these situations.

Closing notices for late Household Report Form (HRF) - These may not be received by the participants when anticipated, and the ability of the participant to respond timely will be affected. County workers will need to make exceptions to these situations.

Emergency Needs – The county of residence must be provided to determine which county is responsible for emergency needs. See above for what information is needed to vendor benefits.

Code applicant or recipient cases who are participating in the Safe at Home Program “privileged” to further ensure information about these cases is protected and special consideration is given.

MAXIS instructions for DWP and MFIP

1. Enter the Post Office box address provided by the Secretary of State as the residential address and the mailing address on Stat/ADDR
2. The Resi Cty Code is the county which the client resides in.
3. These cases need to be updated to the MAXIS "PRIV" status so only the worker and worker supervisor have the ability to view the case information. To have the case put into the PRIV status, please send a MAXIS email to "HELP" and indicate in the email that the case is a Safe at Home case.

C. CHILD CARE ASSISTANCE PROGRAM

If an applicant, enrollee or participant indicates they are participating in the Safe at Home Program, the county must inform them that in order to receive child care assistance as a parent, counties needs to know the county where they actually live. The applicant or participant must provide documentation (Identification Card) that verifies that they are participating in the Safe at Home Program.

DWP/MFIP Child Care Assistance Program – The county of residency for DWP/MFIP child care assistance applicants and participants should be the same as the employment services and cash assistance programs. The mailing addresses in MEC² will be the Safe at Home Program address and should be the same as MAXIS and WF1.

Transition Year Child Care Assistance Program (TY) Applicants or participants must inform the county of their county of resident to receive services.

Basic Sliding Fee Child Care Assistance Program (BSF) – Applicants or participants must inform the county of their county of residence to receive services or to be added to the county’s waiting list. The mailing address in the MEC2 system will be the Safe at Home Program address.

Notice of Adverse Actions – These may not be received by the participant when anticipated, and the ability for the individual to respond timely will be affected. Exceptions in these situations may need to be made for parents.

Counties should code applicant or participant cases who are participating in the Safe at Home Program “privileged” to further insure information about these cares are protected and special consideration is needed. .

D. CHILD SUPPORT

When a child support worker is notified or becomes aware that a participant on a case has entered the Safe At Home Program, the following actions should be taken on all cases for that participant:

- 1) Update both the mailing and residential address for that participant to the post office box address provided by the Secretary of State; do not purge previous address history.
- 2) Code the case with ‘Y’ in the Safety Concerns field on the Good Case Safety Concerns (GCSC) screen in PRISM.
- 3) Fill out and submit the PRISM Global Block form located on DHS SIR, under CSED Forms. The case will then be coded as ‘high profile’ and only the assigned Child Support Worker and Supervisor will be able to access that case.
- 4) If there is not an existing court order on a case, the county of residence is needed in order to know in which Judicial District to bring an action. Ask the participant for their county of residence, and add the county of residence in CAAD note. If the participant is receiving public assistance, the county of residence may be available from the MAXIS system.

If the applicant or participant is a non-public assistance (NPA) client, the identification card issued by the Secretary of State should be presented as proof of participation in the Safe At Home Program. In most cases, public assistance (PA) participants will notify their Financial Worker that they are enrolled in the Safe At Home program. As there is no planned interface with MAXIS to alert Child Support staff via PRISM of a Safe At Home participant, local agencies will need to set up an internal process in sharing this information. However, Child Support staff will receive address updates from the MAXIS interface. Child support officers will need to familiarize themselves with the Safe At Home program addresses to ensure that the appropriate action is taken on these cases.

The residential address is not displayed and should not be used; the Secretary of State is the designated agent for service of process for Safe at Home participants. Service of process documents will be forwarded to participants by the next business day, at the latest. The Secretary of State will accept service by first class mail, including certified mail, sent to the Safe at Home address. Service of process correspondence, including summonses, subpoenas, notices, motions, demands, or other legal documents should be in envelopes with their exterior clearly marked "Service of Process." Please address mail completely, using the assigned lot number. Once mail is received, service is complete. If personal service is required, papers should be served upon the Secretary of State at the following address:

State Office Building, Room 174
100 Martin Luther King Jr. Blvd.,
St. Paul, MN 55155

Note: A Safe At Home participant can be a custodial or non custodial parent.

Child support staff should review policy and procedural information for Safety Concerns, Good Cause, Rule 11, Data Practices, and Global Blocking located under User Documentation on DHS SIR, under PRISM/Policy Documents.

Child Support Policy and Procedures will be updated to include Safe At Home information in the future.

E. HEALTH CARE PROGRAMS

Minnesota Health Care Programs (MHCP) applicants and enrollees may use the Safe at Home designated address as their mailing address. They are not required to verify their participation in Safe at Home when apply or renewing health care coverage. However, applicants and enrollees must identify their current county of residence.

Good cause for late or nonpayment of MinnesotaCare or MA-EPD premiums and for late renewals

Safe at Home participants may request and be granted good cause determinations for late premium payments and for late submission or completion of renewals.

Example 1:

Mary Jane's MinnesotaCare coverage was cancelled for nonpayment of the November premium effective October 31st. On November 3rd, Mary Jane contacts MinnesotaCare and states that her mail was delayed due to participation in the Safe at Home program. She did not receive her premium notice until that day. Mary Jane's Safe at Home address provides verification that she is a Safe at Home participant.

Action: Explain to Mary Jane that because she is a Safe at Home participant, she has good cause for nonpayment. She may:

- Request reinstatement due to good cause for nonpayment of premiums. To be granted good cause she must Pay the missing premium.

Coverage may not be reopened until the premium is received. She will owe a premium for the current month +1, which must also be paid by the end of the current month; or

- Follow the regular reinstatement process and pay all due premiums by the 20th day of the month. See HCPM Chapter 25.05.15.

If Mary Jane chooses to claim good cause:

- Document her request for good cause in case notes.
- Track for receipt of the missing premium payment.
- Contact the MMIS Help Desk to reopen coverage once the premium has been posted.

Mary Jane does not need to submit a written statement requesting good cause for nonpayment.

Example 2:

Nancy's MA-EPD coverage is cancelled effective December 1 because she did not pay her December premium. Nancy sends a letter to her worker to appeal the cancellation because her mail was delayed by the Secretary of State's Office. Nancy's Safe at Home address verifies that she is a Safe at Home participant.

Action: Since Nancy is a SAH participant and she states that her premium was late due to a delay in receiving her mail, she has good cause for late payment of her premium.

- Contact the Special Recovery Unit to inform them of Nancy's situation and her claim of good cause for nonpayment. Request notification when Nancy's premium is received.
- Reinstate Nancy's coverage once her premium is paid.

Example 3:

Julian's MinnesotaCare coverage was cancelled effective December 31st because he failed to submit a renewal form. On January 5th, Julian contacts his MinnesotaCare worker and states that his renewal packet and notice of cancellation were both delayed by the Secretary of State's Office. He is a SAH participant.

Action: Since Julian is a Safe at Home participant, and his renewal was late due to a delay in receiving his mail, he has good cause for late renewal.

- Process Julian's renewal form as though it was received timely.
- Contact the MMIS Help Desk for help resetting his eligibility dates. If he remains eligible and pays the monthly premium, reinstate his coverage.

MAXIS instructions for Minnesota Health Care Programs

1. Enter the Post Office box address provided by the Secretary of State as the residential address and the mailing address on STAT/ADDR
2. The Resi Cty Code is the county which the client resides in.

3. For safety and privacy reasons, SAH cases must be updated to the MAXIS "PRIV" status so only the worker and worker's supervisor can view the case information. To have the case put into the PRIV status, please send a MAXIS email to "HELP" and indicate in the email that the case includes a Safe at Home participant.

MMIS Instructions for Minnesota Health Care Programs

1. For MA, GAMC or other eligibility determined on MAXIS:
 - a. Enter eligibility spans on RELG as usual with program eligibility and dates to match MAXIS. Enter the appropriate county code in the County of Financial Responsibility (CFR) field. The CFR code may be different than the Safe at Home address and/or the enrollee's actual county of residence.
2. For MinnesotaCare or other eligibility maintained on MMIS:
 - a. Enter the Safe At Home address in the Residential Address field, and the code for the enrollee's actual county of residence in the County field on RCAD. Users may receive a warning edit stating "WARNING: THE ADDRESS AND COUNTY CODE MUST BE UPDATED AT THE SAME TIME". Bypass this warning edit by transmitting again. Do not enter a Medical Mailing Address. Delete the Medical Mailing Address if one exists.
 - b. Enter eligibility spans on RELG as usual. Enter the appropriate county code in the County of Financial Responsibility (CFR) field. The CFR code may be different than the Safe at Home address and/or the enrollee's actual county of residence.

F. Food Support

Applicants and recipients of Food Support may use the Safe at Home designated address as their mailing address. They are not required to verify their participation in Safe at Home when applying or recertifying for Food Support. Applicants and recipients must identify their current county of residence.

G. Legal Reference

Minnesota Statutes 2007, Chapter 5B. Data Protection for Victims Of Violence

Special Needs

This information is available in other forms to people with disabilities by contacting us at (651) 431-2283 or toll free at 888-938-3224 or through the Minnesota Relay Service at 800-627-3529 (TDD), 711 or 877-627-3848 (speech to speech relay service).



Safe at Home

MINNESOTA SECRETARY OF STATE

Mark Ritchie

Participant Guide to Accessing County Services

There are very few circumstances in which county or state human services will need more than your county of residence. If you are a current or prospective recipient of county-based services such as food stamps, child care assistance, child support enforcement, Minnesota Family Investment Program (MFIP), Medicaid, General Assistance Medical Care, MinnesotaCare or emergency assistance, you may still get these services in your actual county of residence using your Safe at Home address. You will need to provide your county of residence when applying for services. Remember these tips when you apply for county-based assistance:

- **Ask the county to flag your records as “privileged”** if you seek services that require you to disclose some or all of your actual address. This means that only certain workers will have access to your records.
- Be prepared to **show your Safe at Home card to verify participation** in the program. Our phone number is listed on the back of your card and staff will be available to explain the Safe at Home program. We cannot, however, verify your participation in the program because that data is private.
- Please be sure to provide your **complete Safe at Home address, including your lot number**, on all applications you send to the Minnesota Department of Human Services or county social services office.
- **Respond immediately to any notices you receive from county workers or the Minnesota Department of Human Services.** Your mail is already delayed by at least one day by participating in Safe at Home. Counties issue notices fairly routinely requiring you to respond within 10 days and failing to respond could result in a loss of benefits.
- Call Safe at Home if you are required to obtain verification of residency in a particular county. **We will help you get verification of county of residence** without compromising your actual address.



Minnesota Secretary of State "Safe at Home" Address Confidentiality Program Card

By law all entities public and private must use this address for all records related to the program participant named below.

All correspondence must include the name and complete address as shown below.

Full Name

Lot # XXXXXX

PO Box 17370

St. Paul, MN 55117

Expiration Date: XX/XX/XXXX

Signature: _____

Pursuant to M.S. 5B.05, "When a program participant presents the address designated by the secretary of state to any person, that address must be accepted as the address of the program participant."

You may not question the program participant about any circumstances of her or his participation in the program.

If you have questions or need more information regarding Safe at Home contact:

651-201-1399

1-866-723-3035 (toll free)

safe.athome@state.mn.us

www.sos.state.mn.us

TTY: 1-800-627-3529 or 711