

| | | |
|---|---|--------|
| DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION | FOOD SUPPLEMENT PROGRAM MANUAL | |
| VERIFICATION | Section 408 | Page 1 |

408.1 Purpose

This section provides the general policy on verification. It describes the kinds of information that must be verified at application, recertification and interim change. It also provides a definition of documentary evidence and collateral contacts, and details the household's and local department's responsibility in the verification process. It does not provide details regarding the verification of specific eligibility factors. This information is in the section on each specific eligibility factor.

408.2 Definition

Verification is the use of documentation or third party information to establish the accuracy of statements on the application. The local department will provide the household with written notice of the required verifications. The household has the primary responsibility for providing written documentation to support statements on the application. The household is also responsible for resolving any questionable information. The local department is responsible for helping the household secure verification and for using online verification resources, such as SDX and SAVE.

408.3 Verification at Application, Normal Processing

- A. Verify the following information prior to certification for households initially applying. Do not verify the factors listed in section 408.12 for categorically eligible households.
 1. Identity;
 2. Gross, non-excludable income;
 3. Social Security Number (verify once, SS card is not necessary);
 4. Medical expenses, including reimbursed amounts, only if the household claims allowable medical expenses over \$35 per month for an elderly or disabled member. This is considered an optional verification because obtaining the information does not affect the eligibility decision. However, if the household claims medical expenses one must verify the expenses to allow the deduction;
 5. Utility expenses, if:
 - (a) Entitlement to a utility standard is questionable
 - (b) If not entitled to claim a utility standard but has a single utility expense
 - (c) The household wishes to claim utility expenses for an unoccupied home. Note: The agency must verify the actual utilities for an unoccupied home and cannot use the utility allowances.

| | | |
|---|---|--------|
| DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION | FOOD SUPPLEMENT PROGRAM MANUAL | |
| VERIFICATION | Section 408 | Page 2 |

408.3 Verification at Application, Normal Processing (continued)

6. Amount of non-excluded resources, (do not request verification of resources for categorically eligible cases);
7. Residency (except in the case of homelessness, households newly arrived in the project area and some migrant farm workers);

NOTE: It is not intended that the verification of residency and identity in the regular application process result in a change in procedure or need for additional verification. Documents used to verify other factors of eligibility normally suffice to confirm residency and identity. Please see 408.3 B and C below for more information on verification of residency.

8. Household composition, if questionable;
 9. Immigration status for non-citizen applicants if questionable (for further clarification see Sec 120.2 of this manual, Immigrants);
 10. Legal obligation to make child support payments to or for an individual living outside the household and the amount of the actual payment;
 11. Disability, if the determination of disability affects the household's eligibility or benefit level (e.g. eligibility for uncapped shelter, medical expenses, student status or exemption from work registration);
 12. Shelter costs for a homeless households claiming shelter expenses that would result in a shelter deduction in excess of the \$143 allowance;
 13. Hours worked by an ABAWD and countable months in another state, if applicable.
- B. Verification of residency may be impossible to obtain in certain situations. Some households, such as migrant farm workers and the homeless, may find it impossible to provide documentary proof of residency.
- C. If it proves impossible to verify residency, certify the household for Food Supplement Program (FSP) benefits if otherwise eligible. In addition, no specific document is required to verify residency.

408.4 Verification at Application, Expedited Processing

Identity is the only mandatory verification when processing an application for expedited service. In these instances, the local department must:

- A. Verify the identity of the applicant in all cases through a collateral contact or other readily available documentary evidence.

| | | |
|---|---|--------|
| DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION | FOOD SUPPLEMENT PROGRAM MANUAL | |
| VERIFICATION | Section 408 | Page 3 |

408.4 Verification at Application, Expedited Processing (continued)

- B. Make reasonable efforts to verify the household's residency, income, liquid resources and other factors of eligibility within the expedited processing time frames.
- C. Do not delay certification beyond the expedited processing timeframes if eligibility criteria other than identity cannot be verified.

408.5 Verification of Questionable Information

- A. Local departments must verify all other factors of eligibility if they are questionable and affect the household's eligibility or benefit level.
- B. To be considered questionable, the information on the application must be:
 1. Inconsistent with statements made by the applicant; or
 2. Inconsistent with other information on the application or on previous applications; or
 3. Inconsistent with information received by the local department.
- C. Evaluate each household on the basis of its individual circumstances when determining if information is questionable.

EXAMPLES:

A household's report of expenses that exceed its income may be grounds for the local department's request for further verification. This circumstance, in itself, is not grounds for a denial of benefits. In this instance, explore with the household how it meets its expenses. Request further verification based on the household's response to these questions.

A roomer or boarder has the same last name as someone in the household.

Suddenly there is an absence of medical bills for a household member that has had continuous medical expenses for several years. This could apply to other bills.

Contradictory statements appear on the application.

408.6 Verification of an Expense or Verification of a Questionable Expense

- A. If obtaining required verification of an expense, including medical expenses, will delay the household's certification, advise the household that its eligibility and FSP benefit level may be determined without providing a deduction for the unverified expense.

| | | |
|---|---|--------|
| DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION | FOOD SUPPLEMENT PROGRAM MANUAL | |
| VERIFICATION | Section 408 | Page 4 |

408.6 Verification of an Expense or Verification of a Questionable Expense (continued)

- B. Compute shelter costs without including the unverified elements. Use the Standard or Limited Utility Allowance if the household is entitled to claim it.
- C. Determine the household's eligibility and FSP benefit level without providing a deduction for an unverified expense if the expense cannot be verified.
- D. If the household subsequently provides the missing verification, redetermine the household's benefits in accordance with the timeliness standards in Section 420, Reporting Changes of this manual.
- E. The household is entitled to the restoration of FSP benefits (retroactive to the month of application) only if the expense could not be verified within the 30-day processing standard because the local department failed to allow the household sufficient time (see Section 406, Normal Processing) to verify the expense.
- F. Process the household's application as provided in Section 406 if the household is ineligible because the expense is disallowed.

408.7 Verification at Recertification

Re-verify the following information at recertification:

- A. Gross non-exempt income if the source has changed or the amount has changed by more than \$50;
- B. Previously unreported and total recurring medical expenses which have changed by more than \$50
- C. Actual utility expenses which have changed by more than \$50;
- D. Newly obtained Social Security Number (changes in Social Security Numbers previously verified must be re-verified);
- E. Changes in legal obligation to pay child support, the obligated amount and the actual amount paid to a non-household member;
- F. Changes in immigrant status;
- G. Work hours for ABAWDS;
- H. Changes in residency; and

| | | |
|---|---|--------|
| DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION | FOOD SUPPLEMENT PROGRAM MANUAL | |
| VERIFICATION | Section 408 | Page 5 |

408.7 Verification at Recertification (continued)

- I. Changes in household composition, if questionable.

NOTE: Re-verify other information, including resources for non-categorically eligible households, if it is incomplete, inaccurate, inconsistent or outdated.

408.8 Verification at Interim Change

The same verification requirements that apply at initial application apply to changes reported during the certification period with the following exceptions:

- A. Do not verify changes in earned income if the source has not changed and the amount has changed by \$50 or less, unless the information is incomplete, inaccurate, inconsistent or outdated.
- B. Do not verify changes in utility expenses (households with one utility) if the source has not changed or the amount has changed by \$50 or less, unless the information is incomplete, inaccurate, inconsistent or outdated.
- C. Do not verify changes in medical expenses if the source has not changed or the amount has changed by \$50 or less, unless the information is incomplete, inaccurate, inconsistent or outdated.
- D. Verification is not required until the next recertification if a change results in a decrease in FSP benefits.

408.9 Types of Verifications

408.91 Documentary Evidence

- A. Documentary evidence consists of a written confirmation of a household's circumstances. Some examples of documentary evidence include the following:
 - 1. Wage stubs
 - 2. Copies of checks
 - 3. Award letters
 - 4. Utility bills
 - 5. Bank statements
 - 6. Letters from employers, landlords, etc.
 - 7. Immigration and Naturalization documents and SAVE
- B. Scan all documents into ECMS and return originals to the customer or destroy copies that the customer does not want.

| | | |
|---|-----------------------------------|--------|
| DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION | FOOD SUPPLEMENT PROGRAM MANUAL | |
| VERIFICATION | Section 408 | Page 6 |

408.91 Documentary Evidence (continued)

- C. The **household is responsible** for providing documentary evidence to support its statements. Households may supply documentary evidence in person, through the mail, by facsimile (fax), email, myDHR or other electronic means or through an authorized representative. The local department **cannot require** the household to present the documentation in person.
- D. The case manager must accept any reasonable documentary evidence as long as it provides adequate verification of the statements provided by the household. Local departments must attempt to assist the household with obtaining documentary evidence if it is difficult or impossible for the household to obtain them on its own.
- E. The case manager must be primarily concerned with whether the verification proves the statements on the application. Simply because a household is in an error-prone situation does not mean there is insufficient verification to prove household member statements.

Reminder: Do not close or deny a FSP benefit case because the household does not provide required verification of expenses such as dependent care, medical or shelter costs. Certify the household without the deduction.

408.92 Collateral Contact

- A. A collateral contact is a verbal confirmation of a household's circumstances. The collateral contact may be made in person or by telephone. Some examples of acceptable collateral contacts include talking with the following:
 - 1. Employers
 - 2. Landlords
 - 3. Social service agencies
 - 4. Neighbors of the household
- B. Substitute a collateral contact or home visit when unable to obtain documentary evidence of required verification.
 - 1. Home visits **must be scheduled in advance**; and
 - 2. **May be used only** when there is not enough documentary evidence to make a firm determination of eligibility or benefit level.
- C. The household is responsible for providing the name of the collateral contact. It may request the local department's assistance in designating the collateral contact.

| | | |
|---|---|--------|
| DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION | FOOD SUPPLEMENT PROGRAM MANUAL | |
| VERIFICATION | Section 408 | Page 7 |

408.92 Collateral Contact (continued)

- D. The case manager must remember to have the customer sign **Consent for the Release of Information before requesting verification from a collateral contact.**
- E. The local department is not required to use the collateral contact named by the household if it cannot be expected to provide accurate third party verification. When this occurs, the local department must request the household to name another collateral contact. The local department is responsible for obtaining verification from acceptable collateral contacts.

**Note: Disclose only the information (regarding the customer) that is necessary to obtain the required verification.
Do not disclose information the household has supplied.
Do not disclose that the household has applied for FSP benefits.
Do not suggest the household has done anything wrong.**

408.10 Discrepancies

When information from another source contradicts statements made by the household, local departments must give households a reasonable opportunity to resolve discrepancies before determining eligibility.

408.11 Narration

Case records must be narrated to support eligibility, ineligibility, and FSP benefit level determination. Narration must be in sufficient detail to allow a supervisor or reviewer to determine the reasonableness and accuracy of the determination. The narration must also include any additional information regarding the applicant/recipient that is pertinent to the eligibility process.

Some examples of narration include the following:

- A. The reason for the withdrawal of an application, if any was stated by the household, and the withdrawal was confirmed;
- B. Details regarding refusal to cooperate;
- C. The reason information is considered questionable and the verification that was used to resolve the questionable situation;
- D. The reason an alternative source of verification (a collateral contact or home visit) was necessary;

| | | |
|---|---|--------|
| DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION | FOOD SUPPLEMENT PROGRAM MANUAL | |
| VERIFICATION | Section 408 | Page 8 |

408.11 Narration (continued)

- E. The reason a collateral contact was rejected and an alternate requested;
- F. A statement that the decision to average fluctuating income was made by the household;
- G. A statement that the decision to use a utility allowance or actual costs was made by the household;
- H. A statement that income and/or resources were not verified because the household stated that it did not have any, and there was no reason to question its statement.

408.12 Public Assistance (PA) and Supplemental Security Income (SSI) Households

- A. Local departments will accept, without further verification, eligibility factors for the following when a household is categorically eligible as defined in Section 115, Categorical Eligibility, of this manual:
 - 1. Resources;
 - 2. Gross and net income limits;
 - 3. Social security number information;
 - 4. Sponsored alien information; and
 - 5. Residency.
- B. If any of the following factors are questionable, verify that the household:
 - 1. Contains only members that are PA or SSI recipients;
 - 2. Meets the household definition defined in Section 100 of this manual, household composition;
 - 3. Includes all persons who purchase and prepare food together, regardless of whether they are separate units for PA or SSI purposes; and
 - 4. Includes no persons who are disqualified as described in Section 115 of this manual.
- C. Verify factors of eligibility that are not verified for PA or SSI purposes if required in this section.

NOTE: Always check ECMS for documentation of factors of eligibility.