

May 10, 2024

GENERAL LETTER NO. 7-B-76

- ISSUED BY: Bureau of Financial, Food, and Work Supports Division of Community Access
- SUBJECT: Employees' Manual, Title 7, Chapter B, **SNAP Application Processing**, 5, 11, 14, 16, 17, 24, 25, revised.

Summary

This chapter is revised to

- Relay processing standards for different case types in the same place.
- Clarify agency action on application withdrawn applications.
- Reference SNAP duplicate assistance checks.
- Update guidance on emergency services.

Effective Date

Upon receipt.

Material Superseded

Remove the following pages from Employees' Manual, Title 7, Chapter B, and destroy them:

- Page Date
- 5 September 23, 2022
- 11 January 26, 2024
- 14 September 23, 2022
- 16 January 26, 2024
- 17 September 23, 2022
- 24 January 26, 2024
- 25 September 23, 2022

Additional Information

Refer questions about this general letter to your area income maintenance administrator.

The following sections explain procedures for:

- Handling a request for an application
- Determining the date of application
- Notifying and screening for emergency service
- Withdrawal of an application

Handling a Request for an Application

Legal reference: 7 CFR 273.2(c)(3) and (5)

Policy: Application forms must be available to anyone who wants one.

Procedure: Give an application to anyone who asks for one. Give form RC-0023 or RC-0023(S), *Things You Need to Give Us for SNAP*, with each application form.

Tell everyone who asks about applying for SNAP that:

- The application can be submitted on line, by mail or fax, or in person at the local HHS office. Offer to give or send out an application form that same day.
- An application should be submitted right away. The first month's benefits start from the date the
 office gets the application.
- Just the applicant's name, address, and signature blanks need be completed to turn in the application. Items left blank will need to be filled in later.
- A member of the household or authorized representative must be interviewed. Put a phone number on the application where the household can be reached for a telephone interview.
- Emergency service may be available. Go to <u>Determining Eligibility for Emergency Service</u> for details.
- After turning in an application an eligible household will get benefits within:
 - 7 days if eligible for emergency service.
 - 30 days if not eligible for emergency service.

- Electronic Benefit Transfer (EBT) and what is not allowable for purchase with EBT. See <u>7-A</u>, <u>Participant Use of Benefits</u>.
- How long it takes to process the application.
- Prospective budgeting.
- Reporting requirements and tell the household they will receive form 470-2960 or 470-2960(S), *Reporting SNAP Changes*, with the gross income limit that applies to the household.

For face-to-face interviews, you must also document whether it was the decision of the applicant or worker to conduct the interview in person.

Document the type of interview that is conducted on the Automated Benefit Calculation (ABC) system TD02 screen. See 14-B(5) for instructions.

Provide the client a copy of the pamphlet, Comm. 51, *Information Practices*, at time of application or interview and whenever the clients request it.

Voter Registration Procedures During the Interview

Legal reference: 721 IAC Chapter 23

Policy: The Department is responsible for helping clients fill out *Voter Registration* forms and for mailing the forms to the county election office. All applications, RREDs, and RFIs include the website where clients can complete the *Voter Registration* form online and to contact their local office for more information about registering to vote.

Procedure: See <u>6-Appendix</u> for a copy of the *Voter Registration* form and office procedure instructions regarding processing the forms.

Failure to Attend the Interview

Legal reference: 7 CFR 273.2(e)(3)

Policy: If the household fails to attend the scheduled interview, notify the household that it missed its scheduled interview and that it is responsible for rescheduling.

Procedure: Give the household five additional minutes beyond the time scheduled regardless if you are calling the household or they are required to call you.

If the household fails to attend a scheduled interview, send the *Notice of Missed Interview (NOMI)* (522) immediately and deny the application on the 30th day following the date of application. When the 30th day falls on a weekend or holiday, make system entries on the next working day. See <u>Denying an Initial Application</u> for additional information.

If the household contacts you in the 30-day application-processing period to pursue the application, you must schedule a second interview.

Verification

Legal reference: 7 CFR 273.2(f)(4), (5), and (6)

Verification is third-party information or documentation that confirms the accuracy of statements on the application. There are four sources of verification:

- Documentary evidence
- Collateral contacts
- Home visits
- The state Income and Eligibility Verification System (IEVS)

Households must verify certain eligibility factors to get SNAP. More specific verification information and requirements are in <u>7-C</u>, <u>7-D</u>, <u>7-E</u>, <u>7-F</u>, and <u>7-G</u>. The household has the primary responsibility to explain its situation and provide documentary evidence to support its statements on the application. The household must also resolve any questionable information.

Document everything that supports the decision about the household's eligibility and benefit level. Your documentation needs to contain enough detail so that anyone reading it can understand what was decided and why. Documentation helps to support a decision and may point out inconsistencies in information given by the household.

Accept any reasonable documentary evidence from the household. Information from another source may disagree with statements made by the household. Give the household 10 days to resolve any discrepancy before determining eligibility or the benefit level.

When you request additional information from the household, document the date of the request, what information was requested, and the due date given to the household. You cannot cancel or deny a household for failure to provide information if the request is not documented in the case record, or if the household was not given 10 full days to provide verification.

Help the household get verification if the household asks for help. Do not deny or cancel the household when a person outside the household fails to provide information. For this policy, the following people are considered to be inside the household:

- An ineligible alien
- An ineligible student
- A SSI recipient in a cash-out state
- A person disqualified for intentional program violation
- A person disqualified for refusing to comply with a work requirement
- A person disqualified for failing to provide a social security number
- A person disqualified for failing to respond to a NAC match at application, RRED, or when adding a household member
- A person who is a probation or parole violator, or a fleeing felon
- A person who is ineligible for failing to meet the work requirements for people aged 18 to 50

State Income and Eligibility Verification System (IEVS)

Legal reference: 7 CFR 273.2(f)(7), 7 CFR 273.2(f)(9), 441 IAC 65.51

Through the State Income and Eligibility Verification System, state and federal agencies exchange computerized information. HHS exchanges information with the Social Security Administration, the Internal Revenue Service, and the Iowa Department of Employment Services. SSI is verified through the State Data Exchange (SDX) or the Wire Third-Party Query System (WTPY). See 14-G, <u>Exchange of Data With Other Agencies</u>, for further information on IEVS.

IEVS Information Considered Verified

Legal reference: 7 CFR 273.2(f)(9)(iii)

Social security benefits and unemployment insurance benefits are automatically verified when reported through IEVS. Further verification is not needed.

If other verified information about a person's Social Security, SSI, or unemployment benefits differs from IEVS data, resolve any discrepancy before eligibility or benefit levels are determined. When IEVS information does not affect eligibility or benefits, make a notation on the report and file it in the case record.

If you get IEVS information during the application process, use it to determine eligibility and benefits. Make a decision without IEVS information if waiting for it will cause you to go past the processing time limits.

IEVS Information Not Considered Verified

Legal reference: 7 CFR 273.2(f)(9)(iv)

The following information is available through IEVS, but is **not** automatically verified and is not to be used to determine eligibility and benefits:

- Unearned and earned income information from the Internal Revenue Service.
- Wage and pension information from Social Security Administration, the Iowa Department of Workforce Development, and any source in IEVS that is questionable.

These are indicators of income. Request verification of this information if it might affect eligibility or benefits and is not already verified.

Mandatory Verification at Application

Legal reference: 7 CFR 273.2(f)(1) and (f)(8)(i)(A), 441 IAC 65.19(14), 65.22(1), 65.26(3)

Verify the following at application if not previously verified or if previously verified, but now questionable. (See <u>7-B</u>, <u>Questionable Information</u>.)

To verify:	Refer to:
Alien status	7-I, Alien Status Verification Requirements
Deductible expenses	7-E, Deduction Verification Requirements
Disability	7-B, Verifying Disability
Gross nonexempt income	7-E, Income Verification Requirements
Identity	7-B. Verifying Identity
Residency	7-C, Residency
SNAP duplicate assistance check	7-C, Duplicate Assistance
Social security number	7-C, Verifying a Social Security Number

The following sections give instructions on:

- Verifying identity
- Verifying disability
- Questionable information

Verifying Identity

Legal reference: 7 CFR 273.2(f)(1)(vii)

Verify the identity of the person applying for SNAP. When an authorized representative applies for the household, verify the identities of both the authorized representative and the head of the household.

If identity has previously been verified, verify it again only if it is questionable.

Accept any document that reasonably verifies identity. Some of the most common forms of identity verification include:

- Driver's license.
- Work or school ID.
- Social Security card.
- ID for health benefits.
- Voter registration card.
- Wage stubs.
- Birth certificate.
- Collateral contacts.

Delays Caused by the Household

Legal reference: 7 CFR 273.2(h)(2), 441 IAC 65.6(1)

A delay in processing is the fault of the household if the household failed to complete the application process but you took all required action. See <u>Delays Caused by the County Office</u> for required action the county office must take.

The delay is the fault of the household when a household fails to appear for its interview, asks for another interview, and the rescheduled interview:

- Is scheduled after the 20th day but by the 30th day following the date the application was filed, but the household either does not appear or does appear but does not bring verification; or
- Is scheduled after the 30th day following the date the application was filed at the household's request.

If the household takes the required action after the thirtieth day but before the sixtieth day following the date of application and is found:

- Eligible, prorate benefits from the date that the household took the action. The household is not eligible for any benefits for the first 30-day period. For example, if the household applies on May 1 but does not give the necessary verification until June 15, prorate benefits from June 15.
- Ineligible, send a *Notice of Decision* denying the application.

If the household does not do what it is supposed to do by the sixtieth day, deny the application on the sixtieth day. If the sixtieth day falls on a weekend or holiday, make computer entries on the next working day. Do not send a second notice when a notice of pending status was sent.

Delays Caused by the County Office

Legal reference: 7 CFR 273.2(h)(3)

The delay is the fault of the county office if the required actions were not taken, such as:

- Offering the household help in filling out the application.
- Helping the household obtain verification, if the household requests help.
- Allowing the household at least 10 days from the request to provide missing verification.
- Rescheduling a requested second interview within 30 days following the application date if the household failed to appear for the interview.

If the household is found eligible, issue benefits back to the date of application.

If household is found ineligible, send a *Notice of Decision* even when a notice of pending status was sent.

Delays Beyond 60 Days

Legal reference: 7 CFR 273.2(h)(4), 441 IAC 65.6(2) and 65.5(3)

When you cannot determine eligibility within 60 days, decide who caused the delay for each 30day period.

- If the household is at fault for the delays in both the first and second 30-day periods, deny the application. The household must file a new application if it wants SNAP. Do not send a Notice of Decision if the household was sent a notice of pending status.
- If the local office is at fault for the delays in both the first and second 30-day periods and eligibility cannot be determined, send a *Notice of Decision* to deny the application, even when a notice of pending status was sent. Tell the household to file a new application. Also inform the household that it may be entitled to lost benefits back to the date of initial application.
- If the local office is at fault for delays in both the first and second 30-day periods, and eligibility can be determined, process the application. If the household is eligible, approve benefits back to the date of application.

Determine the household's eligibility and benefits for the months following the 60-day period, until you reach a month of ineligibility or you cannot determine eligibility. Ask the household to file a new application when you reach a month for which you cannot determine eligibility or benefits.

If the household is at fault for the delay in the first 30 days, and the local office is at fault for the delay in the second 30 days, process the application. If the household is ineligible, deny the application and send a Notice of Decision, even if a notice of pending status was sent.

If the household is eligible, approve benefits back to the date the household did what it needed to do. Determine the household's eligibility and benefits for the months following the 60-day period until you reach a month for which you determine the household is ineligible or you cannot determine eligibility.

Ask the household to file a new application when you reach a month for which you cannot determine eligibility or benefits.

If the local office is at fault for the delay in completing the application process in the first 30 days, and the household is at fault for the delay in the second 30 days, deny the application. Send a *Notice of Decision* even if a notice of pending status was sent. The household must file a new application if it wants SNAP.