

May 10, 2024

**GENERAL LETTER NO. 7-G-74**

ISSUED BY: Bureau of Financial, Food, and Work Supports  
Division of Community Access

SUBJECT: Employees' Manual, Title 7, Chapter G, ***SNAP Case Maintenance***, Contents 1 and 2, 3, 4, 6, 23 and 24, 30 and 31, 32, 37, revised.

**Summary**

This chapter is revised to

- Include information on acting on matches from the National Accuracy Clearinghouse (NAC)
- Correct the link to Handling Future Changes Reported at Application in 7-B

**Effective Date**

Upon receipt.

**Material Superseded**

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

<u>Page</u>	<u>Date</u>
Contents 1 and 2	September 23, 2022
3	September 23, 2022
4	February 24, 2023
6, 23 and 24	September 23, 2022
30 and 31	November 11, 2022
32, 37	September 23, 2022

**Additional Information**

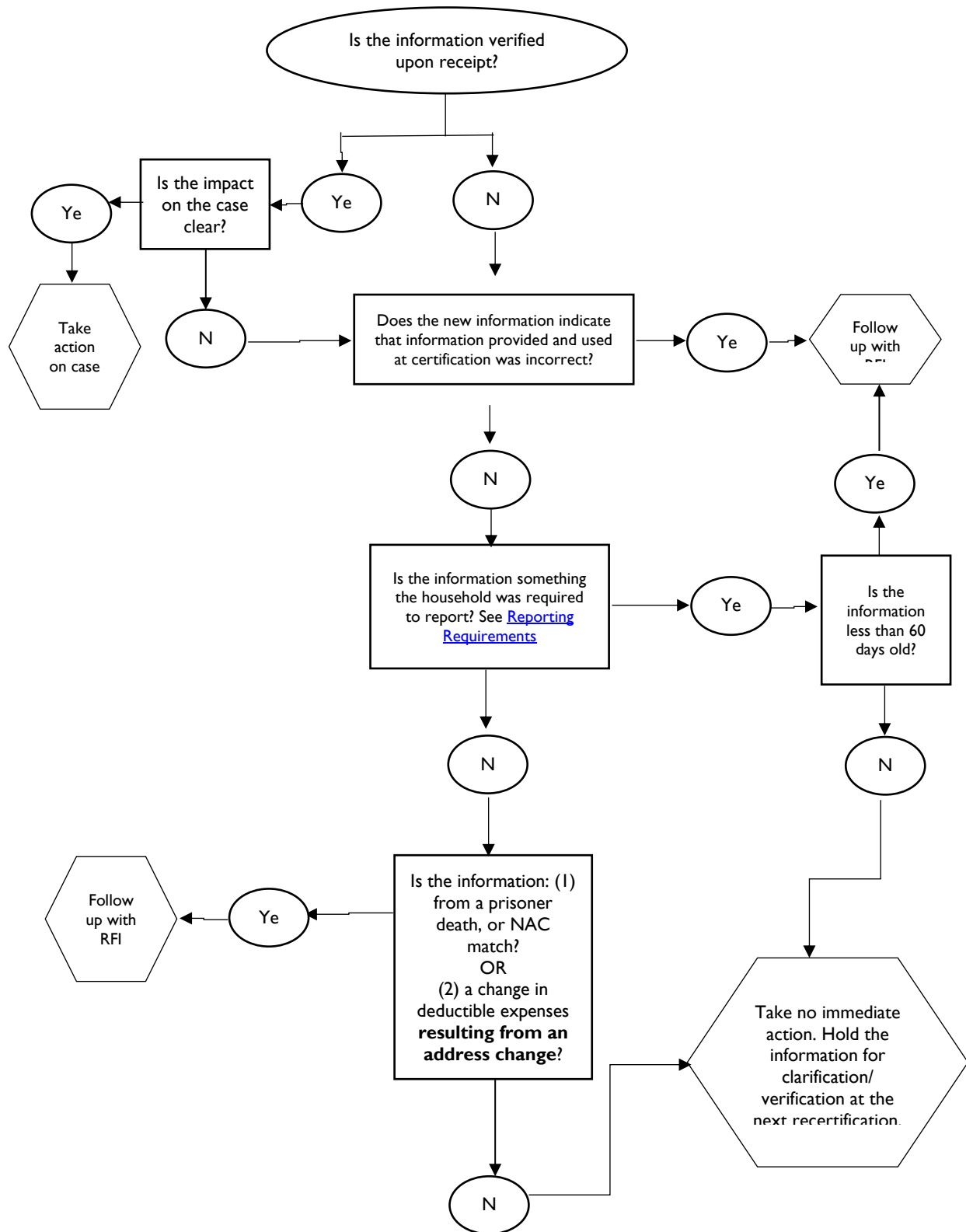
Refer questions about this general letter to your area income maintenance administrator.

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	<u>Page</u>
<b>Overview .....</b>	<b>I</b>
<b>Reporting Requirements .....</b>	<b>I</b>
Household Fails to Report a Required Change.....	2
<b>Action on Changes Reported During the Certification Period .....</b>	<b>2</b>
Changes Requiring Action During the Certification Period.....	4
Changes Held Until Recertification .....	7
Multiple Changes.....	10
Verifying Changes.....	11
Third-Party Fails to Provide Verification .....	12
When a Change Will Increase Benefits.....	12
Issuing Supplemental Allotments .....	13
When a Change Will Reduce or End Benefits.....	14
Reinstatement .....	15
Reinstatement After the Effective Date of Cancellation (Grace Period).....	16
Continuing Benefits Under Appeal .....	17
New Reason to Keep a Case Canceled or Benefits Reduced .....	17
<b>Common Changes in Household Circumstances.....</b>	<b>19</b>
Household Moves .....	19
Household’s Mail is Returned.....	19
Adding a Member.....	19
Removing a Member .....	23
Children Moving Between Homes.....	23
Household Reports New Self-Employment .....	24
An ABAWD Starts Meeting the Work Requirement.....	24
A Member Becomes Ineligible .....	25
A Member Regains Eligibility .....	26
FIP Is Terminated .....	26
Penalty for Means-Tested Program Sanction.....	27
Penalty for a FIP Sanction.....	27
Penalty When Sanctioned Household Applies for FIP or SNAP .....	28
Ending the 10% Penalty.....	29
Acting on IEVS and Other Automated Reports.....	30
Acting on matches from the National Accuracy Clearinghouse (NAC).....	30
Acting on the Prisoner Match Report.....	31
Acting on the SSA Deceased Individual Match Report.....	31
Treatment of Remaining Household Members When Acting on Prisoner or Death Matches.....	32
Failure to Cooperate With Quality Control .....	32
<b>Recertification .....</b>	<b>33</b>
Timely or Untimely Filing a RRED.....	34
Interview .....	34
Scheduling Interviews.....	35
Conducting the Interview.....	36
Explaining Simplified Reporting.....	36

---

	<u>Page</u>
Failure to Attend the Interview .....	36
Clarifying and Verifying Information.....	37
Determining Eligibility and Benefits .....	40
Timely Processing a RRED .....	40
Delays in Processing a RRED .....	40
RRED Filed Before the End of the Certification Period.....	41
RRED Filed After the End of the Certification Period.....	42
Case Documentation .....	43



### **Changes Requiring Action During the Certification Period**

**Policy:** Generally speaking, the following types of changes require immediate action:

- Changes for which the information which is verified upon receipt and the impact is clear
- Changes which indicate that incorrect information was reported and used at the time of certification
- Changes that were required to be reported, and the information is less than 60 days old
- Changes based on information received from a prisoner, death or National Accuracy Clearinghouse (NAC) match
- Changes in deductible expenses resulting from an address change. Verification of all other expenses during the certification period is voluntary.

**Procedure:** If you receive a report of one of these types of changes, follow policies and timeframes for increasing or decreasing benefits. If verification is requested and not provided, the case must be canceled. Exception: If the household reports a change in shelter and/or utility expenses resulting from an address change and the household fails to provide requested verification of the expense, do not allow the deduction and do not cancel the case.

Other than changes resulting from a new address, if the household reports a change in an expense that has already been verified, do not request verification of the change. If the client does not voluntarily provide verification of the change, leave the previously verified deduction amount on the case. Do not change the deduction to the newly reported amount because the change was not verified. This will need to be verified at the next recertification.

If the reported change is something we are able to verify through data matches, you must attempt to verify the change. Depending on how quickly the change is reported, the data source may or may not be able to provide the verification necessary. If the change cannot be verified at the time of report, it is not considered “verified upon receipt” and you must then determine if it meets any other criteria which requires immediate action.

If the reported change is the result of an unverified prisoner or deceased matching system, or from NAC, and you need to send an RFI, you must mark the appropriate section on the form so that the required language for these types of changes is included.

The client’s written or verbal report of their gambling or lottery winning amount is considered verified information. It is only necessary to request additional proof of the gambling or lottery winning amount if the client’s report is questionable. See I4-B(5) for instructions on how to cancel a household who becomes ineligible due to lottery or gambling winnings.

NOTE: A data source report of lottery/gambling winnings is not considered verified. If, in an attempt to verify the information from the data source, you are able to speak with the client by phone or the client provides a written statement of their lottery or gambling winning amount, consider the client’s statement as verified information unless questionable.

7. Household C is receiving SNAP. In April we receive a prisoner match showing that a member is now incarcerated. You must follow up to determine whether the member is still incarcerated. See [Acting on the Prisoner Match Report](#) for how to proceed.
8. Household D is receiving SNAP. In October they report that Mr. D is in jail and is expected to be there for at least two months. Since the household reported this (it didn't come from a prisoner match), it is considered verified. Remove Mr. D from benefits, allowing for timely notice.
9. Household F is receiving SNAP. At recertification, they reported rent of \$550 and the Big SUA. Two months later they report a move, and that they now pay \$500 rent and are responsible for the same utilities at the new address.

Change the address and send an RFI to verify shelter and utility expenses at the new address. Even though they claim to be paying the same utilities, the address had changed. Do not remove the deductions on the system at the time the RFI is sent. If they do not return verification, then remove the shelter and utility expenses, as neither has been verified for the new address.

NOTE: If the address had not changed, but they were reporting that the previously verified rent at the same address had decreased or increased, this change would be held until recertification unless the household voluntarily verifies the change before then.

10. Household G is receiving SNAP. After certification, the household calls to report that they won \$8,000.00 at the casino. This report from the household is not questionable and is considered verified information. Follow the instructions in 14(B)5 to take action to close the case.
11. In October, Hattie is certified with earnings of \$1000 per month from Todd's Treat Shop. On December 3, she provides a letter of termination from Todd's dated November 30 showing that her last day was November 28. It does not show her final pay date or pay amount.  
  
In looking at the pay information (frequency and schedule) we have on file, we can determine that her last check will be received on December 8. Even though she didn't provide a copy of her last check, we have verification that the job ended and can determine she will not receive pay beyond the month of December. This is a verified report of a job ending, and income should be removed starting with January benefits.
12. Charlotte receives SNAP benefits. At certification, she provides verification of her \$400 monthly rent amount and of her cell phone expense. After certification, she reports a move and reports she is now responsible to pay \$500 monthly rent and she is still responsible to pay for her cell phone (the same phone expense verified at certification).  
  
An RFI is sent to verify her new rent amount as a result of the move. Charlotte does not provide proof of her new rent amount and the shelter deduction is removed. Her cell phone expense is not removed because it did not change as a result of her move; the expense was verified at certification and is not tied to her previous address.
13. Jefferson is receiving SNAP. During the certification period, a NAC match is received showing they receive SNAP benefits in another state. You must follow up to determine if they are still receiving SNAP benefits in the other state. See [Acting on Matches from the National Accuracy Clearinghouse \(NAC\)](#) for how to proceed.

## **Removing a Member**

Legal reference: 7 CFR 273.12(c)

**Policy:** Households are not required to report if a member leaves their household. However, if you get verified information that someone has left, you must remove that member, allowing for timely notice.

Trent is receiving SNAP for himself and his son Xavier. At time of certification, he reports that Xavier is only with him one night per week and every other weekend.

However, since Xavier's mom does not receive SNAP, he is included on the case. If she later applies, she will be entitled to benefits for Xavier since he is there a majority of the time.

Xavier's mom applies for SNAP on April 3. She reports the same custody arrangement Trent previously reported. Since no further verification is necessary and the impact on the case is clear, Xavier is removed from Trent's SNAP effective May 1. He can then be added to his mom's benefits for that month.

## **Children Moving Between Homes**

Legal reference: 7 CFR 273.12(c)

**Policy:** When children move between homes, you **must** work with both households to make sure the children are on the appropriate case. Remember that court custody arrangements don't always reflect the true physical custody of the child.

**Procedure:** Any time you get conflicting information from the two households, work with both to determine the correct situation. In extreme situations where the households continue to give conflicting information, DIAL may need to be involved. No action should be taken on either case until information is verified.

- I. Ms. S and her son receive SNAP. Ms. S calls to report that her 14 year-old daughter Ava moved back into the home. Ava is currently receiving SNAP with her dad who lives 200 miles away, and there is no indication in his case file suggesting that Ava left her dad's home.

Explain to Ms. S that you can't add Ava unless you get verification Ava returned to the home. Do not send an RFI. Be sure to document dad's case with this information as well. Although he was not required to report a change, it will need to be addressed at the time of his recertification if not resolved before then.

Ms. S provides a copy of a court order placing Ava in the home, as well as school verification showing Ava was just enrolled in school in Ms. S's city. This is verification that Ava has moved. Ava should be removed from dad's case allowing for timely notice, and added to Ms. S's benefits the 1<sup>st</sup> of the next month. Both cases should be documented thoroughly.

2. Tammy receives SNAP and reports that her daughter Emma is back in the home. Emma is currently getting SNAP with her dad, but Tammy says Emma is with her the majority of the time. According to the notes in dad's file, physical custody is shared 50/50. Explain to Tammy that you can't add Emma unless she provides verification of the arrangement. Document both cases with this report of potential change.

Tammy does not provide verification during the certification period. At recertification, address the report and request further verification if necessary.

3. Cole is a SNAP recipient who reports his son Drew moved into his home. Drew is active with his mom who reported Drew lives with her the majority of the time. Cole is adamant that Drew now lives with him. You explain that you can't add Drew unless Cole provides verification of this. Document both cases with this potential change but do not take action.

Cole voluntarily provides statements from friends and family saying that Drew has moved in with him. Because Cole lives close to Drew's mom, Drew would attend school at the same place regardless of where he is living. Cole says the school records show mom's address because he lived with her when the school year started.

At this point, Cole has provided verification. However, since this is different than what mom reported, we need to follow up with her before removing Drew from her case. Work with both households to determine where Drew is truly spending the majority of his time. If you cannot resolve this on your own, refer the case to DIAL. Once DIAL verifies Drew's true living arrangements, take appropriate action on both cases.

### **Household Reports New Self-Employment**

**Policy:** If a household reports new self-employment, you must determine the countable amount of income, allowing either actual expenses or the standard deduction. Based on that amount, you either request verification or hold the reported change until recertification.

Active SNAP household calls to report that Quinn started a lawn care business. Last month, his lawn care income, in combination with their previously verified income, caused the household to exceed the reporting threshold.

Upon conversation with Quinn, you determine he has expenses such as gas and equipment. When allowing for expenses, either actual or the standard, the **countable** income from this new venture actually does not cause them to exceed the limit. Therefore, verification of the income is not requested. This reported change is held until recertification.

### **An ABAWD Starts Meeting the Work Requirement**

Legal reference: 7 CFR 273.24

**Policy:** An ABAWD who is not meeting work requirements is not required to report a change in ABAWD status. This would be treated as a change that is held until recertification.



**Acting on IEVS and Other Automated Reports**

Legal reference: 7 CFR 272.8, 273.2(f)(9)(iii), and 273.12; 44I IAC 65.51(234)

**Policy:** Act on alerts and reports from the Income and Eligibility Verification System (IEVS) or other automated sources.

**Procedure:** Check the case to see if the information has already been acted on. If not, see Chapters [14-E](#) and [14-G](#). These systems manual chapters:

- Provide instructions for handling specific reports, and
- Tell you if the information is considered verified upon receipt.

If the information is verified upon receipt, or is the result of a prisoner or death match, take action on the case. All other reports are held until recertification.

<b>If the information meets the criteria for action during the certification period and was:</b>	<b>Then:</b>
Previously acted on...	Document this in the case record.
Not previously acted on...	Take action within 30 days of receiving the alert or report (or later if a third party delays providing verification).

**Comment:** Establish a claim when:

- The household failed to report as required.
- You failed to act timely.

Note: SDX income alerts received through data sources which show changes in income are **not** death or prisoner matches. While they may indicate the income change is due to death or incarceration, this is not a death or prisoner match and may not be treated as such. No action on the indicated death is taken until a death match is received or the household reports a death.

See [7-H. Claims](#).

**Acting on matches from the National Accuracy Clearinghouse (NAC)**

Legal reference: 87 FR 59633

Policy: NAC matches are received two ways; through monthly batches and when another state initiates a look-up and matches with someone currently receiving SNAP in Iowa. These matches, received during the certification period, are not verified, and must be followed up on to ensure the matched individual(s) are not receiving SNAP benefits in more than one state.

Send an RFI to the household to obtain verification that their SNAP benefits closed in the other state. Use the appropriate “NAC Match” selection so the household understands this request is based on a data match we received.

The language on the RFI explains that if we don't hear from the household, the matched individual(s) will be removed from SNAP. If the household doesn't respond, cancel the household member(s) identified on the NAC match using the corresponding "you did not respond to the notice of match results" reason code (individual or case reason). Don't cancel the entire case unless the individual(s) from the NAC match is/are the only household member(s), in which case it would be appropriate for the case to be closed.

Note: NAC matches obtained during lookups for applications, recertifications, and when adding a new household member are treated differently than the NAC matches outlined in this section. See policies in [7-C](#), [7-I](#), and later in this chapter for more information on how to act on those NAC matches.

NAC information can only be used for preventing duplicate participation in SNAP. The information cannot be used for other purposes or programs.

### **Acting on the Prisoner Match Report**

Legal reference: Public Law 105-33; 7 CFR 273.1(b)(7); 7 CFR 272.13

**Policy:** The ABC system runs monthly matches to identify clients who are incarcerated. The match includes persons who are active or pending for SNAP.

These matches are not verified and must be followed up on to ensure that persons who are in jail or prison are not receiving SNAP to which they are not entitled. See [7-C, Residents of Institutions](#).

If the household or jail/prison confirms the household member is still incarcerated, remove them from SNAP. If you are not able to verify by reaching out to the household or jail/prison, an RFI must be sent to clarify the situation. Use the "Data Match – Prisoner" selection so the household understands this request is based on a data match we received.

The language on the RFI explains that if we do not hear from the household, we will assume the report is accurate. If the household doesn't respond, cancel the household member identified on the prisoner match using the "lives in an institution" reason code. Do not cancel the entire case unless the individual from the prisoner match is the only household member, in which case it would be appropriate for the case to be closed.

### **Acting on the SSA Deceased Individual Match Report**

Legal reference: 7 CFR 272.14

**Policy:** The ABC system runs monthly matches with SSA to identify clients who may be deceased. The match includes persons who are active or pending for SNAP.

These matches are not verified and must be followed up on to ensure that persons who are deceased are not receiving SNAP. Send an RFI using the "Data Match – Death" selection. The language instructs the household to contact us only if the information is incorrect. Therefore, if a response is not received, remove the person using the "because of death" reason code.

Do not cancel the entire case unless the individual from the death match is the only household member, in which case it would be appropriate for the case to be closed.

You may be able to verify the death from another source, such as a family member or obituary. If you are able to verify the death, you do not need to send an additional RFI. If using an obituary, you must make certain there is enough distinguishing information to verify it is the same person.

**Comment:** Unlike the SSA match which is not considered verified, the Iowa Department of Public Health Death match **is** considered verified upon receipt. If there are other automated death matches and you are not certain if they are considered verified upon receipt, contact SPIRS for assistance.

### **Treatment of Remaining Household Members When Acting on Prisoner or Death Matches**

When acting on a verified report of incarceration or death, if other household members are active on the case with the person who is canceled, they remain active on the case. This is true even if the only remaining household members are minor children. The whereabouts of the children would be addressed at the next recertification unless their situation is clarified when talking to the household regarding the match; an RFI cannot be sent during the certification period to determine where the children are living.

If, during the certification period or at the time the match is verified, someone reports the minor children are in their care, the caregiver can be added as an emergency authorized rep on the EBT card so that the remaining SNAP benefits can be used for the needs of the children; see instructions in [14-j](#) for adding a secondary cardholder.

If the new caregiver wants continued benefits with the children, gather the caretaker's information in order to add the caretaker to the child's SNAP benefits; see Acting on Changes Policies in this chapter for how to add a new household member. When adding the caretaker to the child's SNAP benefits, it is generally best to create a new case number with the caretaker as the case name. When doing so, copy all relevant information to the new case file and clearly document the situations.

In rare situations, it could be acceptable to simply change the case name to the new caretaker. If you have case-specific questions on how to handle a case like this, send your question to SPIRS.

### **Failure to Cooperate With Quality Control**

Legal reference: 7 CFR 273.2(d)(1) and (2)

**Policy:** Cancel the household's case if you are notified that the household failed to cooperate with the Quality Control Unit (QC).

See [7-C, Cooperation](#). See [Reinstatement](#) if the household cooperates before the effective date of cancellation.

**Comment:** Do not send a *Notice of Missed Interview* if you set up an interview but the household has not filed a RRED. You cannot take action if the household has not applied.

### **Clarifying and Verifying Information**

Legal reference: 7 CFR 273.14(b)(4), 44I IAC 65.22(1) and (2)

**Policy:** At the time of the recertification, you must clarify the household's situation, including any reported changes that happened during the prior certification for which action has not been taken. If the change is:

- still applicable, verification must be provided prior to approving continued benefits.
- no longer applicable, document the case with the clarified information and the reason additional verification is no longer needed.

If an unverified income source started and stopped during the prior certification period, verification is only required if:

- the final pay was received within the 30 days prior to the date the application or RRED is submitted, or
- you have reason to believe they may have exceeded the income limit and failed to report it, which could result in an overpayment.

Clearly document the case file with the details of each "held" change and the information you clarify at recertification. If lookups suggest verification is needed for a potential overpayment, send an RFI even if the last pay was more than 30 days ago.

If verification is needed to determine eligibility and benefits:

- Tell the household in writing what it must provide, and
- Give the household 10 days to provide the information.
  - The 10-day period starts the day after you give or mail the request.
  - If the 10th day is a nonworking day or a legal holiday, make the due date the next working day for which you have regular mail service.

If the household is due for an interview, a request for verification should not be sent prior to the interview. Use the interview to clarify as much information as possible and determine what verification is needed. A household cannot be denied for failure to provide information that is requested prior to the interview, because the household must be allowed 10 days from that date to provide information.

If processing a desk RRED, you must clarify any reported changes that were held during the prior certification period. You may attempt to clarify things with a phone call, and then send an RFI for verification. If you aren't able to clarify by telephone, verification must be requested for all changes that were held during the previous certification period. There is no requirement to attempt to reach the household by telephone. However, this may result in fewer requested verifications.