

May 9, 2025

GENERAL LETTER NO. 7-I-52

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

SUBJECT: Employees' Manual, Title 7, Chapter I, **SNAP Specific Households and Participants**, 3, 7, 11, 19-27, 30, 47, revised.

Summary

This chapter is revised to

- Require income maintenance workers contact SPIRS Helpdesk prior to taking action to cancel a person who appears to meet the criteria to be considered a fleeing felon
- Update "homeless" to include someone who will imminently lose their nighttime residence
- Add individuals who served as commissioned officers of the Public Health Service, Environmental Scientific Services Administration, or the National Oceanic and Atmospheric Administration to veteran status

Effective Date

Upon receipt.

Material Superseded

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

<u>Page</u>	<u>Date</u>
3, 7, 11, 19-27, 30	September 27, 2024
47	February 21, 2025

Additional Information

Refer questions about this general letter to your eligibility determinations manager.

“Immigration and Naturalization Service (INS)” means the former Immigration and Naturalization Service of the U.S. Department of Justice. The U.S. Citizenship and Immigration Services (USCIS) in the U.S. Department of Homeland Security has assumed the duties previously done by the INS.

“Immigration status” and **“alien status”** mean the same thing when used in SNAP policy discussion.

“Ineligible alien” means an alien who does not have an immigration status or meet some other criterion that allows the alien to participate in the SNAP program. The term “ineligible alien” includes legal aliens who do not meet criteria under SNAP policy as well as undocumented aliens.

“Lawfully residing” means lawfully present and maintaining a principal residence in the U.S.

“Legal permanent resident” means an alien admitted to the United States as a lawful permanent resident. Permanent residents are also commonly referred to as “immigrants.” However, the Immigration and Nationality Act (INA) broadly defines an immigrant as any alien in the United States, except one legally admitted under specific nonimmigrant categories.

Lawful permanent residents are legally accorded the privilege of residing permanently in the United States. They may be issued immigrant visas by the Department of State overseas or be adjusted to permanent resident from another immigrant status.

“Means-tested program” means a program that uses income and resource guidelines to determine eligibility. FIP, Medicaid, and SSI are examples of means-tested programs. Social Security and unemployment compensation are not means-tested programs.

“Naturalization” means the legal process through which a person who is not born a U.S. citizen becomes a citizen.

“Systematic Alien Verification for Entitlements (SAVE)” means the U.S. Citizenship and Immigration Services verification system HHS must use to verify the validity of documents provided by aliens applying for SNAP benefits.

“Sponsor” means a person who signed an *Affidavit of Support*, Form I-864, or similar agreement on behalf of an alien as a condition of the alien’s entry or admission into the United States as a permanent resident.

Establishing Qualifying Quarters

Legal reference: 42 United States Code, Chapter 7, Subchapter II, § 413

When an alien's eligibility depends on meeting the 40-quarter requirement, you must determine the number of quarters the person can be credited with. Each person can get up to four qualifying quarters of credit each calendar year based on the person's earnings.

The following chart gives the amount a person had to earn to get one credit for the years 1983 and later. (Contact SPIRS help desk for assistance in calculating qualifying quarters for years before 1983.)

Amount Needed to Earn a Qualifying Quarter			
Year	Earnings Needed to Get 1 Credit	Year	Earnings Needed to Get 1 Credit
1983	\$370	2005	\$920
1984	\$390	2006	\$970
1985	\$410	2007	\$1,000
1986	\$440	2008	\$1,050
1987	\$460	2009	\$1,090
1988	\$470	2010	\$1,120
1989	\$500	2011	\$1,120
1990	\$520	2012	\$1,130
1991	\$540	2013	\$1,160
1992	\$570	2014	\$1,200
1993	\$590	2015	\$1,220
1994	\$620	2016	\$1,260
1995	\$630	2017	\$1,300
1996	\$640	2018	\$1,320
1997	\$670	2019	\$1,360
1998	\$700	2020	\$1,410
1999	\$740	2021	\$1,470
2000	\$780	2022	\$1,510
2001	\$830	2023	\$1,640
2002	\$870	2024	\$1,730
2003	\$890	2025	\$1810
2004	\$900		

To calculate the number of quarters for a year, divide the person's total earnings for the year by the amount needed to get one credit. For earnings from employment, use the gross amount of earnings.

If the person is an eligible alien, see the policies under [Students](#), in this chapter to determine if the person is an eligible student before including the person as an eligible member of the SNAP household. If the person is an eligible alien but an ineligible student, consider the person an “ineligible student” when applying [Ineligible Household Members](#) policies.

Alien Status Verification Requirements

Legal reference: Section 121 of the Immigration Reform and Control Act of 1986 (Public Law 99-603); Public Laws 104-193 and 107-171

Before being certified or added to a certified household, all aliens must provide documentation that they have one of the “eligible alien” statuses as described under [Who Is an Eligible Alien](#). Aliens whose entry date determines eligibility must also provide verification of the entry or admission date from which their eligible status started.

Legal immigrants whose eligibility is dependent on having been lawfully residing in the United States on August 22, 1996, must prove they were lawfully present on that date and prove they meet the age requirement. Legal immigrants whose eligibility is dependent on disability must prove their legal status and prove that they are disabled according to the policy in [7-A, Disabled Member](#). See [Eligible Aliens](#).

When an alien provides immigration documentation, check the following documentation chart to see if the person is an eligible alien. The chart lists the types of documentation that can be used to verify alien status. It also lists additional verification that certain aliens must provide to prove they are eligible aliens for SNAP. After acceptable documentation has been provided, verify the persons eligibility through SAVE. See Using SAVE (Systematic Alien Verification for Entitlements)

EXCEPTION: American Indians who were born in Canada are not required to have or carry documentation of their status.

Status of Alien	Acceptable Documentation of Alien Status
<p>A non-Ukrainian individual who last habitually resided in Ukraine and received humanitarian parole who arrived in the U.S. between February 24, 2022 and September 30, 2024</p>	<p>Any one of the forms or stamps listed above for UHPs</p> <p>And</p> <p>Documentation of last habitual residence in Ukraine</p> <p>Acceptable documentation indicating last habitual residency in Ukraine includes an original Ukrainian government-issued document, such as a current driver's license or identification card.</p> <p>For documentation outside of these examples, contact the SPIRS helpdesk for assistance.</p> <p>Note: These individuals are eligible to receive SNAP without a waiting period and are immediately eligible for benefits as long as they meet all other SNAP financial and non-financial eligibility requirements. They are eligible as long as they remain in parole status or obtain another eligible immigration status. These individuals are exempt from sponsor deeming requirements</p> <p>These policies also apply to the following family members of these individuals, even if they are granted parole after September 30, 2024: spouses, children, parents, legal guardians, and primary caregivers of such individuals who were unaccompanied minors.</p>
<p>Veterans and active duty military personnel and their families</p>	<p>Active duty: Original or notarized copy of the current orders showing the person is on full-time duty in the U.S. Army, Navy, Air Force, Marine Corps, or Coast Guard, or a DD form 2 Military ID card (active-duty papers).</p> <p>Honorably discharged veteran: Original or notarized copy of form DD214 (discharge papers). NOTE: This verification is sufficient when the veteran or active-duty person is a U.S. citizen and the spouse or unmarried dependent children are aliens. It is also sufficient for the surviving spouse and unmarried dependent children of a deceased veteran.</p>

When a person claims an “eligible alien” status but does not have documentation, tell the person to contact the local USCIS office for help getting the documents. The person is considered an ineligible alien for SNAP benefits until the documentation is provided. See [Ineligible Aliens](#) for more information.

EXCEPTION: When processing an application, and the ten-day period for providing information ends after the thirtieth day following the date of application, see [Processing Applications for Households with Alien Members](#) earlier in this chapter.

Using SAVE (Systematic Alien Verification for Entitlements)

Legal reference: 7 CFR 272.11; 441 IAC 65.52(234); Immigration Reform and Control Act of 1986 (IRCA), Section 121, as amended by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA), and the Balanced Budget Act of 1997 (BBA). Iowa Code Section 239.6

Policy: HHS must verify the eligible status of all aliens applying for SNAP benefits by using SAVE. SAVE must be used to verify the alien status of every individual claiming to have an eligible alien status at every application and every review.

Procedure: HHS must have acceptable documentation of alien status on file prior to using SAVE to verify the person's current alien status. See [Alien Status Verification Requirements](#).

Obtain acceptable documentation of alien status from every person claiming to have an eligible alien status. When a person claims eligible alien status but does not have documentation, tell them to contact the local USCIS office for help getting the documents.

Do not approve benefits until acceptable immigration documentation is provided and SAVE has verified an eligible status.

Exceptions: When a household meets emergency service criteria, but the household is unable to provide acceptable documentation in time to meet emergency processing timelines, postpone immigration status verification and assume the alien is eligible. See [7-B, Emergency Service](#).

When an applicant has presented a document containing the individual's alien admission number or alien file number and SAVE instructs you to request secondary verification, do not delay, deny, reduce, or cancel the alien's eligibility for benefits while waiting for the USCIS to provide additional verification. For applications, assume the person is eligible and give benefits until USCIS verification is received.

If you find out later from USCIS that the person is an ineligible alien for SNAP purposes, cancel that person's SNAP benefits.

NOTE: Do not contact SAVE when the person claims to be undocumented or when the person claims to be a victim of trafficking. SAVE does not have information about undocumented people or information about victims of trafficking. See [Victims of Trafficking](#).

A link to SAVE's website can be found on the HHS Field Intranet. A **SAVE Program Tutorial** is available in LMS which contains information about SAVE and using the website. Additional information on using SAVE and guides can be found in SAVE under Help>Resources.

Documentation of United States Citizenship by Birth

Legal reference: 7 CFR 273.2(f)(2)(ii)

Proof of U.S. citizenship should be required **only** when a household member's citizenship is questionable. If it is necessary to require proof, the following documents, when combined with proof of identity, are acceptable proof of U.S. citizenship:

- A U.S. birth certificate.
- Adoption finalization papers. If the adoption is not yet finalized, the child's original birth certificate or statement from a state-approved adoption agency showing the child's name and that the birth was in the U.S.
- A hospital record made at the time of the child's birth in the U.S. in that hospital.
- A religious record made within three months of birth, which shows the person's date of birth in the U.S. or age at the time the record was made.
- A U.S. passport (with the exception of limited passports that are issued for periods of less than five years).
- *A Certificate of Birth* (form FS-545).
- *A Certification of Report of Birth* (form DS-1350).
- Proof of civil service employment by the U.S. government before June 1, 1976.
- Early U.S. school records that show date of admission to the school, the person's date and U.S. place of birth, and the parent's names and places of birth.
- Census record showing name, U.S. citizenship or a U.S. place of birth, and the person's age or birth date.
- A statement signed by a third party that a person is a U.S. citizen. The statement must contain penalties for helping a person to commit fraud and must be signed by the third party under penalty of perjury.

Documentation not listed above may be presented as proof of citizenship. In this instance, the document may be submitted to the Iowa Department of Health and Human Services central office to verify its acceptability as proof, if necessary.

Documentation of Acquired Citizenship

Legal reference: Public Law 106-395, 7 CFR 273.2(f)(2)(ii)

A child born outside of the United States automatically becomes a citizen of the United States when:

- At least one parent is a U.S. citizen whether by birth or naturalization, and
- The child is under 18 years of age, and
- The child is lawfully admitted for permanent residence and is residing in the U.S. in the legal and physical custody of the citizen parent.

Foreign-born children do not automatically acquire citizenship when adopted by a U.S. citizen. Under the Child Citizenship Act, a child acquires U.S. citizenship on the date that all of the following requirements are satisfied:

- At least one adoptive parent is a U.S. citizen,
- The child is under 18 years of age,
- There is a full and final adoption of the child, and
- The child is admitted to the United States as an immigrant.

If a child's citizenship is questionable, the following listing of documents can be used if needed to verify that the child has acquired U.S. citizenship:

- *Certificate of Citizenship* (N-560 or N-561)
- *Certificate of Naturalization* (N-550 or N-570)

If proof of citizenship is needed, but documentation is not available, refer the person to USCIS for a determination of U.S. citizenship.

Verification for Ineligible Aliens

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

When a SNAP household contains a member who claims to have an immigration status other than that of an "eligible alien," or is unwilling to provide documentation, do not ask for verification of that person's status. Do not attempt to get verification of the person's immigration status from the USCIS. This is true whether the person claims to be legally or illegally present in the U.S.

Reporting Undocumented Aliens

Legal reference: 7 CFR 273.4(b)

At the time of interview, explain alien eligibility criteria and verification procedures to households that include non-citizen members. Verify the status only of household members who are applying for assistance and claim to have an eligible status for the program.

Based on federal guidance, the Department is to report to the USCIS that an alien is not lawfully present in the United States only if we “know” that the alien is not lawfully present. The Department “knows” this only if:

- The alien applies to receive benefits, **and**
- The alien claims to have an eligible status for the program, **and**
- In making a formal determination of eligibility, we receive from USCIS verification of undocumented status, such as a Final Order of Deportation.

NOTE: A SAVE response that shows no service record on a person or shows an immigration status making the person ineligible for a benefit is not a finding of fact or conclusion of law that the person is not lawfully present.

Situations in which the criteria are met for reporting an undocumented alien are extremely rare. For this reason, contact SPIRS Helpdesk for assistance if you believe it may be appropriate to report an undocumented alien.

Sponsored Aliens

Legal reference: Public Law 104-193, 7 CFR 273.4(c)

A “sponsor” is a person who signed an agreement as a condition of the alien’s entry or admission into the United States as a permanent resident to guarantee financial support of the alien. Counting the sponsor’s income and resources towards the sponsored alien is called “deeming.”

NOTE: If the sponsored alien is ineligible for SNAP because of immigration status, the sponsor’s income is not deemed to other members of the non-citizen’s household.

There are two types of sponsored aliens, each with a specific policy for deeming of the sponsor’s income and resources. These types are identified by their documentation:

- Aliens whose sponsor signed the *Affidavit of Support*, form I-134 (used before December 19, 1997). This form is not an enforceable contract and a court cannot force the sponsor to continue to support the non-citizen. Deeming does not apply to aliens sponsored under this form.
- Aliens whose sponsor signed the *Affidavit of Support*, form I-864 (used December 19, 1997 and later).

Refugees, deportees, and asylees do not have sponsors. Organizations and groups are not considered sponsors under SNAP policy.

The following sections explain:

- [Verifying the sponsor's information](#)
- [Deeming when the sponsor signed affidavit I-864](#)

Verifying Sponsor's Information

Legal reference: 7 CFR 273.4(c)

A sponsored alien is responsible for providing information or documentation about the alien's sponsor. USCIS will provide information that sponsors provided on the original *Affidavit of Support*.

Verify the following at the time of both initial application and recertification:

- The income and resources of the alien's sponsor.
- The provision of the Immigration and Nationality Act under which the alien was admitted.
- The date of the alien's entry or admission as a lawful permanent resident as established by USCIS.
- The alien's date of birth, place of birth, and alien registration number.
- The name, address, and phone number of the alien's sponsor.
- Any other information determined to be questionable that affects a household's eligibility and benefit level, according to procedures established for verification.

The Bureau of Consular Affairs of the State Department and local USCIS offices have agreed to provide information to our Department's local offices that is needed to verify information supplied by the alien.

If you do not receive the needed information on a timely basis, the sponsored alien is ineligible until all necessary facts are obtained. Determine the eligibility of any remaining household members.

Treat the income and resources of the ineligible alien (excluding the deemed income and resources of the alien's sponsor) in the same way as those of a disqualified member. They are considered available to determine both the eligibility and benefit level of the remaining household members.

If you receive the verification after determining the eligibility of the rest of the household, act on the information as a reported change in household membership according to the timeliness standards in [7-G](#).

Aliens Sponsored Under Affidavit I-864

Legal reference: 7 CFR 273.4(c)

In order to get SNAP benefits, aliens who have a sponsor must also be eligible aliens as defined in [Who Is an Eligible Alien](#).

The only qualified aliens with legally enforceable affidavits are family-sponsored LPRs, including immediate relatives, and a few employment-based LPRs who came to the United States to work for relatives AND who have filed for a visa application or applied for an adjustment to LPR status on or after December 19, 1997.

More than one person may sign an *Affidavit of Support*, form I-864. If an alien has more than one sponsor, count the deemed income and resources of all sponsors towards the sponsored alien. For the purposes of deeming a sponsor's income and resources, count the income and resources of the sponsor's spouse only if the spouse has also executed *Affidavit of Support*, form I-864.

Determine the amount of sponsor's income to be deemed as follows:

- Step 1: Add the earned income of the sponsors.
- Step 2: Subtract 20% of the earned income.
- Step 3: Add the unearned income of the sponsors.
- Step 4: Subtract the gross monthly income limit for the household size of the sponsor, the sponsor's spouse, and any other person who is claimed or could be claimed by the sponsor or the sponsor's spouse as a dependent for federal income tax purposes.
- Step 5: Divide by the number of aliens sponsored by this sponsor, if known. If not known, the entire amount counts.
- Step 6: The result is the amount of income deemed per sponsored member (entered as unearned income on BCW2).

Money actually paid to the alien by a sponsor is not considered income to the alien, unless the amount paid exceeds the amount deemed, as determined above. Consider the excess as unearned income to the sponsored alien in addition to the amount deemed.

Determine the amount of sponsor's resources to be deemed as follows:

- Step 1: Add allowable resources.
- Step 2: Subtract \$1,500.
- Step 3: Divide by the number of aliens sponsored by this sponsor, if known. If not known, the entire amount counts.
- Step 4: The result is the amount of resources deemed per sponsored member.

Do not deem any income or resources to an eligible child who is under 18 years of age. This is true for both eligible alien and citizen children.

Since children are not subject to deeming, only a portion of a sponsor's income is counted for any adult household members subject to sponsor deeming.

The household consists of a sponsored mom and dad and two eligible children under age 18. It does not matter if the children are citizens or non-citizens. The total countable income deemed to the household from the sponsor is \$1,000.

Since sponsor income cannot be deemed to the children, half (\$500) of the income is counted as deemed income to this household ($\$1,000 / 4 \times 2$ sponsored adults).

Deeming of income and resources ends when

- The alien meets the requirement for 40 quarters of work,
- The alien gains U.S. citizenship, or
- The sponsor dies.

The following sections explain exceptions to these policies for:

- [Battered aliens](#)
- [Indigent aliens](#)

Battered Aliens

A "battered alien" is an alien who:

- Is a battered spouse, battered child, or parent or child of a battered person, and
- Has a petition for residency pending under section 204(a)(a)(A) or (B) or section 244(a)(3) of the INA.

Battered aliens are not automatically eligible for SNAP. A battered alien must meet one of the criteria listed under [Eligible Aliens](#).

A battered alien whose sponsor signed an *Affidavit of Support*, form I-864 may be eligible for SNAP benefits. Do not deem a sponsor's income and resources to a sponsored alien or the alien's children if either the alien or the children have been battered by a family member who was living in the same house as the battered person.

To be eligible for SNAP benefits, the battered person must no longer be living with the batterer. Eligibility is limited to a 12-month period from the date it is determined that alien or the alien's children have been battered or subjected to extreme cruelty.

You may accept the word of the sponsored alien or ask for proof that the battering has taken place.

Following the end of the 12-month period, the exemption from deeming can continue only if the battering or cruelty is substantiated by a court, an administrative law judge or by USCIS.

Indigent Aliens

Legal reference: 7 CFR 273.4

An indigent alien whose sponsor signed an *Affidavit of Support*, form I-864, may be eligible for SNAP benefits.

To determine if the alien is indigent, count the alien's income plus any cash from the sponsor and money paid for food, housing, and shelter by the sponsor or any other person. Count only the actual amount of income and resources that the sponsor and others make available to the alien.

If after considering these things, the alien is unable to obtain food and shelter, the person is considered indigent. The period of eligibility for indigent aliens is 12 months from the date it is determined that the alien is indigent and may be renewed for additional 12-month periods. HHS must notify the USCIS of the alien's situation and provide the USCIS with the names of the alien and the sponsor. Contact SPIRS Helpdesk for assistance if you believe you have an indigent alien who needs to be reported.

An ABAWD can get only three months of SNAP benefits while not meeting the ABAWD work requirement. (See [Time Limit for ABAWDs](#).) After using the three months, some ABAWDs can get an additional three months if they meet the conditions under [Additional Three-Months' Eligibility](#).

ABAWD Exemptions

A person is exempt from the ABAWD work requirements if the person is:

- Exempt from mandatory work registration (MWR) for any reason. See [7-C, Exemptions from Work Registration](#) for a list of exemptions.
- Under age 18. This includes the month in which a person turns 18.
- Aged 55 or over. This includes the month in which a person turns 55. Note: the change to 55 was effective 10/1/24.
- Pregnant. This applies to any trimester.
- Unfit either mentally or physically for employment (has a condition that makes the person unemployable or that prevents the person from keeping a job).
- Experiencing homelessness:

An individual who lacks fixed regular shelter, or who will imminently lose their nighttime residence, or whose primary shelter meets certain conditions, such as congregate shelters, halfway houses, and temporary accommodations for up to 90 days with another individual.

- Under age 25 and aged out of foster care:

Individuals who were in foster care on their 18th birthday or later. Foster care includes extended foster care programs and foster care programs run by District, Territory, Indian Tribal Organizations, or Unaccompanied Refugee Minors Program. This applies to foster care in any state, the individual did not need to be in foster care in Iowa to receive this exemption.

- A veteran:

An individual who served in, and was discharged from, the Armed Forces, including the reserves. Armed Forces include: Army, Marine Corps, Navy, Air Force, Space Force, Coast Guard, and National Guard. The individual's discharge status is irrelevant. This also includes individuals who served as commissioned officers of the Public Health Service, Environmental Scientific Services Administration, or the National Oceanic and Atmospheric Administration.

- A member of a SNAP household that includes a child under the age of 18.

NOTE: This also applies when a child is in the home, but is ineligible for non-financial reasons, like not providing an SSN or having an ineligible alien status.

Homeless Households

Legal reference: 7 CFR 271.2; 273.2(I)(1); 273.3; 273.1(e)

A “homeless person” means a person who does not have a fixed and regular nighttime residence, or who will imminently lose their nighttime residence, or a person whose primary nighttime residence is one of the following:

- A supervised shelter designed to provide temporary accommodations (such as a welfare hotel or congregate shelter).
- A halfway house or similar institution that provides temporary residence for people intended to be institutionalized.
- A temporary accommodation of not more than 90 days in the residence of another person, starting with the day the homeless person moved in with that person.
- A place not designed for, or ordinarily used, as a regular sleeping accommodation for human beings (a hallway, a bus station, a lobby, or similar places).

For homeless households, you can waive the requirement that a household must prove that it lives in Iowa if proof cannot reasonably be obtained. Document in the case file any efforts to verify residency.

Homeless households living in public or private nonprofit shelters for the homeless can get SNAP if they meet all other eligibility criteria. This is an exception to the policy that residents of institutions are not eligible for SNAP.

Ineligible Household Members

Legal reference: 7 CFR 273.1(b)(7)

“Ineligible members” are people who would normally get SNAP with other members of the household but are not included because they are ineligible to participate for some reason. The following are ineligible household members:

- Ineligible students. See [Students](#).
- Ineligible aliens. See [Households with Alien Members](#).
- Ineligible adults who are not disabled and have no dependents. See [Able-Bodied Adults Without Dependents \(ABAWDs\)](#).
- People disqualified for intentional program violation. See [7-J, Intentional Program Violation](#).
- People disqualified for failure to provide a social security number. See [7-C, Social Security Numbers](#).
- People disqualified for failing to respond to a NAC Match.