

September 5, 2025

GENERAL LETTER NO. 7-G-76

ISSUED BY: Bureau of Financial, Food, and Work Supports

Division of Community Access and Eligibility

SUBJECT: Employees' Manual, Title 7, Chapter G, **SNAP Case Maintenance**, Contents 1

and 2, 1 and 2, 13, 15, 17-21, 31-34, 38, 40-44, 46, 48, revised.

Summary

This chapter is revised to update recertification procedures for elderly and disabled households.

Effective Date

Upon receipt.

Material Superseded

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

Page Date

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Additional Information

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

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Overview

This chapter is divided into four sections:

- Household reporting policies
- General policies for acting on changes
- Policies for responding to specific types of changes
- Recertification:
 - What a household must do to keep getting SNAP, and
 - · What the worker must do to determine the household's eligibility.

Reporting Requirements

Legal reference: 7 CFR 273.12

Policy: There are three changes a household must report while certified. These changes must be reported by the 10th day of the month after the month in which they occur. A household must report when:

- Its total gross income goes over the gross income limit for the household's size, or
- An able-bodied adult without dependents (ABAWD) stops working 80 hours, or
- Anyone in the household receives lottery or gambling winnings of \$4,500 or more in a single lottery/gambling winning.

No other changes are required to be reported. However, households are allowed to report other changes and changes may be reported by sources other than the household. Follow guidance for <u>Action on Changes Reported During the Certification Period</u> to determine how and when you must act on reported changes.

Some households will remain eligible after exceeding their gross income limit. They must report each month that they are over their gross income limit, even though they are still eligible for benefits. Exception: A household does not have to keep reporting this if:

- All adults are elderly or disabled and they have no earned income; or
- They are categorically eligible.

Procedure: Discuss *Reporting SNAP Changes* (form 470-2960 or 470-2960(S)) with the household's representative when conducting an interview. Make sure the household understands:

- How to determine when it goes over its gross income limit,
- Which household members are ABAWDs working 80 hours monthly,
- That they must report these things by the 10th of the month after the change occurs, and
- That the form will be automatically generated upon approval.

Comment: The household's gross income limit remains in effect until it is certified for a new benefit period. The reporting limit given at certification does not change during a certification period even if the household size changes.

See <u>Interview</u> for how to explain the reporting requirement to the household.

Household Fails to Report a Required Change

Legal reference: 7 CFR 273.12(a) and (d)

Policy: If a household fails to report that it went over its gross income limit:

- Calculate a claim, starting with the second month after the month in which the household first exceeded the limit. See <u>7-H</u>, <u>Claims</u>.
- Pursue an intentional program violation (IPV) if you believe they deliberately withheld this information for the purpose of obtaining benefits. See <u>7-H, Claims and 7-J,</u> <u>Intentional Program Violation</u>.

Comment: If you learn about a change that the household was not required to report:

- Do not establish a claim,
- Do not issue lost benefits.

Action on Changes Reported During the Certification Period

Legal reference: 7 CFR 273.2(f), and 273.12(c)

Policy: Changes may be reported by the household, an outside source, or an automated report. While all reported changes must be documented, not all changes require **immediate** action. Depending on the nature of the change, the reported change is either:

- Acted on when reported, or
- Documented for follow-up at the next recertification.

Procedure: The flow chart on the next page explains how and when to act on changes reported during the certification period. Use this, along with the policies explained in the following sections, to determine how to proceed. Document all reported changes, regardless of whether or not it was a change the household was required to report.

2. Olivia and her two children are receiving SNAP. On January 18, Olivia reports that they moved and their rent has increased from \$500 to \$600. In addition, her husband, Adam, is now in the home. Adam has income, but it does not cause the household to exceed their reporting requirement for a household of three.

Change the address and send an RFI to verify shelter and utility costs at the new address. If verification is not returned, the shelter and utility deductions must be removed.

Since Adam's income does not cause the household to exceed the income limit, do not request verification of it. However, explain to Olivia that you cannot add Adam until his income is verified. If she voluntarily provides verification, take action to add him (and his income) to the benefits. If not, address Adam and his income at the next application/ recertification.

- 3. Sylvia is an active household of one, and reports that she gave birth to a son. She also reports that the baby's father, Eddie, is in the home and is earning \$500 per month at Gus's Burger Hut. He was not previously included in the SNAP household.
 - Since the baby's birth requires no further verification, he is added to her case for the next month. However, there is no immediate action taken to add Eddie. Even though we know he is there, his income does not cause Sylvia to exceed the income limit. Therefore, unless she chooses to voluntarily provide verification of his income, Eddie and his income will be addressed at the next recertification because the baby makes him a mandatory member.
- 4. Lexi calls to report that her job ended and UIB has started. The combination of income does not cause her to exceed the reporting threshold. You are able to verify the UIB using data sources.

Explain to Lexi that if she voluntarily provides verification of the ending income, you will remove it. However, action on the verified UIB must be taken within 10 days since it will result in decreased benefits, regardless of whether or not the ending income is verified.

Verifying Changes

Legal reference: 7 CFR 273.12(c)(3)

Policy: Based on the information reported, determine what action is necessary. If the change meets the criteria for taking action during the certification period, request any necessary verifications. If it does not, document the report in the case file and follow up at the next recertification (see <u>Clarifying and Verifying Information</u>).

Procedure: Reasonable efforts must be made to obtain third-party verification. Client-provided information can only be used when you have exhausted all efforts and a third-party fails to give you verification. Do this only if you asked the third-party for the verification. Do not use this policy if the household failed to get verification.

Comment: Reasonable effort means you must allow a third-party ample time to respond to a request. Before using client-provided information, be sure to follow all steps on the approved verification process guidance.

When a Change Will Increase Benefits

Legal reference: 7 CFR 273.12(c)(1) and 273.2(f)(8)(ii)

Policy: A change must be verified before you take action that will increase benefits. Document the reported change and follow policies for action on changes during the certification period to determine if you will take immediate action or hold it until recertification. Most changes which will result in increased benefits will be changes that are held until recertification, unless verified upon receipt or voluntarily verified by the household.

Procedure: If verification is needed, see Verifying Changes for instructions.

If you ask the household to give verification of anything other than deductible expenses, take action as follows:

- If you get the verification, increase benefits for the month after the month in which the change was reported.
- If you do not get the verification, cancel benefits because we cannot determine the impact on the case

If verification of a deductible expense is requested, take action as follows:

- If you get the verification by the due date, increase benefits for the month after the month in which the change was reported.
- If you do not get the verification by the due date, remove the deduction for the next month but do not cancel the case. If later provided, increase benefits for the month after the month you receive verification.

See Third-Party Fails to Provide Verification if:

- You ask a third party to give you verification, and
- The third party does not provide it.

Requiring further verification, you must promptly send an RFI to clarify how the change impacts the case. You have 10 days from the time that verification is returned to take required action, allowing for timely notice.

NOTE: If verification is requested and not received by the due date, you must cancel benefits allowing for timely notice.

Procedure: Act on the change within 10 days of report if no further verification is required. If verification is required, see <u>Verifying Changes</u> for how to request verification.

If the household does not return requested verification, cancel the case for failure to provide information. Do not allow additional "mail" or "scan" time if it will cause you to miss timely notice. This means you must pay close attention to any cases in which the due date is on or near "timely notice" date. If the verification is later returned after the case is canceled:

- See <u>Reinstatement</u> if the reason for cancellation no longer exists before the effective date.
- See Reinstatement After the Effective Date of Cancellation (Grace Period).

See <u>Continuing Benefits Under Appeal</u> if the household appeals the *Notice of Decision* and asks to keep getting benefits while waiting for the outcome.

Comment: For timely notice requirements, see <u>1-E, Dispensing With Timely Notice</u>. See 14-B(5), *SNAP Case Actions* for system entry instructions.

Do not initiate a claim if benefits were issued and:

- Timely notice was required, and
- You acted timely.

If it is the final month of the certification period, do not cancel a case unless the reason for cancellation imposes an additional eligibility requirement, such as cooperation with quality control, a work disqualification, or an ABAWD has used their months of eligibility.

- 1. Ms. A reports on April 3 that her son moved out. The impact is clear and this will cause a decrease in benefits. Issue a *Notice of Decision* within 10 days to remove Ms. A's son from the SNAP household effective for May.
- 2. Ms. B reports on April 9 that her hours at work have increased from 10-25 per week. Upon review, there is no record of reported income. She informs you she was working there at application but must have forgotten to report it since the hours were so low. Since we now know that information used at certification was incorrect, an RFI is sent to verify her income.

Verification is received on the due date of April 19, and this income will cause a decrease in benefits. If possible, make the change to decrease benefits for May. However, timely notice is required and it may not be possible to get this done. Since we have 10 days to act on the verification, benefits must be decreased no later than June, allowing for timely notice. In addition, because the job was unreported at application, you need to determine if an overpayment exists for any months.

NOTE: If verification is not received by the due date, benefits must be closed for May, allowing for timely notice. Benefits can be reinstated if we receive the verification or discover it was at HHS but had not yet been scanned.

- 3. Mr. C is receiving SNAP. On July 3 he reports that he started getting child support a couple months ago. We check ICAR and are able to see that payments started. Since this is verified and the impact on the case is clear, action must be taken to decrease benefits for August. There is no overpayment for the child support he received in the prior months since this is not a change he was required to report.
- 4. Household D's certification period is expiring August 31. On August 3, we receive a prisoner match showing that Mr. D is in jail. Since this is the final month of the certification period, you do not need to follow up and take action to decrease or cancel benefits. However, if they apply for recertification, this must be verified prior to recertifying the household for September.
- 5. Household E is in the final month of their certification period when we receive a notice of QC sanction. Even though the certification period is expiring, the household must be notified of the disqualification so they are aware of the additional requirement if they apply for recertification or later reapply for benefits.

<u>Reinstatement</u>

Legal reference: 7 CFR 273.15(k), 441 IAC 65.15(234)

Policy: Reinstate a case if the following two conditions are met before the effective date of cancellation:

- The reason for which the case was canceled no longer exists, and
- Eligibility and benefits can be determined.

Do **not** ask for a new application.

Procedure: Send an adequate notice when you reinstate benefits to the same or to a higher level. See <u>1-E</u>, *Adequate Notice*.

Reinstate even if you make system entries after the effective date of cancellation. See 14-B(5), *Reinstating Benefits*.

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Reinstatement After the Effective Date of Cancellation (Grace Period)

Legal reference: 441 IAC 65.15(234)

Policy: A case that is closed for failing to provide information shall be reinstated if the missing information is returned by the 14th day after the effective date of cancellation. If the 14th day is a weekend or state holiday, the case shall be reinstated if the information is returned on the next working day.

A case must have at least one month remaining in the certification period in order to be reinstated.

Procedure: If the previously requested information is returned by the 14th day after the effective date of cancellation, the case is reinstated. The effective date of reinstated benefits is the date the **final piece of information is received**.

If not all of the information is returned by the 14th day after the effective date of cancellation, no further action is required and another notice is not sent.

If multiple pieces of information were requested and some are returned, do not send a "Remain Cancelled" notice. However, it is good practice to let the household know you still don't have everything you need to reinstate the case.

If the previously requested information is provided, but the household also reports another change, determine if the new change is one that requires action during the certification period. If so, and further verification is needed, make every effort to help the client verify the information. A written request for information for the new change is not required, but the household should be informed that benefits cannot be reinstated until the change is verified.

If the new information is not verified by the end of the 14th day after the effective date of cancellation, send a "Remain Cancelled" notice. The original reason for cancellation has been cured, but the household cannot be reinstated due to a change in circumstances that has not been verified.

Comment: When an additional change is reported and verified by the 14th day and the change will cause a decrease in benefits, do not reinstate to the previous level of benefits. Reinstate benefits using all of the new information, regardless of the effect on benefits.

If it is unlikely you will be able to verify additional information before the 14-day period expires, you should inform the client that it would be a good idea to get a new application submitted to preserve the earliest possible effective date, in case the information cannot be verified.

Once the information is returned, the effective date will be the date the information is provided or the new application date, whichever is earlier.

- Household A is approved for SNAP. After approval, they call to tell us they
 forgot to report their 19-year old son's income at Employer M when they
 applied. Since this indicates the wrong information was used at time of
 certification, we must follow up with an RFI. They fail to provide information
 that is due on January 12. SNAP benefits are canceled effective February 1.
 On February 6, the missing information is provided. Benefits are reinstated
 effective February 6.
- 2. Same as example 1, except on February 3 the household also reports that another member started a job. The total household income does not cause the household to exceed the income limit. Therefore, verification is not requested and that change is held until the next recertification. Once missing verification of the 19-year old's income is returned on February 6, benefits are reinstated effective that day.

NOTE: If the 2nd change requires action during the certification period, verification of that change would also be needed by the 14th in order to apply grace period policies and reinstate the case.

Continuing Benefits Under Appeal

Legal reference: 7 CFR 273.15(k), and 441 IAC 7.17(17A)

Policy: Unless the household indicates that they don't want their benefits to continue during the appeal process, assume they want benefits continued and act accordingly. Reinstate benefits to the amount the household got before the adverse action under appeal.

When the adverse action is the result of an application or recertification, do not reinstate or continue benefits. There are no benefits to continue if there is not an established certification period.

Procedure: Return the household's benefits to the level authorized before the action under appeal. Keep benefits at this level until the household:

- Gets a final decision.
- Has a new change. Act on the new change:
 - Keep the factor under appeal held constant.
 - Issue a new Notice of Decision.
- Applies to be recertified. Do not keep the factor under appeal held constant for the new certification period.

For system entries, see 14-B(5), Continuing Benefits When a Timely Appeal Is Filed.

New Reason to Keep a Case Canceled or Benefits Reduced

Legal reference: 441 IAC 65.15(234)

Policy: A household must receive a second notice when there is a new reason to take a negative action on a canceled case. This also applies when benefits are reduced.

Do not use "Remain Canceled" when:

- The household does not have a new reason for cancellation.
- The household was previously closed for any reason and does not provide information. This could happen if the household disagrees with their reason for closure but does not provide additional information to redetermine eligibility.

Procedure: Send a notice for a new reason for which a case must remain canceled, if the original notice does not cover the new reason. See <u>14-B(5)</u>, *Issuing Another Notice Regarding New Information*.

See <u>1-E</u>, *Notice of Decision* to see if timely notice applies. If the second negative action requires timely notice, it is too late to give timely notice, and the first reason for the negative action no longer applies:

- Reinstate the household to its previous level of benefits if the household cures the original reason for cancellation by the effective date of cancellation. See Reinstatement.
- Then give timely notice to reduce or cancel the benefits for the next month.

Comment: Do not establish a claim if:

- You reinstate to the previous benefit level, and
- You gave timely notice for the new reason, and
- The household reported the second change timely, and
- You acted in a timely manner.

FIP Is Terminated

Legal reference: 7 CFR 273.12(f)(3)

Policy: SNAP benefits will automatically be adjusted when FIP ends. No further action is required on the SNAP case, unless the reason for cancellation is something that meets the criteria for taking action during the certification period.

NOTE: If FIP is on a separate case, the system will not automatically adjust benefits, so you must take appropriate action to remove the FIP income.

If the household appeals the FIP cancellation and:

- Asks to keep getting SNAP until the outcome of its appeal, keep benefits at the same amount as before FIP ended.
- Does not ask to keep getting SNAP until the outcome of its appeal, cancel or reduce the SNAP benefits. Give timely notice if needed.
- Alice and her daughter, Lucy, receive FIP and SNAP. Alice sends a note asking to cancel FIP (not SNAP) because Lucy's dad moved back in, but doesn't provide information about him. FIP is canceled per her request. No action is taken on SNAP because Alice wasn't required to report him in the home and there is no indication they have exceeded the income threshold for SNAP.
 - If Alice later asks why Lucy's dad wasn't added to SNAP, explain that we didn't have enough information to add him. Find out if he has anything that must be verified and act accordingly based on how to act on changes reported during the certification period.
- 2. Jenny and her two children receive FIP and SNAP. On January 15, Jenny reports she started working and will be earning \$800 per month. An RFI for income verification is sent for FIP only. Remember you can't request verification for SNAP since she was not required to report it.
 - Jenny doesn't return the verification and her FIP is canceled. However, no action is taken on SNAP. This reported change is held for follow-up at recertification.
 - If Jenny later provides the verification, it is now verified information and must be used for SNAP since the impact on the case is clear.

Penalty for Means-Tested Program Sanction

Legal reference: 7 CFR 273.11(j)

Policy: A 10% SNAP penalty applies to sanctions in all means-tested programs.

Procedure: Ask the SPIRS Help Desk before you apply a penalty for a program other than FIP.

Comment: Other than FIP, we aren't aware of any means-tested programs that reduce cash benefits as a sanction. SSI reduces cash benefits to collect on an overpayment. This is a collection action, not a penalty. See 7-E, *Recoupment*.

Mr. Q's SSI payment is being reduced to collect on an SSI overpayment. The Social Security Administration representative tells you that Mr. Q purposefully did not report earnings. The Social Security Administration did not sanction Mr. Q, but recouped the overpayment over a series of months.

The 10% reduction is not applied to Mr. Q's SNAP because his SSI payments are being reduced as a recoupment.

Penalty for a FIP Sanction

Legal reference: 7 CFR 273.11(j)

Policy: Reduce a household's SNAP by 10% when its FIP grant is reduced due to a FIP sanction. Apply the 10% reduction of SNAP for the same months FIP applies the sanction.

Procedure: Impose the penalty when a household's FIP is reduced as a sanction due to failure to:

- Apply for other benefits for which the FIP recipient may qualify, or
- Cooperate with the Child Support Recovery Unit.

Apply the SNAP penalty and the FIP sanction at the same time. Leave the penalty as long as the FIP sanction is in place.

Do not apply the penalty when FIP is reduced for any reason not listed above. It is not a sanction when:

- A household is placed in the FIP limited benefit plan, or
- FIP is being recouped. See 7-E, Recoupment.

To implement the 10% penalty, see <u>14-B(5)</u>, <u>Penalty for Not Following Another</u> <u>Program's Rules</u>. Do not apply the 10% SNAP penalty retroactively.

The penalty is not imposed on eligible one-member and two-member households who are eligible for the minimum benefit due to categorical eligibility, because the decreased FIP income does not result in increased SNAP benefits. Workers do not determine this. Code the penalty when applicable, and the system will disregard it for these households.

Comment: A FIP grant can increase even if a FIP sanction is in place. The 10% penalty still applies if the grant increases during the FIP sanction period.

Establish a claim for any month in which the penalty should have been in place, if it is later discovered that the SNAP penalty was not applied.

Mrs. C fails to cooperate with CSRU in July. The worker sanctions Mrs. C by reducing her August FIP grant. The worker forgets to start the 10% SNAP penalty when reducing Mrs. C's August FIP grant.

In October, Mrs. C verifies that she cooperated with CSRU. The worker ends the FIP sanction for October. At that time, the worker discovers that the 10% SNAP penalty was never applied. The worker must establish a SNAP claim for August, September, and October.

Penalty When Sanctioned Household Applies for FIP or SNAP

Legal reference: 7 CFR 273.11(j)

Policy: When a FIP sanction is in place and a household:

- Applies for SNAP and FIP on the same application, start the 10% penalty when you approve the application.
- Applies for FIP on an ongoing SNAP case, start the 10% penalty to SNAP for the month after FIP is approved. Timely notice is required.
- Applies for SNAP on an ongoing FIP case, start the 10% SNAP penalty when you approve SNAP benefits.
 - Mr. M has an active SNAP case. In March, he applies for FIP and a prior sanction is in place. He fails to cure the sanction and FIP is approved on March 13. The 10% reduction is applied to his SNAP for April.
- 2. Ms. R's household is approved for FIP and SNAP on May 7. Ms. R's FIP grant is still under sanction for failing to cooperate with CSRU. Because the FIP sanction is in place when FIP and SNAP are approved at the same time, Ms. R's SNAP is reduced by 10% for May.
- 3. Ms. T applies for SNAP and FIP on October 18, and has a prior child support sanction. She is eligible for emergency service and is approved for SNAP on October 19. Since FIP is not active at the time of SNAP approval, the 10% penalty is not applied. When FIP is later approved on October 29, the 10% penalty is imposed for December benefits, allowing for timely notice.

Ending the 10% Penalty

Legal reference: 7 CFR 273.11(j)

Policy: Do not apply the 10% SNAP penalty in months FIP is suspended or canceled.

Procedure: Stop the 10% penalty when FIP is canceled or ends the sanction. To stop the penalty, see <u>14-B(5)</u>, *Removing a 10% Reduction*.

Do not end a penalty when FIP ends a sanction by issuing extra benefits for a past or current month.

If FIP applied a sanction in error, recalculate SNAP without the penalty for those months. Issue lost benefits or a supplemental allotment. For system entries, see 14-B(5), Removing a 10% Reduction and Recomputing Benefits for Past Months.

Mrs. N fails to cooperate with CSRU in May. Her FIP grant reduction and 10% reduction in SNAP start in June. Mrs. N cooperates with CSRU. The FIP sanction ends for August and FIP issues an additional payment for August.

The 10% reduction in SNAP ends effective September 1. SNAP for August is not recalculated, because the 10% reduction for August was correctly applied when the reduction was made.

Acting on IEVS and Other Automated Reports

Legal reference: 7 CFR 272.8, 273.2(f)(9)(iii), and 273.12

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.

If the information meets the criteria for action during the certification period and was:	Then:
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).

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 <u>7-C, Cooperation.</u> See <u>Reinstatement</u> if the household cooperates before the effective date of cancellation.

Recertification

Legal reference: 7 CFR 273.2(f)(8), 273.14

Policy: Households must recertify to get benefits for a new certification period. To recertify, a household must meet all of these requirements:

- Apply using the Review/Recertification Eligibility Document (RRED), or an Iowa SNAP application form,
- Attend an interview with HHS when required. See <u>Interviews</u> section in this chapter, and
- Provide verification when required.

Procedure: Treat the RRED as an application to recertify if it contains at least a name, address, and handwritten signature. Because an application contains all of the information found on a RRED and more, a valid application may be accepted in place of a RRED. However, treat it as a recertification and follow processing guidelines for RREDs.

When completing a RRED, households only need to answer SNAP questions and provide proof where stated. All SNAP questions must be answered before you can recertify the household.

Help the household get verification if they ask for help. Don't deny or cancel the household when a person outside the household fails to provide information.

A household can complete missing answers on the RRED at the time of interview. If there is no face-to face interview:

- When recertifying with a telephone interview:
 - Fill in answers during the interview,
 - Make a copy of the RRED for the case file, and
 - Send the original to the household with a written request for information. Tell the household to review and initial changes, and to return the form within 10 days.

Interviews

Legal reference: 7 CFR 273.14(b)(3)

Policy: Households must be interviewed at recertification when required:

- Households with all adult members who are elderly or disabled and don't have earned income are not required to have an interview at recertification unless the household requests one or the worker decides an interview is necessary
- All other households are required to have an interview at least once every 12 months

Non-interview/Desk RREDs:

If the household is due for a non-interview (desk) RRED, an interview should only be conducted if:

- There's a complicated situation and further explanation is necessary or,
- You call to clarify multiple pieces of information and decide to review the entire RRED so that an interview will not be required again in six months.
 - If you choose to conduct a complete interview when you call to clarify information, be sure to cover all aspects of the household's circumstances and follow processes for conducting the interview.
 - Document the reason an interview was conducted, and code the next recertification as a non-interview RRED.

If an interview is scheduled for a non-interview RRED, clearly document the reason for scheduling it. If you don't document this, you cannot deny a household for failure to attend an interview.

Procedure: You may schedule an interview:

- Before the household files its RRED if you schedule it for a date that is after the RRED is due. or
- After the household files its RRED.

If the RRED is filed timely, you must schedule an interview for a date that allows 10 days before the end of the certification period for the household to turn in missing verification.

If the RRED is filed untimely, schedule the interview for the earliest possible date.

Comment: Interviews may only be scheduled at the time of application and recertification. Scheduling an interview during the certification period is not allowed.

Scheduling Interviews

Legal reference: 7 CFR 273.14(b)(3)

Procedure: Upon receipt of a RRED, attempt to contact the household by telephone if the recertification requires an interview. If contact is made with the household, conduct the interview at that time if the household agrees to do so.

If contact is not made with the household:

- Leave the standard voicemail message, as explained below, at the telephone number provided.
- Provide at least 24 hours advance notice of the scheduled interview. Do not schedule an interview for the same day as the initial interview attempt.
- Document the specific date and time of the scheduled interview.
- The timeframe for interviews cannot exceed a two-hour window of time. For example: 8 a.m. to 10 a.m.
- If you are unable to leave a voicemail message, an appointment letter must be mailed within one business day.

In order to schedule an interview by voicemail, one of the following standard voicemail messages must be left for the client. There are different scripts for RREDs processed by a single worker and those processed by a team:

- **Specific Worker:** "This is (*worker's name*) with the Department of Health and Human Services calling for (*client's name*). I received your recertification form for SNAP and need to do a phone interview. Please call me at (*worker phone number*) as soon as possible.
 - "If I don't hear from you by (day, date and time), I will call you on (day, date) between (window of time). If I can't reach you, your benefits will end. If this time does not work for you, please call me immediately so we can reschedule. Thank you."
- **Team:** "This is (*worker's name*) with the Department of Health and Human Services calling for (*client's name*). We received your recertification form for SNAP and need to do a phone interview. Please call (*worker phone number*) as soon as possible.
 - "When you call, be sure to ask for a RRED worker. Any RRED worker will be able to help you. If we don't hear from you by (day, date and time), we will call you on (day, date), between (window of time). If we can't reach you, your benefits will end. If this time does not work for you, please call me immediately so we can reschedule. Thank you."

Remember: When you call back for the scheduled interview, you must attempt the call twice (five minutes apart) and document those attempts before considering the household to have failed to attend a scheduled interview.

Conducting the Interview

Legal reference: 7 CFR 273.14(b)(3)

The interview is an official and confidential discussion of household circumstances. The purpose of the interview is to obtain the details of the household's situation so eligibility can be determined.

Conduct the interview according to the household's situation. Although you need to review the entire RRED, some responses will require more examination. For example, if proof is provided or circumstances are fairly stable, you do not need to go into as much detail in the interview. However, if the household needs help or circumstances are error-prone, ask probing questions to clarify the situation.

Explaining Simplified Reporting

Legal reference: 7 CFR 273.12(a)(5)

Policy: At each interview, explain to the household what changes must be reported and how and when to report these changes.

Procedure: Explain reporting requirements to the household every time you interview. Explaining this carefully will help avoid household-caused errors. See <u>7-B</u>, <u>Household Reporting Requirements</u> for details about information to provide when explaining reporting requirements.

Failure to Attend the Interview

Legal reference: 7 CFR 273.2(e) and 273.14(b)(3)

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

Procedure: Send a *Notice of Decision* on the day the household misses its interview. This notice tells the household the timeframe within which it must reschedule.

- If the RRED was filed by the last day of the certification period, use notice reason 523.
- If the RRED was filed after the last day of the certification period, use notice reason 522.

NOTE: When using notice reason 522, you must track this time frame. Make system entries to deny the application on the 30th day after the RRED was filed unless the household reschedules and appears for an interview. If the 30th day falls on a weekend or holiday, make system entries the next working day.

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)

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.

Procedure: It is important that you review narratives back to the prior application or recertification. This must be done to ensure that all reported changes are addressed.

If a household fails to provide requested verification needed to determine eligibility by the due date, deny the application using notice reason code 206.

If a household turns in all verification after the application is denied but before the end of the certification period, reopen the case and provide a full month of benefits for the first month of the new certification period.

If the verification is received after the end of the certification period, reopen the case and prorate benefits.

See specific policies for your case situation in <u>RRED Filed Before the End of the Certification Period</u> or RRED Filed After the End of the Certification Period.

Don't deny an application for failure to verify an expense. However, do not allow a deduction if required verification of an expense is not provided. If a previously verified expense has not changed, verification is not required. EXCEPTION: If the household has moved, verification of shelter and utility expenses at the new address is required, even if the amount is the same.

Comment: You cannot deny a household for failure to provide verification if:

- An interview is required, but it has not been held, or
- You did not ask for verification in writing, or
- You did not give the household 10 days to provide verification, or
- You asked a third-party for the verification but the third party failed to provide it.

- 4. Ms. D files a non-interview RRED on August 8 to recertify benefits for September. During the prior certification period, she started a job at The Gas Station which didn't require verification at the time. On the RRED, she reports no income.
 - You can attempt to call her to clarify what happened to the job at The Gas Station. If you don't reach her, or if you reach her and further verification is required, an RFI must be sent requesting verification of her job, including ending information if applicable.
- 5. Mr. E files a non-interview RRED on September 3 to recertify benefits for October. During the past certification period, there were multiple changes reported for which verification was not required. Since you know you need to clarify his situation and that verification may not be needed for some of the changes, you determine it would be easier to resolve all of the information by conducting an interview. This will likely minimize the amount of verification requested.
 - Document the reason for scheduling an interview and proceed with processing of this RRED as an "interview" RRED. An interview will not be required in six months.
- 6. Ms. F files a non-interview RRED on October 6 to recertify benefits for November. There was one change reported during the prior certification period which must be clarified. You call her to do this, and she starts to inform you of multiple other changes that will need to be resolved.

Because of the complexity of her situation, you determine it would be easier to conduct a full interview. Review the entire RRED and send a request for any necessary verification.

Document the reason for conducting an interview and proceed with processing of this RRED as an "interview" RRED. An interview will not be required in six months.

Determining Eligibility and Benefits

Legal reference: 7 CFR 273.10(a)(2), 441 IAC 65.9(234)

Policy: When processing an application for recertification:

- See <u>Timely Processing a RRED</u> and <u>Delays in Processing a RRED</u> for processing time frames and effective dates.
- Base eligibility and benefits for the new certification period on the household's anticipated circumstances.

Procedure: Do the following to anticipate the household's circumstances:

- Determine household composition based on what is anticipated for the first day of the new certification period.
- 2. Calculate a new income estimate. Follow the policies in 7-F.

If the RRED is denied because the household fails to take a required action, the household has 30 days after the end of the certification period to complete the process and have its RRED treated as an application for recertification.

If the household takes required actions after the end of the certification period but within 30 days after the end of the certification period, reopen the case and prorate benefits from the date the household takes the last required action.

- 1. Ms. T files a RRED on April 5 to recertify benefits for May. Requested verification, due by April 18, is not provided. The application for recertification is denied. Ms. T returns all needed information on May 10. The recertification is approved and benefits are prorated from May 10.
- 2. Mr. C files a RRED on June 2 to recertify benefits for July. The household misses its scheduled interview and a SNAP *Notice of Missed Interview* and denial notice (notice reason 523) is sent on June 12.
 - Mr. C reschedules an interview for June 25. During the interview, the worker determines additional information is needed. A 10 day written request is issued and the information is due by July 5.
 - If the household returns the information early and it is received by June 30 (the last day of the certification period), benefits will not be prorated. The effective date will be July 1.
 - If the household returns the requested information after June 30 (the last day of the certification period), benefits will be prorated from the date the information is received because the household caused a delay by missing its scheduled interview. Note: If the information is returned later than July 30, the household will have to reapply.
- 3. Ms. J files a RRED on May 28 to recertify benefits for June. Requested verification, due by June 8, is provided on June 8. The RRED was filed untimely but the household did not cause a delay after filing the RRED. The recertification is approved and the household is entitled to a full month of benefits for June.
- 4. Ms. G files a RRED on April 20 to recertify benefits for May. Requested verification, due April 30, wasn't received so the recertification was denied for not returning the requested information. On May 6, the household provides the information. The case is reopened and a new certification period is approved but because the household caused a delay in processing, benefits are prorated from May 6, the date the information was returned.