

STATE OF IOWA DEPARTMENT OF

Health <sup>AND</sup> Human

SERVICES

Employees' Manual  
Title 7,  
Chapter A

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# SNAP Administration

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## **Overview**

This chapter details the overall administrative requirements of Iowa's Supplemental Nutrition Assistance Program (SNAP), including a list of definitions used in the program. The chapter explains the Department's administrative responsibilities, issuance of benefits by electronic benefit transfer, and the rights and responsibilities of SNAP participants, including program violations and how participants may use benefits. Also included are policies specific to facilities.

The policies and procedures in this chapter are based on the Food and Nutrition Act of 2008, as amended. The portion of the Code of Federal Regulations that interprets the Food and Nutrition Act is Title 7. Department rules in 441 Iowa Administrative Code Chapter 65 implement the SNAP program in Iowa.

### **Purpose and Organization of the Program**

Legal reference: 7 CFR 271.4(a) and (b), 273.18

SNAP is a uniform nationwide program intended to promote the general welfare and safeguard the health and wellbeing of the nation's population by raising the levels of nutrition among low-income households.

The U.S. Department of Agriculture's Food and Nutrition Service (FNS) administers the program. FNS delegates to the Iowa Department of Health and Human Services the responsibility for the administration of the program within the state. These responsibilities include, but are not limited to:

- Certification of applicant households in compliance with federal regulations.
- Issuance, control, and accountability of SNAP.
- Program information activities.
- Developing and maintaining complaint procedures.
- Developing, conducting, and evaluating training.
- Conducting performance reporting reviews such as quality control and management evaluation.
- Submitting accurate and timely financial and program reports.
- Keeping records necessary to determine whether the program is conducted in compliance with federal regulations

FNS also delegates to the state agency, subject to the standards in 7-H, [Adjustments](#), the authority to handle any claim that results from fraudulent or nonfraudulent overissuances to participating households. The state agency has the authority to:

- Determine the amount of a claim.
- Settle, adjust, or compromise a claim.
- Deny all or part of a claim.

Some of these responsibilities are delegated to the field offices, the central and field offices share some jointly, and some remain strictly a central office responsibility. Title 7 of the Employees' Manual explains the division of responsibilities and certification procedures.

## **Definitions**

Legal reference: 7 CFR 271.2, 273.10(a)(ii), 441 IAC 65.1(234)

**“Adequate notice”** is a written notice that informs the household of:

- An action the Department is taking,
- The reason for the action,
- When the action is effective,
- The manual number, chapter number, and subheading supporting the action,
- The household’s right to a fair hearing, and
- How the household can request continuing assistance when it requests a hearing.

Adequate notice must be given no later than:

- Before the action;
- On the date benefits are available; or
- At the time benefits would have been received had they not been terminated.

**“Allotment”** means the total value of benefits a household is authorized to receive during a month.

**“Certification period”** means the period for which households are certified to receive SNAP benefits.

**“Communal dining facility”** means a public or nonprofit private establishment, approved by FNS, which prepares and serves meals for elderly people or for Supplemental Security Income (SSI) recipients and their spouses. It includes:

- Senior citizens’ centers.
- Apartment buildings occupied primarily by elderly people or SSI households.
- Public or private nonprofit establishments (eating or otherwise) that feed elderly people or SSI recipients and their spouses.
- Federally subsidized housing for the elderly at which meals are prepared for and served to the residents.
- Private establishments that contract with a state or local agency to offer meals at concessional prices to elderly people or SSI recipients and their spouses.

**“Date of entry”** or **“date of admission”** means the date an alien was lawfully admitted for permanent residence in the United States, as established by the federal government.

**“Disabled”** means meeting the requirements under [Disabled Member](#) later in this chapter.

**“EBT”** means electronic benefits transfer, the method the Department uses to issue SNAP benefits.

**“EBT card”** means the magnetic plastic swipe card that SNAP participants use to access their benefits at retail outlets.

**“EBT customer service”** in Iowa is accessed for cardholders by calling 1-800-359-5802. Retailers access customer service by calling 1-800-414-1422.

**“Elderly person”** means a person 60 years of age or older.

**“Emergency service”** means faster processing. Households must meet certain criteria to be eligible for emergency service. Households eligible for emergency service must receive their benefits within seven days after the date of application.

**“Enrolled in an institution of higher education”** means a person enrolled in:

- A business, vocational, technical or trade school that normally requires a high school diploma or equivalency certificate for enrollment in the curriculum.
- A regular curriculum at a junior, community, two-year, or four-year college or university that offers degree programs, regardless of whether a high school diploma is required. This does not include special programs such as courses for English as a second language that are not part of the regular curriculum.

**“EPPIC®”** means Electronic Payment Processing and Information Control, which is a trademarked data processing system owned by Conduent, Iowa’s EBT contractor. EPPIC® provides an interface between the Department and Conduent by transferring information from the Automated Benefit Calculation (ABC) system to Conduent. EPPIC® does not transmit information to ABC. (See [14](#) for more information on EPPIC®.)

**“Federal fiscal year”** means a period of 12 calendar months beginning with each October 1 and ending with September 30 of the following calendar year.

**“FIP”** means the Family Investment Program, which is Iowa’s Temporary Assistance for Needy Families (TANF) cash assistance program.

**“FNS”** means the Food and Nutrition Service of the United States Department of Agriculture, which is the federal agency that administers the Supplemental Nutrition Assistance Program.

The **“Food and Nutrition Act of 2008”** is the federal law that authorizes the Supplemental Nutrition Assistance program and was formerly known as the Food Stamp Act of 1977 (Public Law 95-113), including any subsequent amendments.

**“General assistance”** means:

- Cash or another form of assistance, excluding in-kind assistance,
- Which is financed by state or local funds,
- As part of a program that provides assistance to cover living expenses or other basic needs intended to promote the health or wellbeing of recipients.

This includes veterans’ relief (other than assistance for burial expense of deceased veterans and their survivors), general relief, and Indian relief. General assistance means government, as opposed to private, funds administered on the state or local level.

**“Homeless meal provider”** means a public or private nonprofit establishment (e.g., soup kitchen, temporary shelter) that the local office approves, upon presentation of sufficient evidence, as serving meals to homeless persons.

**“Homeless person”** means a person who lacks a fixed and regular 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 persons intended to be institutionalized.
- A temporary accommodation in the home of another person. (The situation is no longer considered “temporary” after a person has lived in another person’s home for 90 days.)
- 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).

**“Initial application”** means an application made by or on behalf of a household that:

- Is not certified on the date of the application or
- Has made an untimely application for recertification more than 30 days after the household’s certification has expired.

**“Initial month”** means the first month the household is certified for SNAP following any break in participation. **Exception:** For migrant or seasonal farm worker households, “initial month” means the first month the household is certified following a break of at least one month in participation.

The initial month is the only month benefits are prorated.

**“Intentional failure to comply”:**

- In the FIP or veteran pension program means when fraud is established by a court.
- In the SSI program means when the Social Security Administration verifies that the client committed fraud.

**“Intentional program violation”** (IPV) is any act that violates the Food and Nutrition Act, program regulations, or state statute relating to SNAP.

**“IVR”** means interactive voice response. An IVR is a dial-in inquiry system. Use of the system requires a touch-tone or digital phone. Iowa’s EBT customer service is an IVR system. A customer service representative can be accessed through it.

**“Liquid resources”** means resources that can readily be converted into cash. Examples of liquid resources are: cash on hand, money in checking or savings accounts, credit union accounts, savings certificates, current market value of stocks and bonds, and nonrecurring lump sum payments.

**“Manual voucher”** is a paper form that is used to complete a SNAP transaction when a retailer’s equipment is not working. Retailers that do not have equipment to accept an EBT card use only manual

vouchers. Only FNS authorized retailers can use manual voucher forms.

**“Maximum allotment”** means the maximum amount of benefits a household can be authorized to receive during a month. The allotment is based on the Thrifty Food Plan.

**“Meal delivery service”** means a service provided by a political subdivision, a private nonprofit organization, or a private establishment with which the state or local government has contracted for the preparation and delivery of meals at concessional prices to:

- Elderly people and their spouses; and
- Persons who are physically or mentally handicapped or otherwise disabled such that the person is unable to prepare all meals adequately, and those persons’ spouses.

**“Meal service”** is a firm authorized by FNS to accept SNAP as payment for prepared meals.

**“Means-tested program”** means a program that uses income and resource guidelines to determine eligibility. SSI and FIP are examples of means-tested programs. Social Security benefits and Unemployment Compensation are not means-tested programs.

**“Medicaid”** means medical assistance administered by the state.

**“Migrant”** means a person who moves on a regular basis to find work in harvesting crops or other agricultural activities.

**“Minimum benefit”** means the minimum monthly amount of benefits that one- and two-person households receive. The amount of the minimum benefit is equal to eight percent of the maximum monthly allotment for a one-person household. See 7-F, [Exceptions to Benefit Level](#).

**“Nonliquid resources”** means resources that cannot be easily converted into cash. Examples are personal property, licensed and unlicensed vehicles, buildings, land, and recreational property.

**“Nonprofit cooperative food purchasing venture”** means any private nonprofit association of consumers whose members pool their resources to buy food.

**“Normal issuance cycle”** is from the first of one calendar month to the first of the next calendar month for all eligible households. The required staggered issuance of SNAP does not alter this normal issuance cycle.

**“Overissuance”** means the amount by which benefits issued to a household exceed the amount it was eligible to receive.

**“PAN”** means the primary account number on the front of the EBT card.

**“Parent”** means a person who is the legal parent, natural parent, or stepparent of a child, and includes persons having parental control over a child.

**“Parental control”** means living with and fulfilling the role of a parent, financially or otherwise, for a child under age 18. A child is not under parental control if the child is married, because state law



defines a married person as an adult.

**“PIN”** means personal identification number. For EBT, the PIN is a four-digit number that the cardholder enters into a point-of-sale device using the device’s keypad to access the household’s SNAP account.

**“Primary cardholder”** means the SNAP case name on the ABC system.

**“Program”** means the SNAP program conducted under the Food and Nutrition Act and regulations.

**“Project area”** means the area designated by the state for program operations. In Iowa, the state as a whole has been designated as a single project area.

**“Prospective budgeting”** means that the assistance computation is based on an estimate of the income, expenses, and other circumstances that will exist in the certification period.

**“Public assistance household”** means a SNAP household in which at least one member is applying for or receiving assistance through the FIP or refugee cash assistance program.

**“Seasonal farm worker”** means a person who works on a farm or ranch on a seasonal basis when the work is generally within commuting distance of the person’s home.

**“Secondary cardholder”** means a household member authorized by the primary cardholder to receive an EBT card on the household’s SNAP account.

**“Shelters for battered women and children”** means public or private nonprofit residential facilities that serve battered women and their children. If a facility serves other people, a portion of the facility must be set aside on a long-term basis to serve only battered women and children.

Only shelters that function exclusively to serve battered women with or without children are included in this definition. Any residence that takes care of such women from time to time in addition to serving as a regular residence for others, such as a private home or boarding house, is not included unless a portion of the regular residence is reserved on a long-term basis to shelter battered women.

**“Single parent”** means a parent living with a child and not living with that child’s other legal or natural parent, or not living with a spouse.

**“Sponsor”** means a person who executed an affidavit of support 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.

**“Sponsored alien”** means those aliens lawfully admitted for permanent residence into the United States as described in 7-I, [Specific Households and Participants](#).

**“Spouse”** refers to either of two persons who have a valid marriage. This includes common-law marriage, as defined by the case law of the Iowa Supreme Court. The necessary elements of a common law marriage are:

- Intent and agreement to be married,
- Continuous cohabitation, and
- Public declaration that parties are married.

**“State Income and Eligibility Verification System (IEVS)”** means a system of information acquisition and exchange for purposes of income and eligibility verification which meets the requirements of Section 1137 of the Social Security Act.

**“Supplemental Security Income (SSI)”** means monthly cash payments made under the authority of one of the following:

- Title XVI of the Social Security Act, to the aged, blind, or disabled, or
- Section 1616(a) of the Social Security Act, or
- Section 212(a) of Public Law 93-66.

**“Systematic Alien Verification for Entitlements (SAVE)”** means the U.S. Citizenship and Immigration Services program whereby state agencies may obtain information from a central data file to verify the validity of documents provided by aliens applying for benefits.

**“Thrifty Food Plan”** means the diet required to feed a family of four persons consisting of a man and a woman 20 through 50 years of age, a child aged 6 through 8, and a child aged 9 through 11, as determined by the Secretary of the U.S. Department of Agriculture. The cost of this diet is the basis for allotments for all households, regardless of their actual composition, after household-size adjustments taking into account economies of scale and other adjustments as required by law.

**“Timely notice”** means a notice is given at least ten calendar days before the date the action is effective. For a mailed notice, the ten-day period begins on the day after mailing.

**“Trafficking”** means buying, stealing, or selling of electronic benefit transfer (EBT) cards. This includes trading benefits for firearms, ammunition, explosives, controlled substances, or anything other than eligible food. Trafficking is an IPV.

**“Tribal TANF payments”** means assistance that Native American Tribes may provide in place of assistance from the Family Investment Program (FIP.) Treat a person who receives Tribal TANF payments the same as a FIP recipient for purposes of determining:

- Categorical eligibility, see 7-C, [Categorically Eligible FIP and SSI Households](#)
- Exemptions from work registration, see 7-C, [Exemptions From Work Registration](#)
- Countable resources, see 7-D, [Whose Resources to Count](#)
- Student eligibility, see 7-I, [Eligible Students](#)

**“Underissuance”** means less benefits were issued than the household was entitled to receive.

**“Untimely application for recertification”** means an application filed after the date specified on the *Review/Recertification Eligibility Document*.

**“U.S. Citizenship and Immigration Services”** or **“USCIS”** means the U.S. Citizenship and Immigration Services of the Department of Homeland Security.

**“Wholesale food concern”** means an establishment that sells eligible food to retail food stores or to meal services for resale to households.

**Disabled Member**

“Disabled member” means a household member who meets at least one of the following:

- Receives SSI benefits under Title XVI of the Social Security Act (SSA) or disability or blindness payment under Titles I, II, X, XIV or XVI of the SSA.
- Receives federal or state supplemental benefits under section 1616(a) of the SSA and eligibility for benefits is based on the disability or blindness criteria under Title XVI of the SSA.
- Receives federal or state supplemental benefits under section 212(a) of Public Law 93-66.
- Receives disability retirement benefits from a governmental agency because of a disability considered permanent under Section 221 (i) of the SSA.
- Is a veteran who, under Title 38 of the United States Code, either:
  - Has a disability rated or paid as total by the Veterans Administration, or
  - Is considered by the Veterans Administration to be in need of regular aid and attendance or to be permanently housebound.
- Is a surviving spouse of a veteran who, under Title 38 of the U.S. Code, either:
  - Is considered by the Veterans Administration to be in need of regular aid and attendance or to be permanently housebound, or
  - Receives or has been approved for compensation for a service-connected death or a pension benefit for a nonservice-connected death, and has a disability considered permanent under Section 221 (i) of the SSA.
- Is a surviving child of a veteran who, under Title 38 of the U.S. Code, either:
  - Is considered to be permanently incapable of self-support, or
  - Receives or has been approved for compensation for a service-connected death or a pension benefit for a nonservice-connected death, and has a disability considered permanent under Section 221 (i) of the SSA.
- Receives an annuity payment under Section 2(a)(1)(iv) of the Railroad Retirement Act of 1974, and is determined eligible to receive Medicare by the Railroad Retirement Board or receives an annuity payment under Section 2(a)(i)(v) of the Railroad Retirement Act of 1974, and is determined disabled based on criteria under Title XVI of the SSA.
- Receives interim assistance benefits pending the receipt of SSI, disability-related Medicaid, or state general assistance disability.

## **Responsibilities of the Department**

The following sections explain administrative requirements for:

- [Eligibility and benefit adjustments due to changes in FIP or federal benefits](#)
- [Eligibility and benefit adjustments due to changes in federal standards](#)
- [Bilingual materials and interpreters](#)
- [The SNAP complaint system](#)
- [Confidentiality of SNAP records](#)
- [The effect of receiving SNAP on eligibility for other assistance](#)
- [Nondiscrimination in awarding benefits and the process for complaints about discrimination](#)
- [Personnel](#)
- [Records and reports on certification and benefit issuance](#)
- [Verification of SNAP benefits for the Work Opportunity Tax Credit program](#)

### **Adjustments Due to Changes in FIP or Federal Benefits**

Legal reference: 7 CFR 273.12(e)(2), (3)

When the state makes an adjustment to public assistance:

- If the Department has at least 30 days advance knowledge of the amount of the adjustment, the Department must recompute SNAP benefits to be effective in the same month as the change in public assistance.
- If the Department does not have enough notice, the adjustment in SNAP benefits must be effective no later than the month after the change in public assistance.

Typically, these adjustments are done through a mass change to the ABC system, which automatically generates notices of decision to notify households of the change.

When there is a federal benefit payment overall adjustment, such as social security cost-of-living increases, the change must be implemented no later than the second allotment after the month the change occurs. See I4-B(8), [COLA Processing](#), for more information.

If the household requests a hearing, benefits are continued at the former level only if the issue appealed is that the calculation is wrong.

### **Adjustments Due to Changes in Program Standards**

Legal reference: 7 CFR 273.12(e)

The state or federal government may initiate changes that affect all SNAP cases, such as adjustments to:

- Income eligibility standards.
- Shelter and dependent care deductions.
- The maximum SNAP allotment.
- The standard deduction.
- The utility standard.

These adjustments are implemented prospectively for all households.

### **Bilingual Requirements**

Legal reference: 7 CFR 272.4(b)

The Department must provide bilingual program information materials in the appropriate language for:

- Each project area with less than 2,000 low-income households, if approximately 100 or more of those households are of a single-language minority.
- Each project area with 2,000 or more low-income households, if approximately five percent or more of those households are of a single-language minority.
- An office that provides bilingual service as required below.

“Single-language minority” refers to households that speak the same non-English language and that do not contain adults fluent in English as a second language.

The Department must provide both certification materials in the appropriate language **and** bilingual staff or interpreters:

- In each individual certification office that provides service to an area containing approximately 100 single-language minority low-income households, **and**
- In each project area with less than 100 low-income households, if a majority of those households are of a single-language minority.

Certification materials include the SNAP application form, the reporting changes form, and notices to households.

In areas with a seasonal influx of non-English-speaking people, bilingual materials and interpreters must be provided if the number of single-language minority low-income households moving into the area during the seasonal influx meets or exceeds the requirements stated above.

## **Complaint System**

Legal reference: 7 CFR Parts 271 and 272, 44I IAC 65.16(234)

Federal regulations require a formal procedure for participants, potential participants, or concerned persons who have or have had problems resolving their concerns in dealing with the agency and choose to file a written complaint. It is not meant to preclude participants who contact the Department on a local or state level with an immediate concern or participants who do not wish to file a written report.

Complaints handled by this system do not include those that can be handled through an appeal hearing or through discrimination procedures. This complaint system is to be used when people have had problems resolving their concerns in dealing with the Department and want to file a written complaint based on unsatisfactory results.

The Department's SNAP complaint process is as follows:

1. Clients who want to file a formal written complaint about the SNAP program may file form 470-0323 or 470-0323(S), SNAP Complaint, with the Division of Field Operations. Clients can pick up forms at their local or service area office. If necessary, the complaint coordinator in the Division of Field Operations will mail out the form.
2. The complaint coordinator in the Division of Field Operations reviews the complaint forms and checks that the complaint is not appealable and not related to discrimination or fraud.

Appealable issues are referred to the Appeals Section. Discrimination reports are referred to the Diversity Programs Unit. Once the nature of the complaint is determined to be none of the above, the complaint is sent to the service area office to investigate.

3. The service area staff prepare a summary of the situation and the actions taken by the Department and give it to the complaint coordinator within 30 days of the date of the referral.

The complaint coordinator sees that a response to the client is written within three working days from receipt of the summary. When complainant is not the client, the complainant is informed in writing that the situation was investigated, but the Department cannot disclose the findings for confidentiality reasons.

4. At the end of each month, the complaint coordinator fills out form 470-0328, *SNAP Complaint Summary*, showing the number of each type of complaint.
5. The Division of Field Operations reviews the analysis of the total complaint forms received during the year. Any significant patterns of deficiencies and their causes are included as part of the state's corrective action plan.

The Division of Field Operations keeps complaints for three years from the month of response unless the complaint is about issuance. Issuance complaints are retained until the state office says that the issuance reports can be destroyed.

The system enables the Division of Field Operations to compile a report and make an analysis of certain types of complaints received by the Department. The analysis of these findings will be used to clarify program policies and procedures, improve service to applicants and participants, and provide information on patterns of deficiencies for inclusion in the State Corrective Action Plan.

Clients can also ask that FNS handle a complaint. Any complaint will be handled by FNS upon household request, unless the complainant wishes a hearing. Persons or agencies wishing to file a complaint or wanting program information from FNS may contact the FNS Regional Office.

### **Confidentiality**

Legal reference: 7 CFR 272.1(c); Iowa Code Section 217.30

Use or disclosure of information from applicant or participant households exclusively for the SNAP program is restricted to the following people:

- People directly connected with the administration or enforcement of:
  - SNAP,
  - Family Investment Program,
  - Medicaid, or
  - Any state program administered under a plan approved under the Social Security Act that is required to participate in the state Income and Eligibility Verification System (IEVS).

Release is limited to the extent that the information is useful in establishing or verifying eligibility or benefit amounts under those programs.

- People administering:
  - Social Security benefits,
  - Supplemental Security Income,
  - School Lunch,
  - Child Support,
  - Food Distribution Programs and
  - Any other federally aided means-tested program.

**NOTE:** State law limits release of information to purposes directly connected to the administration of Department programs and requires a written request and comparable standards of confidentiality.

- Employees of the Comptroller General's Office of the United States, for audit examination, upon written request.
- Any local, state, or federal law enforcement officials, upon written request, for the purpose of investigating an alleged violation of the SNAP program. The written request must include:
  - The identity and authority of the person requesting the information.
  - The violation being investigated.
  - The identity of the person on whom the information is requested.
- Any local, state, or federal law enforcement official who requests in writing information necessary in the investigation of a felony crime or a probation or parole violation. The information that can be provided is limited to the address, social security number, and any available photograph of:
  - A SNAP recipient who is fleeing to avoid prosecution, custody, or confinement for a felony crime or a violation of parole or probation, or

- A member who has information about another household member who is under investigation for a felony crime or probation or parole violation.

If the law enforcement officer provides documentation that there is a warrant for the arrest of the member for a felony, or a parole or probation violation, see 7-I, [Fleeing Felons and Parole and Probation Violators](#).

- Persons directly connected with the verification of immigration status of aliens applying for SNAP benefits, through the Systematic Alien Verification for Entitlements (SAVE) Program, to the extent the information is necessary to identify the individual for verification purposes.

Anyone authorized above to receive information must adequately protect the information against unauthorized disclosure.

A responsible member of the household, its currently authorized representative, or a person acting in its behalf, may request in writing to review the case file. Make materials available during regular business hours. Do not furnish information such as the names of persons who have given information about the household without the household's knowledge, or the nature or status of pending criminal prosecutions.

Keep information received through IEVS confidential. Release it only to:

- Persons about whom IEVS information is printed.
- The head of household.
- An authorized representative of the client who is acting on behalf of the client.
- Other state agencies administering programs participating in IEVS.
- The Department of Inspections and Appeals.

Unauthorized disclosure of information received from the Social Security Administration or the Internal Revenue Service may be punishable by \$5,000 fine, five years imprisonment, or both.

### **Social Security Numbers**

Legal reference: 7 CFR 273.6(f)

The Department is authorized to use social security numbers in the administration of the SNAP program.

To the extent determined necessary by the Secretary of Agriculture and the Secretary of Health and Human Services, state agencies have access to information regarding individual SNAP program applicants and participants who receive SSI. This information should be used to help:

- Determine a household's eligibility to receive assistance.
- Determine the amount of assistance.
- Verify information given by the household.
- Prevent duplicate participation.
- Facilitate mass changes in federal benefits.
- Determine the accuracy and reliability of information given by households.



### **Effect of Receipt of SNAP on Other Benefits**

Legal reference: 7 CFR 272.1(a)

Receipt of SNAP benefits cannot be the basis used to decrease any assistance otherwise provided to an individual or individuals.

### **Nondiscrimination Compliance**

Legal reference: 7 CFR 272.6(a)

In accordance with federal civil rights law and USDA civil rights regulations and policies, Department employees and offices cannot discriminate against any applicant or participant in any aspect of program administration on the basis of race, color, national origin, sex (including gender identity and sexual orientation), religious creed, disability, age, political beliefs, or reprisal or retaliation for prior civil rights activity.

The Department is responsible for carrying-out public notification as defined in procedures issued by the Diversity Program Unit. All offices administering the SNAP program must also prominently display the poster "...and Justice for All" provided by USDA.

The following sections give more information on:

- [Requirements for collecting data on households' racial or ethnic category](#)
- [The process for filing a discrimination complaint](#)
- [Requirements for the content and handling of complaints](#)

#### **Data Collection**

Legal reference: 7 CFR 272.6(g)

Obtain data on households by ethnicity and race. The ethnicity categories are:

- Hispanic or Latino
- Not Hispanic or Latino

The race categories are:

- White
- Black or African-American
- Asian
- American Indian or Alaskan Native
- Native Hawaiian or other Pacific Islander

Advise applicants that:

- The information is voluntary and will not affect eligibility or benefit levels.
- The reason for the information is to ensure that program benefits are distributed without regard to race, color, or national origin.

When the household chooses not to provide the information, record race and ethnicity data based on observation and your best judgment.

### **Filing a Discrimination Complaint**

Legal reference: 7 CFR 272.6(b)

People who believe that they have been subject to discrimination may file a written complaint with:

- The Diversity Program Unit, Iowa Department of Health and Human Services, 1305 E. Walnut St., 1<sup>st</sup> Floor, Des Moines, IA 50319-0114.
- Food and Nutrition Service, USDA, 1320 Braddock Place, Room 334, Alexandria, VA 22314 or fax: (833) 256-1665 or (202) 690-7442 or email: [FNScivilrightscomplaints@usda.gov](mailto:FNScivilrightscomplaints@usda.gov).

If a person expresses an interest in filing a discrimination complaint, explain both the FNS and the Department nondiscrimination complaint systems. Advise the person within ten days of the person's right to file a complaint in either or both systems. Explain what information is necessary for investigation.

### **Discrimination Complaint Requirements**

Legal reference: 7 CFR 272.6(c) and (d)

Make every effort to have the complainant provide all of the following information, to assist with investigations:

- Name, address, and telephone number or other means of contacting the person alleging discrimination.
- The location and name of the organization or office that is accused of discriminatory practices.
- The nature of the incident or action or the aspect of program administration that led the person to allege discrimination.
- The reason for the alleged discrimination (age, race, color, sex, handicap, religious belief, national origin or political belief).
- The names and titles (if appropriate), and addresses of persons who may have knowledge of the alleged discriminatory act.
- Dates on which alleged discriminatory actions occurred.

Accept complaints even if all the above information is not supplied. (However, investigations will not be conducted unless the first four items are provided.)

If a complainant makes allegations verbally and is unable or is reluctant to put the allegations in writing, document the complaint in writing.

A complaint must be filed no later than 180 days from the date of the alleged discrimination. However, the time for filing may be extended by the Secretary of Agriculture.

Complaints processed at the state level are reported to FNS. The report contains:

- As much information as is available to the state agency.
- The findings of the investigation.
- If appropriate, the corrective action planned or taken.

### **Personnel**

Legal reference: 7 CFR 272.4(a)

Only qualified merit employees can conduct the required applicant household interviews. FIP certification personnel are used to meet the interview requirements for FIP households applying for SNAP.

**Exceptions:** Volunteers and other nonmerit employees can conduct certification interviews or certify applicants for USDA-declared disaster victims. Also, see 7-B, [Joint Application Process for SSI Households](#).

Only authorized employees of the Department, and federal employees involved in the administration of the program are permitted access to issuance documents.

### **Hours of Operation**

Legal reference: 7 CFR 272.4(f)

The Department is responsible for determining the hours that SNAP offices are open. Adjust them if needed to ensure that working participants can be adequately served.

### **Volunteers**

Legal reference: 7 CFR 272.4(a)(2)

Counties are encouraged to use volunteers in activities such as prescreening, assisting applicants in the application and certification process, and securing needed verification. Volunteers are not permitted access to issuance documents.

Individuals and organizations that are parties to a strike or lockout, and their facilities, cannot be used in the certification process, except as a source of verification for information supplied by the applicant.

## **Records and Reports**

Legal reference: 7 CFR 272.1(e), (f)

The SNAP office must keep records and submit reports and other information as required by FNS.

Certification records must be available for review or audit by FNS or by the Department for a period of three years from the month of origin of the record. **In addition:**

- All fiscal records and accountable documents must be held for three years from the date of closure.
- Documents which support the establishment of the claim, including calculations and supporting documentation, must be retained for three years after the claim is **paid off**.
- Case records relating to IPVs must be retained until you receive reliable information that the subject has died, or until advised by FNS that the record may be permanently removed from the disqualified recipient database.

Certification records must include:

- Applications for certification or subsequent certification.
- Required FNS or Department forms.
- Worksheets used in the computation of income for eligibility and the basis of issuance documentation, including verification techniques employed by the worker.
- Copies of notices of adverse action and other notices sent to the client and the client's responses.
- Documentation of actions related to the fair hearing process.
- Fiscal adjustment, including claims, refunds, and credits for lost benefits.
- Any other data that affects a household's eligibility or basis of issuance.

Issuance records are all records and reports that relate to cash and SNAP accountability, and must be retained until the Bureau of Operations Services advises that the records can be destroyed.

## **Public Information**

Legal reference: 7 CFR 272.1(d)

Federal regulations, federal procedures, corrective action plans, and the state plan of operation must be available upon request for examination by members of the public during office hours at the central office. Also, copies of the Employees' Manual must be available for examination upon request at each local office and the central office.

### **Program Informational Activities**

Legal reference: 7 CFR 272.5(a), (b), 272.6(f), 273.2(c)(4), FNS Instructions I 13-1

“Program informational activities” are those activities that convey information about the program (including household rights and responsibilities) to applicant and participant households through publications, telephone hot lines, and face-to-face contacts. This includes information about eligibility, benefits and services, the location of offices, and hours of service.

All offices must display:

- The nondiscrimination poster “And Justice for All,” or a similar FNS-approved poster.
- Signs that explain application processing standards and the right to file an application on the day of initial contact.

All offices shall encourage program participants to participate in the Expanded Food and Nutrition Education Program (EFNEP). Offices should allow EFNEP personnel to distribute informational materials and speak with customers at the local office.

### **Work Opportunity Tax Credit**

Legal reference: P.L.104-188, as amended by the Taxpayer Relief Act of 1997 (Public Law 105-34) under Section 51 of the Internal Revenue Code.

The Work Opportunity Tax Credit (WOTC) is designed to help people move from economic dependency to self-sufficiency by encouraging employers in the private sector to hire from targeted groups of job seekers with significant barriers to employment.

Iowa Workforce Development (IWD) administers WOTC. IWD verifies eligibility and issues certifications to employers. DHS shares eligibility and program participation information electronically with IWD. Refer all employer and recipient requests for WOTC eligibility verification to IWD.

## **Electronic Benefit Transfer**

Legal reference: 7 CFR 274, 44I IAC 65.4(234)

All SNAP households receive benefits through Electronic Benefit Transfer (EBT).

This section explains procedures for:

- [Interstate interoperability of EBT systems](#)
- [Authorizing SNAP](#)
- [Providing access to the food account](#)
- [Establishing cardholders](#)
- [Replacing EBT cards](#)
- [Handling EBT cards returned to the local office](#)
- [Handling reapplications from cardholders](#)
- [Deactivating an EBT card](#)
- [Handling changes in household composition when cards need to be deactivated or issued](#)

### **EBT Card Interoperability**

Legal reference: 7 CFR 274.8

“Interoperability” means SNAP benefits issued to an EBT recipient can be redeemed in any state. All retailers must be authorized by FNS to accept SNAP. The Iowa EBT card meets the requirements that allow it to be used in all places that accept SNAP anywhere in Iowa and in other states.

### **Authorizing SNAP**

Legal reference: 7 CFR 274.2

When an application is approved for SNAP, ABC entries transmit the authorization to the EPPIC® system twice each business day. ABC entries approved prior to 9:50 a.m. are transmitted to EPPIC at 10:00 a.m. ABC entries approved after 9:50 a.m. transmit overnight. Upon receipt of the authorization, EPPIC® sets up an EBT SNAP account for the household. The EBT account is permanently established in EPPIC®, and is connected to the specific ABC case number under which the application is approved.

If a SNAP case is closed and reopened under the same case number, the ABC entries to reopen the case will authorize a deposit of SNAP to the same account as was initially established for that case number. See [Changes in Household Composition](#) for guidance on managing household composition changes and cardholders on accounts.

The only way to open a new account is to establish a new ABC case number. A new account may be needed if the original household is not intact and benefits are still available in the original account at the time a reapplication is approved.

The SNAP account does not close when the SNAP case closes. Cardholders can continue to use the account until benefits are exhausted. Once benefits are exhausted, the account remains open indefinitely on the EPPIC® system. Only DHS central office staff has the authority to close an account on EPPIC®.

### **Providing Access to the SNAP Account**

Legal reference: 7 CFR 274.2

An Iowa EBT card is used to access the SNAP account. ABC entries to approve a new SNAP case will initiate the mailing of an Iowa EBT card to the primary cardholder authorized on the account. EPPIC® entries are required to issue replacement cards for the primary cardholder, or to issue any cards to secondary cardholders or authorized representatives. See policies in this chapter for when entries may or should be made directly to EPPIC® to establish a cardholder.

Each Iowa EBT card is issued to a specific individual, and has its own unique PAN and is permanently connected to a SNAP case. The card cannot be connected to a new SNAP account. The PAN identifies who the cardholder is, and identifies which card made transactions on the food account.

A new Iowa EBT card is not issued for each monthly allotment of SNAP. All cards are valid until 2049 unless deactivated. If a cardholder still has the card, the card is still active, and the cardholder is reapproved for SNAP, the cardholder can access the assistance as soon as it becomes available.

Cardholders are discouraged from allowing others to use their Iowa EBT cards to buy food for the household. However, there is no penalty for doing so. SNAP used from an account cannot be replaced. EXCEPTION: See [7-H](#) for when a household can appeal a request for replacement.

Selling or trading an EBT card is an illegal activity. If there is an indication that a cardholder sold or traded the Iowa EBT card, see [Handling Complaints of Trafficking](#) in this chapter.

### **Mailing EBT Cards**

The EBT contractor mails all Iowa EBT cards on an EBT account to the household's address as entered on ABC/EPPIC. Cards issued to secondary cardholders and authorized representatives are entered in EPPIC only. If the authorized representative does not live at the household's address, it is the responsibility of the primary cardholder, not the Department, to give the authorized representative the card.

EBT cards are mailed within one business day following the ABC batch process that authorizes the card. Cards are mailed on business days. Consider the batch process, mailing time, and weekends or holidays when determining system entry dates to ensure timely processing of a case.

A household may move or visit out of state and need a new card mailed to them. Cards may be mailed to an address anywhere in or out of the state, as the household desires.

### **SNAP Availability Dates**

Legal reference: 441 IAC 65.4(234)

SNAP issued on an uninterrupted monthly schedule is issued on the same date each month even if the date falls on a weekend or a holiday. SNAP availability dates are based on the first letter of the last name of the person who is the ABC case name. Availability dates are listed on the following chart:

<b>Monthly SNAP Availability Schedule</b>	
<b>First Letter of Last Name</b>	<b>Date Benefits Are Deposited</b>
A – B	1st day of the month
C – D	2nd day of the month
E – G	3rd day of the month
H – I	4th day of the month
J – L	5th day of the month
M – O	6th day of the month
P – R	7th day of the month
S	8th day of the month
T – V	9th day of the month
W – Z	10th day of the month

### **Establishing Cardholders**

Legal reference: 7 CFR 274.8 441 IAC 65.4(234)

Establishing who will be a household's cardholders is the first step to take when preparing to issue SNAP. There is no age requirement for who can receive an Iowa EBT card. If the household wants more than one card, it is entitled to them. A maximum number of three EBT cards can be active on an EBT account at any one time.

The requirements under [Establishing a Secondary Cardholder or Authorized Representative](#) must be met for a second or third person to receive an Iowa EBT card. Two cardholders' information can be entered in EPPIC®.

The primary cardholder is established through entries to IABC. Secondary cardholders and authorized representatives are established in EPPIC®.

When opening a SNAP case or making changes because the household composition changed, make sure you intend to replace the current cardholders. If you do not wish to replace a current primary cardholder, remember that overwriting the current primary cardholder's information in ABC will deactivate the current primary cardholder's EBT card.



The following sections give more information on:

- [The primary cardholder](#)
- [The secondary cardholder](#)
- [Authorized representatives](#)
- [Establishing secondary cardholders or authorized representatives](#)
- [Removing secondary cardholders or authorized representatives](#)

### **The Primary Cardholder**

The person who is established as the ABC case name is the primary cardholder. To prepare to set up your case, ask at the application interview who does the household's primary grocery shopping. Establish the primary grocery shopper as the ABC case name. Document in the case record the household's choice of grocery shopper.

Tell the person interviewed:

- The grocery shopper will receive the Iowa EBT card in the shopper's name and is the only one who should use it.
- If SNAP is lost (misused) or stolen from an EBT food account, the assistance will not be replaced. EXCEPTION: See [7-H](#) for when a household can appeal a request for a replacement.

EBT follows the same rules that apply to credit cards and bank debit cards. The card owner signs the back of the card.

Generally, only the primary cardholder can add more cardholders to the household's food account. See [Emergency Authorized Representative](#) for exceptions.

If the primary cardholder leaves the home and the remaining household members still want benefits, you will need to determine how to handle the separation on a case-by-case basis depending on the circumstances of the household(s).

### **Undocumented Aliens and Other Ineligible Members**

Legal reference: 7 CFR 273.2(n)(1)(i)

A person does not have to be eligible to receive SNAP with the household to receive an EBT card. When the only adult household member is an ineligible member, issue the Iowa EBT card to that member. If there is more than one ineligible adult, issue the card to the person who is the primary grocery shopper.

If the ineligible person is established on ABC as the case name and coded according to the instructions in [14-B-Appendix](#), issue the Iowa EBT card through normal system entries.

### **Secondary Cardholders**

A household may have more than one person who shops for groceries. A secondary cardholder is a member of the SNAP household authorized to receive an EBT card. The person can be an eligible or ineligible member.

Do not refuse requests for additional cardholders. However, the household should clearly understand that only a responsible person should be designated to receive an Iowa EBT card on the household's account.

See the policy [Authorized Representative](#) when a primary cardholder requests a person outside of the SNAP household as a cardholder on the household's account.

When a primary cardholder asks for additional EBT cards on the household's account, see the policy [Establishing a Secondary Cardholder or Authorized Representative](#). No card can be issued until the requirements of this policy are met.

### **Authorized Representative**

Legal reference: 7 CFR 273.2(n)

The household's primary cardholder may designate one or more authorized representatives to act on behalf of the household to:

- Apply for SNAP benefits, including applications for recertification.
- Receive an Iowa EBT card to use to buy food for the household.

The household may designate a separate authorized representative for each of these activities, or may designate a single authorized representative for all activities.

When a household asks for an authorized representative on the application form, ask if the household wants the authorized representative to receive an EBT card. If a household wants an authorized representative to receive an Iowa EBT card to use on the household's account, the primary cardholder must make the request in writing. See [Establishing a Secondary Cardholder or Authorized Representative](#).

When a household wants an authorized representative only to handle the household's business with DHS, inform the household that it is liable for any overissuance that results from wrong information given by the authorized representative. Do not issue an EBT card when the authorized representative's responsibilities are limited to handling business for the household with DHS.

The Department is required to assist households in obtaining an authorized representative to purchase the household's food when the household needs one but does not know someone to act in that capacity.

Always document the name of the authorized representative in the case record.

### **Who Cannot Be an Authorized Representative**

Legal reference: 7 CFR 273.2(n)(4)(ii)

The following cannot be authorized representatives:

- Department employees involved in the certification or SNAP authorization process (unless the service area manager approves the designation in writing).
- Retailers authorized to accept SNAP (unless the service area manager approves the designation in writing).
- Homeless meal providers.
- People disqualified for fraud. People who are disqualified for fraud cannot be authorized representatives during the period of disqualification.

**EXCEPTION:** If the disqualified person is the only adult member of the SNAP household who can shop for food, and there is no one outside the household available who can be the authorized representative, the disqualified person can serve as an authorized representative. See [Undocumented Aliens and Other Ineligible Members](#).

### **Person Representing Multiple Households**

Legal reference: 7 CFR 273.2(n)(4)(ii)

An authorized representative is not limited in the number of households that the person can represent. If a single authorized representative is responsible for a large number of households, or if an employer is the authorized representative for migrants or seasonal farm workers, make sure that:

- The household has freely requested the assistance of the authorized representative.
- The household circumstances are correctly represented, and the household is receiving the correct amount of benefits.
- The authorized representative is properly using the SNAP.

### **Households That Have Guardians, Conservators or Payees**

Households may have financial caretakers (guardians, conservators or protective payees) for different reasons. Having a financial caretaker does not automatically mean the caretaker should receive an Iowa EBT card on the household's account.

Unless the household is incompetent to the degree that it cannot handle its affairs, or shop using EBT technology, the caretaker may not receive a card unless authorized by the primary cardholder.

- If a household has an organization as its financial caretaker and wants or legally must have an authorized representative to buy the household's food, the organization must name a person to act as the authorized representative. A **person** must receive the Iowa EBT card.

- If the household is not legally required to, but wants the financial caretaker as an authorized representative the primary cardholder must ask in writing. See [Establishing a Secondary Cardholder or Authorized Representative](#).

### **Emergency Authorized Representative**

When an emergency prevents all of the cardholders on an EBT account from shopping for the household, an emergency authorized representative may need to be established; see instructions in [14-J](#) for adding a secondary cardholder.

It is not necessary for the household to complete the process under [Establishing a Secondary Cardholder or Authorized Representative](#) in an emergency. The primary cardholder can name the emergency authorized representative in writing or verbally.

If the emergency is such that the primary cardholder cannot designate an emergency authorized representative, someone else in the household may do so. If you designate an emergency FIP payee, also designate that person as the emergency authorized representative for SNAP.

If the primary cardholder who is the only adult in the home dies, an emergency cardholder may use the benefits for the remaining household members. See 7-G, [Treatment of Remaining Household Members When Acting on Prisoner or Death Matches](#) for how to act on these cases.

### **Establishing a Secondary Cardholder or Authorized Representative**

This policy does not apply to:

- Emergency authorized representatives.
- Households living in a facility.

If a household asks on the SNAP application (or in some other way) for an authorized representative to buy food for the household, tell the person who is interviewed that:

- The authorized cardholder will have complete access to all of the SNAP benefits in the household's account.
- The Department will not replace benefits used by the authorized cardholder.
- The primary cardholder must ask in writing by fully completing form 470-3983, *Adding an EBT Cardholder*. The form must be:
  - Signed by both the primary cardholder and the secondary cardholder or authorized representative, and
  - Returned to the DHS local office.

Upon receipt of the completed form, issue an Iowa EBT card to the authorized cardholder.

### **Replacing Secondary Cardholders or Authorized Representatives**

A primary cardholder can change authorized representatives or secondary cardholders at any time. Do not issue a card to the newly requested cardholder until the requirements under [Establishing a Secondary Cardholder or Authorized Representative](#) have been met.

If the primary cardholder wants the original cardholder to stay in place until the new cardholder is established, deactivate the original cardholder's Iowa EBT card when you put the new cardholder in place.

### **Authorized Representative's Request to Terminate**

An authorized representative has the right to end the person's agreement to represent a household at any time. The authorized representative can deactivate the representative's own card by calling the EBT customer service number or by calling DHS.

If the authorized representative asks DHS to be removed as a cardholder, deactivate the person's card through EPPIC® entries.

If the household is not aware of the authorized representative's decision to stop representing the household, send a note to the household to ask if the household wants to designate a new authorized representative. Send the household a new form 470-3983, *Adding an EBT Cardholder*, in case the household needs a new authorized representative.

### **Disqualifying an Authorized Representative**

Legal reference: 7 CFR 273.2(n)(4)(i)(C)

Disqualify an authorized representative who knowingly gives false information or improperly uses SNAP for up to one year. (This provision does not apply to facility authorized representatives.)

At least 30 days before the disqualification begins, send a written notice to the affected household and to the authorized representative. Include in the notice:

- The proposed action.
- The reason for the proposed action.

The household's right to request a hearing.

## **Replacement EBT Cards**

There is no charge to the cardholder for replacement Iowa EBT cards and no limit on the number of replacements a cardholder can have. A cardholder can request a replacement card from the EBT customer service or from DHS. Do not refuse requests for a replacement card. If a cardholder requests a replacement, do not refer the cardholder to the EBT customer service to request the replacement card.

EBT customer service uses the information displayed on the EPPIC® system to verify a cardholder's identity. If a cardholder gives customer service information different than the information on EPPIC®, customer service will not replace the card. Example:

1. Household A has recently moved to another county. The cardholder gives customer service the new address when requesting a replacement card. DHS has not yet received or updated the address, so the information given by the cardholder and EPPIC® do not match. Customer service deactivates the lost or stolen card and refers the cardholder to DHS to get a replacement card.
2. Same as example 1, except that the household moves to Illinois. The response is the same. There is no prohibition against mailing EBT cards out of state.

If the SNAP case is open, update the information in ABC to reflect household changes. Issue a replacement card through EPPIC® entries.

ABC cannot be used to update information on EPPIC® when the SNAP case is closed. If the case is closed, update the information on ABC as appropriate. At the same time, update the information directly in EPPIC®. Issue the replacement card through EPPIC® entries.

## **Returned EBT Cards**

Envelopes used to mail the EBT cards are printed with the return address of the EBT Contractor. Cards that are undeliverable will be returned to the EBT contractor and destroyed. The EBT contractor is responsible for handling the disposition of EBT cards returned to the EBT contractor. The DHS central office is responsible for handling the disposition of EBT cards returned to central office.

### **EBT Cards Returned to the Local Office**

If someone other than law enforcement returns an Iowa EBT card, accept the card. See [Law Enforcement Returns a Card or Inquires About a Cardholder](#) if a law enforcement officer returns a card.

It is not necessary to write a receipt when an EBT card is received in a local office. Check the status of the card on EPPIC®. If the card is still active, cancel and destroy it.

### **Law Enforcement Returns a Card or Inquires About a Cardholder**

Legal reference: 7 CFR 272.1(c)(1)(vi);(vii)

Law enforcement may come into possession of an EBT card in various ways. An EBT card could be found at or near the scene of a crime. Another person's EBT card could be in the possession of a person detained by law enforcement or found on a crime victim.

Law enforcement may request information about the cardholder or request the name of the cardholder. You cannot provide law enforcement with the name of a cardholder.

See [Confidentiality](#) for details about what information DHS can share with law enforcement. If a request from law enforcement exceeds the limits set under [Confidentiality](#), refer the officer to the Department of Inspections and Appeals.

If a law enforcement officer surrenders an Iowa EBT card to DHS, accept the card. Do not destroy the card.

If the card was returned as found, and it is not connected to a criminal investigation, follow the procedures under [EBT Cards Returned to the Local Office](#).

If law enforcement indicates that the card is connected to a criminal investigation, immediately place the surrendered card in an envelope addressed to Chief, DIA Investigations Division, 3rd Floor, Lucas Building, 321 E. 12<sup>th</sup> Street, Des Moines, IA 50309-0083.

Include a note with the card stating that law enforcement returned the card, when the card was returned, who returned it and any other pertinent information that may be of assistance to DIA should law enforcement contact them for information about the cardholder. Immediately place the sealed envelope in the outgoing mail.

### **Reapplications for SNAP**

If a household reapplies and you use the household's original ABC case number to act on the application, check to see if the same person is the household's grocery shopper. If so, and the person still has an active Iowa EBT card, do not issue another card. Issuing a new card will deactivate the card the person still has.

If the cardholder does not know if the card is active, check the card's status in the EPPIC® system. If the card is active, the cardholder can access the SNAP the morning after the ABC batch is passed to EPPIC® or when the benefits become available if held for later release.

If the same secondary cardholder or authorized representative still has an active card, do not issue another card. A new *Adding an EBT Cardholder*, form 470-3983, is not needed. Have the primary cardholder initial and date the original form to authorize leaving the second cardholder in place.

### **Deactivating an Iowa EBT Card**

A cardholder can deactivate the cardholder's own card using EBT customer service or can ask DHS to deactivate the card.

Immediately act on all requests from a cardholder to deactivate a lost, stolen, or damaged Iowa EBT card. Also, immediately act on a primary cardholder's request to deactivate a secondary cardholder's or authorized representative's card. The request to deactivate a card does not need to be in writing.

Use EPPIC® to deactivate the card, and issue a replacement if appropriate for the situation.

Never delay deactivating a card that is missing. The Department is liable for loss of SNAP from the time of the report of the missing card until it is deactivated. Do not refer someone back to the EBT customer service if the person calls DHS first to report a missing card. Deactivate the card through EPPIC® entries. Advise the person to call the EBT customer service right away the next time it happens.

If a cardholder leaves a voice mail message requesting the deactivation of a card, immediately upon retrieval of the voice mail, check EPPIC® to see if the card is still active. Do not assume that because the caller did not reach a person to ask for the deactivation that the caller took action to deactivate the card through EBT customer service. Deactivate the card through EPPIC® entries and issue a new one if appropriate.

Document the request for deactivation of the card, including the date of the request and the date and time the request was acted on.

EPPIC® tracks the date and time that cards are deactivated. Benefits accessed before the request to deactivate a card cannot be replaced. However, if a request is not timely acted on, benefits used by the secondary cardholder or authorized representative or a person who has unauthorized possession of a card during the delay may have to be replaced at the Department's expense. See 7-H, [Request for Replacement of SNAP](#).

An Iowa EBT card that is deactivated cannot be reactivated. If a cardholder finds a card that was reported as lost or stolen, it will not work.

### **Changes in Household Composition**

Changes in a household's circumstances may affect who should continue to have access to the household's SNAP account. Changes in who should be a cardholder on a SNAP account need to be addressed on a case-by-case basis.

Follow normal policy when determining who is removed from the case and who will retain the case. If some members will retain the case for another program's benefits, those members should also retain the SNAP case. It also may be necessary to close the existing SNAP case and open new cases for newly created households.



### **When a Household Splits Up**

It is up to the household to decide how to share the SNAP that was issued for the month in which the household split. If timely notice prevents removing members from a household until the following month, it is up to the household to decide how to share the assistance issued before members are removed.

If the primary cardholder is one of the members who will be removed from the case, a new head of household will be established on ABC. Issue an Iowa EBT card to the household's new primary cardholder. Issuance of a card to the new primary cardholder will automatically deactivate the original primary cardholder's card.

If the primary cardholder will retain the SNAP case, deactivate all Iowa EBT cards belonging to the members who will be canceled from the case.

### **Primary Cardholder Becomes Ineligible for SNAP**

A cardholder's EBT card is still active even if the cardholder becomes ineligible for SNAP benefits and is removed from the case. Eligibility for benefits is not a consideration for determining who can be a cardholder. Do not deactivate a cardholder's card simply because the cardholder becomes an ineligible member.

## **Participant Use Of Benefits**

The following sections explain:

- [What SNAP can be used for](#)
- [Where SNAP can be used](#)
- [Penalties for misusing SNAP benefits](#)
- [Handling complaints of trafficking](#)

### **What SNAP Can Be Used For**

Legal reference: 7 CFR 271.2

SNAP can be used to buy all types of foods that are sold to be eaten at home. This includes snack foods, candy, ice, nonalcoholic beverages, soft drinks, and their bottle deposits. Tax cannot be charged on anything bought with SNAP.

SNAP can be used to buy meals served by meal providers if the meal provider is authorized to do so by FNS. Plants and seeds used to grow food can be purchased with SNAP.

SNAP cannot be used to buy foods that are already hot at the point of sale, foods meant to be eaten while the person is still in the store, vitamins, medicines, dietary supplements, pet foods, or any other nonfood item.

### **Where SNAP Can Be Used**

Legal reference: 7 CFR 274.10(a-e), 278.1

SNAP can be used at any FNS-authorized retailer. Retailers that accept SNAP will display a sign. Retailers that may be authorized by FNS include:

- Bakery outlets
- Communal dining facilities
- Congregate meal sites
- Convenience stores
- Farmers markets
- Food cooperatives
- Grocery stores
- Group living arrangements
- Health food stores
- Meals on Wheels
- Meat markets
- Private nonprofit organizations or institutions providing drug and alcoholic treatment and rehabilitation programs

- Public or private nonprofit shelters that serve the homeless
- Roadside vendors
- Route sales
- Shelters for battered women and children
- Specialty stores such as pizza stores that prepare food to bake at home
- Stores that have food departments

### **Retailers Wanting to Accept EBT**

Legal reference: 7 CFR 274.3

If a retail food store or other food vendor or provider asks about becoming authorized to accept SNAP, direct the establishment to the USDA website.

### **Penalties for Misusing SNAP**

**Legal reference:** 7 CFR 271.5(a), (b) and (c); Sections 15(b) and (c) of the Food and Nutrition Act

Pursuant to Section 15(d) of the Food and Nutrition Act, the value of benefits provided through the SNAP program are an obligation of the United States within the meaning of 18 United States Code (USC) 8. The provisions of Title 18 of the United States Code, "Crimes and Criminal Procedure," relative to counterfeiting, misuse and alteration of obligation of the United States are applicable to EBT.

Per federal law, any unauthorized issuance, redemption, use, transfer, acquisition, alteration, possession, or presentation of coupons or authorizations to purchase food may subject any individual, partnership, corporation, or other legal entity to prosecution under Sections 15(b) and (c) of the Food and Nutrition Act or under any other applicable federal, state or local law, regulation or ordinance.

People found guilty of an offense may be subject to fines and/or imprisonment. In addition to fines and imprisonment, the court may suspend any persons convicted of a felony or misdemeanor violation under either section from participation in the SNAP program for an additional period of up to 18 months.

### **Handling Complaints of Trafficking**

Under federal law, trafficking is the buying, stealing, or selling of EBT cards. This includes trading benefits for firearms, ammunition, explosives, controlled substances, or anything other than eligible food.

If you receive a complaint regarding selling, buying, or trading of EBT cards, refer the complaint to DIA using form [470-5130, DHS Investigative Referral to DIA](#).

## **Participants In Drug and Alcohol Treatment Centers, Battered Women and Children Shelters, Homeless Shelters, or Group Living Arrangements**

Legal reference: 7 CFR 273.11(e)(f)(g)(h)

People residing in the following types of centers may be eligible for SNAP:

- An approved drug or alcohol treatment program, and their children.
- An approved shelter for battered women and children.
- A public or private non-profit shelters for homeless persons.

The special procedures in this section for residents in shelters for battered women and children apply to persons living in private or public non-profit residential facilities that usually serve meals.

Shelters that do not serve meals as part of their normal services are not classified as institutions, and may participate in SNAP as individual household units or as part of a group of individuals like any other household. They are not subject to the provisions described in this section.

### **Facility as Authorized Representative**

Residents, and their children, of drug/alcohol treatment centers apply for, purchase, and use SNAP benefits with the facility acting as their authorized representative. Facility residents who are not regularly participating in a drug/alcohol treatment/rehabilitation program are not eligible under this provision to participate.

Residents in shelters for battered women and children may apply for benefits, receive EBT cards, and use the allotment on their own behalf. The facility does not have to be the authorized representative, unlike drug/alcohol treatment centers.

Homeless households may use their benefits to purchase prepared meals from homeless meal providers. Homeless meal providers may not act as authorized representatives for homeless recipients.

### **Approved Centers**

Residents of drug or alcohol treatment and rehabilitation centers may be eligible for SNAP, regardless of whether or not the facility is an authorized retailer. If the center is an authorized retailer, no further verification of the facility's licensing is required.

If the center is not an authorized retailer, you must ask for verification that the facility is a nonprofit organization. If the facility is nonprofit, a current, valid Internal Revenue Service exemption must be provided for verification. Normally, the licensing agency determines the nonprofit status of the facility and this determination can be used as verification.

Shelters for battered women and children must be public or private nonprofit residential facilities that serve battered women and children. If a facility serves other persons, part of the facility must be set aside on a long-term basis to serve only battered women and children.

To be eligible while living here, the center must either:

- Be an authorized retailer, or
- Have a status as a nonprofit organization. If they do, they should have a current certificate from the IRS.

Shelters for the homeless must be approved (licensed/certified) by an appropriate State or local agency or must be authorized by FNS as a retail food store. Such meal providers must be public or private nonprofit organizations as defined by the IRS and must serve meals that include food purchased by the provider.

### **Processing Participant Applications**

Normal processing standards for eligibility decisions, acting on reported changes, and normal verification and documentation requirements apply to residents of these centers. For residents who meet emergency service criteria, you must ensure benefits are available no later than the seventh calendar day after the application date.

In addition to the normal processing standards, residents of these centers have the additional considerations listed below:

- Residents of treatment centers, if otherwise eligible and have no children residing in the center with them, must be certified for program participation as one-person households. If the child(ren) of the resident resides in the treatment center with them, the child(ren) must be certified as household member(s) in the resident's household.
- Residents of battered women and children shelters may apply on their own or use the shelter or other person as an authorized representative.

These shelter residents may have left a household that includes the person who abused them. The former household may already be certified for benefits and its certification may be based on a household size that included the woman and children who left. An application from a shelter resident who received benefits as a member of their former household may be certified as a separate household. The allotment would be based on the new household size.

You must take action to ensure those household members are removed from the former household's benefits.

### **Special Conditions for Drug and Alcohol (DAA) Treatment Centers**

When an individual residing at a DAA applies for SNAP, the application and benefits should be handled as follows:

- The center must apply on behalf of the residents
- The center must receive the EBT card and training
- The center may buy and prepare food for eligible residents on a group basis, or buy meals delivered to the individual residents
- Both the resident and authorized representative should sign the application form

- The facility acting as authorized representative is liable for any misrepresentation or fraud which it knowingly commits in the certification of participants it is representing. Therefore, the facility must be knowledgeable about household circumstances and should review those circumstances with the participants before applying for benefits on the participants' behalf. The facility is responsible for:
  - Reporting required changes in participants' circumstances
  - All losses or misuse of benefits held on behalf of participants, and
  - All over-issuances which occur while the participant is a resident of the facility.

Staff should report incidents of suspected misuse or misappropriation of benefits to central office staff for follow up with USDA. If the facility is disqualified by USDA as a retailer, or loses its license or certification, it may not serve as an authorized representative.

### **Residents Leaving DAAs**

DAAs that have the household's EBT card must provide departing residents with their EBT card. If the resident leaves the center prior to the 16<sup>th</sup> of the month, the center must ensure that the household has at least one half of its monthly allotment available in the account.

If the household leaves without notifying the facility, the facility must send the household's EBT card to DHS Central Office.

By the 5<sup>th</sup> of each month these treatment centers are required to email a list to Central Office of:

- Current residents and
- Residents who left the center in the past month.

Central office distributes these changes to local offices for appropriate follow-up with the household regarding changes to their situation such as address, shelter and utility expenses, and household composition.

## **Group Living Arrangements**

Legal reference: 7 CFR 273.11(f)

Residents of a group living arrangement may qualify for SNAP only if:

- The facility is a nonprofit agency that is licensed under regulations issued under section 1616(e) of the Social Security Act (or comparable standards) to serve no more than 16 total residents under a single license or certification, and
- The resident either is disabled or is a veteran or a surviving spouse of a veteran, as described below.

The only Iowa facility authorized as a group living arrangement is Mainstream Living in Des Moines. If a facility claims to be authorized as such, contact SPIRS.

### **Residents of Group Living Arrangement**

After moving into a group living arrangement, a participant can continue to receive SNAP without an authorized representative if mentally and physically able to conduct business. If the facility determines that the person is mentally or physically incapable of handling the person's own affairs, the resident can continue to receive SNAP with a facility authorized representative.

Residents of group living facilities may apply for SNAP:

- For themselves, if the facility says they are physically and mentally able to handle their own affairs, or
- Through an authorized representative of their choosing, or
- Through a facility employee designated to act as the authorized representative for residents who are physically or mentally unable to apply for themselves. When the facility employee applies on behalf of a resident, the facility has determined the resident cannot apply independently.

A resident of a group living arrangement is always considered as a household of one when an employee of the group living arrangement is the resident's authorized representative. This is true even when the group buys and fixes food together.

If residents **are not** certified using the facility's employee as an authorized representative, the resident's household size is determined according to the policies in 7-C, [Household Composition](#).

### **Residents Who Do Not Use a Facility Authorized Representative**

When the resident uses an authorized representative that is **not a facility** employee the resident may:

- Receive the EBT card; or
- Request that the authorized representative receive an EBT card or
- Receive an EBT card and also request one for the authorized representative

### **Facility Responsibilities and Authorized Representatives**

It is the responsibility of the facility to:

- Appoint employees to act as authorized representatives for residents.
- Monitor facility employees to ensure that no resident's SNAP is misused.

When a resident must have a facility employee to act as the resident's authorized representative, or chooses to use the facility authorized representative, the facility authorized representative must:

- Complete and sign the SNAP application.
- Report to DHS any changes in certified residents' circumstances according to the residents' reporting requirements.
- Report the loss of an EBT card immediately
- Report any overissuance or misuse by facility employees of a resident's SNAP within ten days of occurrence.

The authorized representative or designated employee can use a resident's SNAP only for:

- Buying food for the resident.
- Buying delivered meals for the resident.
- Buying food to be served to the resident.

### **Use of SNAP**

Group living arrangements are responsible for monitoring facility employees' actions in handling residents' SNAP when a facility employee is the residents' authorized representative.

When the facility employee is chosen by the resident or is required to be the resident's authorized representative:

- The facility can allow the residents to have and use their own EBT cards. The facility staff can assist residents in using their own cards. This option may be preferable for facilities that take residents on outings and help them shop for items of their choosing.
- The facility authorized representative can designate the resident's counselors, caretakers, or attendants to use the resident's own card and PIN for the resident. This option may be preferable for facilities that have residents who occasionally can go shopping or can demonstrate food likes and dislikes.
- The authorized representative can choose to receive a card on a resident's EBT account. With this option, do not also issue EBT cards to the residents in this situation unless the authorized representative requests it.

This option may be preferable for facility residents who are not able to go on facility initiated shopping trips or can't indicate food preferences so staff can shop for special items for them.



### **Resident Moves Out**

When **any** resident receiving SNAP moves out of the facility, the facility authorized representative must:

- Notify DHS immediately; and
- Make the recipient aware of the reporting requirements for the program.

When a facility-designated authorized representative has their own EBT card to purchase food to be served to the resident, the authorized representative must return that EBT card to the local DHS office within three working days of the date the resident left.

Residents are entitled to the following amount of SNAP when they leave the facility:

- When a resident leaves before the 16<sup>th</sup> of the month, the resident is entitled to:
  - At least one-half of the allotment issued for that month, or
  - All of the unspent SNAP if less than half has been spent.
- When a resident's allotment was issued as a combined allotment, and the resident leaves before the start of the second month, the resident is entitled to all of the second month's SNAP. Examples:

1. Resident A receives \$141 for April's allotment. Resident A moves out of the facility on April 14. Resident A's EBT account must have at least \$70.50 left on the day of departure.
2. Resident B receives a combined allotment of \$70 for March and \$141 for April. Resident B moves out of the facility on April 12. Resident B's EBT account must have at least \$70.50, one-half of the April assistance ( $\$141 \div 2 = \$70.50$ ), left on the day of departure.
3. Resident C receives a combined allotment of \$70 for March and \$141 for April. Resident C moves out of the facility on March 29. Resident C's EBT account must have at least \$141 (the entire amount of the April allotment) left on the day of departure. Also, any portion of the March allotment that was not accessed before the resident's departure must remain in the account.

## **Management Evaluation**

Legal reference: 7 CFR 275.2 and 275.5

Management evaluation reviews are conducted to measure compliance with state manual policy, the SNAP state plan of operation, and any other USDA approved SNAP plans. The Management Evaluation Unit is a part of the Division of Field Operation in the Bureau of Quality Improvement.

The objectives of management evaluation as identified in regulations are to provide:

- A systematic method of monitoring and assessing program operations by service area.
- A basis for service areas to improve and strengthen program operations by identifying and correcting deficiencies.
- A continuing flow of information between the service areas, central office, and FNS, necessary to develop the solutions to problems in program policy and procedures.

Federal regulations require that state agencies conduct reviews in a manner that will best measure project areas' compliance with each program requirement. Review procedures must be adequate to identify problems and the causes of those problems. Because the operational structure of each service area may differ, the procedure used to review these areas may also differ.

### **Local Office Responsibilities Relating to Management Evaluation**

Legal reference: 7 CFR 275.5

The local office shall:

- Respond to data and case sampling requests.
- Make required adjustments, if any, to individual cases under corrective action.
- Submit a corrective action plan through the service area manager in response to the management evaluation report and recommendations. The corrective action plan will:
  - Describe corrective actions already taken and corrective actions planned for deficiencies cited in the management evaluation report.
  - Give time frames for any actions still to be implemented.

Management evaluation staff then reviews the response and requests further information or action when appropriate.