Health and Human

Employees' Manual Title 7, Chapter B

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SNAP Application Processing

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Overview

To apply for Supplemental Nutrition Assistance Program (SNAP), a household must file and complete an application, be interviewed, and verify certain information. This chapter covers the mechanics of the application process, emergency service, and processing standards. This chapter also provides information on authorized representatives, household reporting methods, and verification requirements.

Filing a SNAP Application

Legal reference: 7 CFR 273.2(a)-(c), 441 IAC 65.2(234)

Anyone can apply for assistance from the Department of Health and Human Services (HHS). The application process starts when a person files a valid application in an HHS local office. A valid application has a name, address, and signature.

Households can file an application at any HHS local office in lowa. Households can apply either in person, through the mail, by fax, or electronically. Applications that are filed electronically or that are signed and then are faxed or are scanned and e-mailed do not have to be signed again. This includes applications signed by telephonic signature through the lowa Food Bank Association.

Note: If an applicant prints a paper application and types information into it, the signature cannot be typed. This is different than an electronic signature, because the client is not provided with the appropriate legal language to constitute a valid signature. If someone submits an application with a typed signature, you do not have a valid application. However, it would be good customer service to reach out to the client to give them an opportunity to add a hand-written signature to the form. If they do so, the application is valid from the date you receive the signed form.

Households can apply for SNAP using the *Food and Financial Support Application*, form 470-0462 or 470-0462(S). Applying through the self-service portal also constitutes completion of this application.

Tell clients applying for FIP that the requirements of applying for cash assistance do not apply to SNAP. Also inform households that getting SNAP benefits has no bearing on any other program's time limits.

To continue getting SNAP when the current certification period is about to end, a household must complete form 470-2881, Review/Recertification Eligibility Document (RRED), within 30 days after the end of the certification period.

The following sections explain procedures for:

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

Handling a Request for an Application

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

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

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

Tell everyone who asks about applying for SNAP that:

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

Date of Application

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

Policy: A SNAP application must be date-stamped when an HHS local office receives it. The date-stamp establishes the application's "filing date." The filing date is the first date for which an applicant can receive SNAP benefits based on a valid application. See Filing a SNAP Application for what is a valid application.

Procedure: Date-stamp applications delivered to an open HHS office with the same date on which a valid application is delivered.

Date-stamp applications delivered to a closed HHS office with the date of the next HHS full-time office workday.

When an application is left at a less-than-full-time office while it is closed, date-stamp it as received on the first day that is not a weekend or state holiday following the date that office was last open.

An electronic application is considered delivered to an HHS office when it is received by HHS. All electronic applications received by HHS while full-time offices are open must be date-stamped with the same date on which the application is received. All electronic applications received by HHS while full-time offices are closed must be date-stamped with the date of the next HHS full-time office workday.

Comment: If a household used the wrong application form to apply for SNAP, the date that form is date-stamped is the filing date. The household still must complete the correct application form to get benefits.

- 1. County A has a less-than-full-time office that is open only on Mondays and Wednesdays. The office was last open Wednesday, April 24. When the office reopens on Monday, April 29, all applications left under the door between the close of business April 24 and opening of business April 29 must be date-stamped as received on April 25.
- 2. HHS receives an electronic application on Sunday. Monday is a state holiday. When HHS full-time offices open Tuesday, the application is date-stamped as received Tuesday.

Notifying and Screening for Emergency Service

Legal reference: 7 CFR 273.2(i)(2)

Policy: Notify all applicant households about emergency service criteria. Screen all SNAP applications immediately upon receipt to determine if the household may be eligible for emergency service.

Procedure: You may notify households using an application insert or using your appointment letter.

- If your office chooses to notify by application insert, include:
 - Comm. 084, Information on Emergency Service with every English application, and
 - Comm. 084(S), Informacion Sobre El Servicio De Emergencia with every Spanish application.
- If your office chooses to notify by appointment letter:
 - The appointment letter must have a section on the front with the following wording:

Emergency Appointment:yes	no
(See the attached information on emerge	ency service.)

Check "yes" or "no" to tell the household whether it may be entitled to emergency service.

- You also must send the information about emergency service by:
 - Enclosing Comm. 084 or Comm. 084(S), or
 - Copying the Comm. 084 or Comm. 084(S) content on the back of the letter.

A receptionist, a volunteer, or any other employee shall screen to see if the household may be eligible for emergency services whenever:

- Someone comes into the office to apply, or
- One of the following applications is filed:
 - Food and Financial Support Application, form 470-0462 or 470-0462(S).
 - Review/Recertification Eligibility Document (form 470-2881), if filed after the end of a certification period.

Use the criteria under **Determining Eligibility for Emergency Service** to make this determination.

Comment: See <u>Emergency Service</u> for information on processing requirements for a household eligible for emergency service. Note that when you schedule the interview, keep in mind you have only until the seventh calendar day after the application was filed to:

- Interview the household,
- Approve benefits, and
- Have an electronic benefit transfer card in the household's hands.

Withdrawal of Application

Legal reference: 7 CFR 273.2(c)(6)

Policy: A household may voluntarily withdraw its application any time before eligibility is determined.

Procedure: When a household withdraws an application:

- 1. Contact the household to confirm the withdrawal.
- 2. Document in the case file the contact and the reason for withdrawal, if the household gave a reason.
- 3. Issue a Notice of Decision denying the application.
- 4. Tell the household it can reapply at any time. If the household wants the application form back, make a copy for the case file and give the original to the household.

Note: Workers cannot make an eligibility determination prior to gathering all necessary verifications and making a formal eligibility determination. Therefore, workers cannot advise a client to withdraw an application or tell a client prior to their formal determination if they will or will not be eligible for SNAP benefits.

Authorized Representative

Legal reference: 7 CFR 273.2(n)

Policy: A household may name an authorized representative:

- When it completes the application for SNAP, or
- At a later date.

See 7-A, Authorized Representative.

If an authorized representative applies on behalf of a household, the household must still sign the application. This is where they are attesting to the accuracy of the information provided. The authorized representative should sign the application in the space allocated for a person who assisted in completion of the application.

In extreme situations in which the applicant cannot sign, such as due to incompetence or incapacity:

- The case should be documented with the reason why the household was unable to sign, and
- The household should be notified that it will be held liable for any overpayments resulting from erroneous information given by the authorized representative.

Legal guardians are different than authorized representatives. If somebody has a legal guardian, the guardian has been court appointed to act on behalf of that person. If legal guardianship has been established through the court, the signature of the guardian on the application is sufficient.

Interviews

Legal reference: 7 CFR 273.2(e)(1) and (3), 273.12(a)(3), 273.21(g)

Policy: All households must have an interview before being certified. Schedule a phone interview unless:

- You determine that a face-to-face interview is appropriate, or
- The household requests a face-to-face interview.
- Complete a home-based interview only upon request from the household when a hardship exists.

Schedule all interviews so that eligible households receive SNAP within:

- Seven days after they apply if identified as eligible for emergency service, or
- 30 days after they apply.

Procedure: Upon receipt of an application, attempt to contact the household by phone. If you make contact and they agree to do the interview immediately, do it then.

If contact isn't made with the household during the initial call:

- Schedule a phone interview by leaving the standard voicemail message at the phone number they provided.
- Give the household at least 24 hours advanced notice of the interview. For example, a worker calls a client at 10:30 a.m. on Monday but doesn't make contact and leaves a voicemail to schedule an interview. That interview can't be scheduled before 10:30 a.m. Tuesday.
- The timeframe for interviews cannot exceed a two-hour window of time. For example: 8 a.m. to 10 a.m.
- Document the specific date and time of the scheduled interview in WISE.

If the household doesn't have a phone, or a voicemail message can't be left at the phone number provided, an appointment letter must be mailed within one business day.

If a worker fails to attend an interview they scheduled with a household, the worker must schedule another interview and follow the same requirements for scheduling initial interviews. For example, a worker has a scheduled interview on Monday between 1-3 p.m. The worker is running behind and isn't able to call the household until 3:15 p.m. The calls to the household go to voicemail. In this situation, the worker needs to schedule another interview with the household, following the same requirements as initial interview scheduling. The worker cannot send a NOMI because the worker failed to attend the scheduled interview.

Comment: The interview is an official and confidential discussion of household circumstances. Don't send a request for verification prior to the interview. The purpose of the interview is to obtain the details of the household's situation so eligibility can be determined. After the interview, you will know what verification is needed.

The following sections explain:

- Standard voicemail messages
- How to conduct interviews
- Voter registration procedures during the interview
- Failure to attend the interview

Standard Voicemail Messages

There are two approved messages to leave on voicemail when scheduling an interview. The messages differ depending on whether a household qualifies for emergency services.

Non-Emergency Applications

"This is (worker name) with the HHS calling for (client name). A phone interview is required for your SNAP/FIP application. I will call you on (day of the week and date) between (two-hour timeframe) to hold the interview. If I can't reach you, your application may be denied. If this time does not work for you, please call me immediately so we can reschedule. Thank you."

REMEMBER: When calling for the scheduled interview, two attempts must be made (at least five minutes apart) and document before issuing a *Notice of Missed Interview (NOMI)* (522).

Emergency (Use only if interview must be completed the same day to meet timeframes.)

"This is (worker name) with the HHS calling for (client name). A phone interview is required for your SNAP application. From the information on your application, it looks like you may be eligible for Emergency SNAP. Please call me back today by 3:30 p.m. at (worker phone number) to complete your interview. If I don't hear from you by 3:30 p.m., I will call you on (the next business day) between (two-hour timeframe). If I can't reach you, your application may be denied. If this time does not work for you, please call me immediately so we can reschedule. Thank you."

REMEMBER: When calling the following day for the scheduled interview, two attempts must be made within the scheduled interview window (at least five minutes apart) and document before issuing a *NOMI* (522).

Conducting an Interview

Legal reference: 7 CFR 273.2(e)(1), 273.21(c), 273.12(b)(1)

Policy: An interview is required even if the application indicates that the household may be ineligible. The person interviewed can be the head of the household, the spouse, any responsible member of the household, or an authorized representative. Applicants may have anyone they want present during the interview.

Procedure: Call the applicant during the scheduled interview window. If there is no answer, wait at least five minutes and call again before issuing the required NOMI (522). You must document the specific date and times you attempted to reach the applicant.

- Review with the applicant all information and questions on the application.
- Ask if changes in household circumstances happened between the application date and the interview.
- Using the application, information gathered before the interview, and information learned during the interview, resolve any unclear, inconsistent, or incomplete information with the household.
- Explain:
 - Rights and responsibilities.

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

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

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

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

Voter Registration Procedures During the Interview

Legal reference: 721 IAC Chapter 23

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

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

Failure to Attend the Interview

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

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

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

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

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

Household Reporting Requirements

Legal reference: 7 CFR 273.12(a)(vii), 273.12(a)(viii), and 441 IAC 65.5(234)

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 \$4,250 or more.

Once the household is informed of their reporting requirements during the interview, these are the requirements they must adhere to. This means households are not required to report changes that occur after the interview but prior to processing, unless the change meets one of the requirements above. If the household does report a change prior to processing, the change must be acted on.

Procedure: At each interview, explain to the household how and when to report required changes. Tell the household that it must report these changes by the 10th day of the next month.

Explain this to the household every time you interview, at least once every 12 months. Explaining this carefully, whether you interview by phone or in person will help avoid household caused errors.

When conducting the interview:

- Explain what "gross income" is. Do not assume that everyone understands the difference between take-home pay and gross income. Explain that "gross" means the amount before any deductions are taken out. Repeat this point each time you interview.
- Tell the person you interview to keep the form, Reporting SNAP Changes, and to do the following at the end of each month:
 - Add up the gross income all household members received in the month. Make sure the household understands to include the income of the ineligible members, such as ineligible aliens.
 - If the household has self-employment income, explain that the amount of annualized income will be automatically entered on the form, and that amount must be added to other income.
 - Compare the household's total gross income for the month to the amount on the form.
 - If the household's total gross income is over the amount on the form, report it by the 10th of next month.

Reporting Requirements for Categorically Eligible Households

Legal reference: 441 IAC 65.5(4)

Policy: Do not require categorically eligible households to report any income changes if the household reported income in excess of its gross income limit and remained eligible. Take appropriate action on all reported changes.

Comment: A categorically eligible household that reports income in excess of its gross limit is not required to report further income changes until recertification. This includes households that are over the gross limit at the time of application.

Tell the person you interview that:

- The household may report changes other than income if it wants to, and that appropriate action will be taken on all reports of changes, based on policies for acting on changes in 7-G.
- There are consequences if the household does not report if it goes over the limit:
 - The household might have to repay benefits if they do not report as required.
 - Not reporting changes on purpose could result in an Intentional Program Violation (IPV).
 - Quality Control might review the case to see if the household reported if it went over the gross income limit.

Verification

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

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

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

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

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

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

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

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

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

The following sections explain:

- Documentary evidence
- Collateral contacts
- Home visits
- IEVS
- Mandatory verification at application

Documentary Evidence

Legal reference: 7 CFR 273.2(f)(4)(i)

Documentary evidence is a written confirmation of a household's circumstances. Wage stubs, utility bills, and rent receipts are examples of documentary evidence. Do not limit the form of verification to any single type of document.

Use documentary evidence as the main source of verification for everything except residency and household size. Use a collateral contact for these two items if documentary evidence is not readily available.

Collateral Contacts

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

A collateral contact is an oral confirmation of a household's circumstances by someone outside the household. Use collateral contacts in situations where documentary evidence is not available or when the evidence is not complete enough to decide eligibility or the amount of benefits. Make collateral contacts either in person or over the telephone.

Select a collateral contact if the household does not choose one or chooses one that is unacceptable. Examples of acceptable collateral contacts are employers, social service agencies, migrant service agencies, neighbors of the household, or anyone who can be expected to give accurate third-party verification.

When talking with collateral contacts, disclose only the information necessary to get the verification. Avoid disclosing that the household has applied for SNAP. Do not suggest that the household is suspected of doing anything wrong. See 7-A, <u>Confidentiality</u>, for restrictions for disclosing household information.

Home Visits

Legal reference: 7 CFR 273.2(f)(4)(iii)

Use home visits as verification only when documentary evidence cannot be obtained, or when the evidence is not enough to make a determination of eligibility or benefit level. You must schedule the home visit in advance with the household.

State Income and Eligibility Verification System (IEVS)

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

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

IEVS Information Considered Verified

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

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

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

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

IEVS Information Not Considered Verified

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

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

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

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

Mandatory Verification at Application

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

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

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

The following sections give instructions on:

- Verifying identity
- Verifying disability
- Questionable information

Verifying Identity

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

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

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

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

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

Verifying Disability

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

Verify the disability of a household member. See 7-A, <u>Disabled Member</u>, for requirements for a determination of disability.

Households can verify disability by providing proof that they get benefits:

- Under Titles I, II, X, XIV, or XVI of the Social Security Act.
- From a Railroad Retirement disability annuity from the Railroad Retirement Board and has been determined to qualify for Medicare.
- As interim assistance pending for receipt of SSI or disability-related Medicaid.
- From the Veterans Administration (VA) that shows the person is:
 - A veteran receiving disability benefits from a disability (service-connected or nonservice-connected) that is total or paid at the total rate from the VA, or
 - A disabled surviving spouse or disabled child of a veteran entitled to compensation or pension benefits due to the death of the veteran.

Questionable Information

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

Verify all factors of eligibility that are questionable if they affect the household's eligibility and benefit level. Examples of questionable information are:

- Information on the application that differs from statements made by the applicant.
- Information that is inconsistent with other information on the application or previous applications.
- Information that is inconsistent with information received from other sources.

When deciding if information is questionable, look at each household's individual circumstances, and allow the household a chance to explain the situation. Do not deny eligibility solely because information is questionable.

For example, if expenses exceed income, do not automatically deny an application. Give the household the opportunity to explain the situation. If the household cannot provide a reasonable explanation, ask for further verification of how the household is paying its bills. If the household does not provide the requested verification, deny or cancel assistance.

Processing Standards

Legal reference: 7 CFR 273.2(g)

Regulations require that applications be processed within a certain amount of time. Calculate this length of time from the date the household files an application. The first day of the processing period is the first calendar day after the date the application is filed.

All households eligible under emergency processing timeframes must have an EBT card and access to their SNAP benefits within seven calendar days of the date of their application. Allow two days for mail delivery when determining what date you must make system entries in order for the household to get benefits within seven calendar days. See <u>Emergency Service</u>.

All other eligible households must have an EBT card and access to their SNAP benefits within 30 days of the date of their application. Allow two days for mail delivery when determining what date you must make system entries in order for the household to get their benefits within 30 calendar days.

Households applying for recertification also have different processing time limits. See <u>7-G</u> for more information on these policies.

The following sections describe the requirements for:

- Approving an initial application
- Denying an initial application
- Dealing with delays in processing an application

Approving an Initial Application

Legal reference: 7 CFR 273.2(g)(1), 274.2(b)

Issue form 470-0485, 470-0486, or 470-0486(S), *Notice of Decision*, when approving an application. The notice must:

- State the amount of the allotment for the month of application and the current month.
- Indicate the amount of the allotment for the rest of the certification period.
- State the beginning and ending dates of the certification period.
- Contain information on how benefits were calculated.
- Inform the household that the amount of SNAP will vary if changes are anticipated at the time of certification.

If a household is ineligible for the month of application but eligible for following months, the notice must explain why. The notice must give the same information if benefits are approved for the month of application but denied for the next month. The notice must also include an explanation of the household's appeal rights, the telephone number of the local office, and if possible, the name of the person to contact for more information.

The following sections explain how to:

- Handle future changes reported at application
- Establish the length of the certification period

Determine the effective date of benefits

Handling Future Changes Reported at Application

Policy: At application, a household may report a future change. Prior to certification, gather as much information and verification as possible. If you have all of the information and verification needed to act on the change, you must track the change and take action at the appropriate time. If the future change is not verified, no further tracking is required.

- I. Household applies on June 8 and states their son Brandon will be starting college in the fall. You clarify that he starts classes on August 15 and will not meet student requirements while attending school. Approve the household, including Brandon. Set a reminder to remove him when he becomes an ineligible student. He is eligible for August, but must be removed from benefits starting in September because we have verified information that he will be an ineligible student.
- 2. Household applies on February 3 and states mom is on maternity leave but plans to return April I. You verify employment, and it shows she last received income in January and is scheduled to return on April I. Budget no income from this source for February or March. However, since we have verification that she is returning April I, project income starting with the April benefit month.
- 3. Household applies August 10 and states dad is currently off work (unpaid) due to an injury. They hope he will be back to work by October, but neither the household nor the employer can verify a return date because it is dependent on the doctors releasing him. Approve the application, budgeting no income from this source. Since we don't have a verified return date, there is nothing to track. Remind the household of their responsibility to report when he returns if income exceeds the threshold.

Establishing the Certification Period

Legal reference: 7 CFR 273.10(f), 441 IAC 65.5(3)

Policy: Assign a certification period to all eligible households. Certification periods must always cover entire calendar months. Assign the longest certification possible based on the predictability of the household's circumstances.

Comment: The length of the certification period depends on the households' circumstances. Use the following chart to assign the longest certification period possible, based on the type of household and the predictability of the household's circumstances. No household may be certified for less than four months. Once the certification period has been established, it may not be shortened.

Household type:	Certification length is:
All adult members are at least age 60 or disabled and have no earned income	12 months
All others	 6 months 4 month certification periods may be assigned for: Migrant farm worker households. Households that appear to be ineligible in the near future.

A household can be certified for a shorter period if necessary to match the SNAP recertification with the FIP review.

At initial application, the certification period begins with the first month the household is eligible. At recertification, the new certification period begins the month after the end of the previous certification.

A household cannot get benefits after its certification period expires unless it reapplies.

Effective Date of Benefits

Legal reference: 7 CFR 273.10(a), 273.2(h)

Prorate SNAP from the date of application, unless the household:

- Is already certified at the time of application. (See 7-C, <u>Duplicate Assistance</u>.)
- Caused a delay in processing. (See <u>Delays in Processing</u>.)
- Is a seasonal farm worker or migrant household that got benefits in the month before the month of application.

Some states issue benefits for a fiscal month instead of a calendar month. A fiscal month overlaps two calendar months. In these cases, consider the benefits to be received in the first calendar month that the fiscal month covers.

If the household moves from one of these states and applies for benefits in lowa, find out when the household last got benefits from that state. If the lowa application is received in the second of the two months, the effective date is the date of application.

- 1. Household A got benefits in Illinois for the period of May 15 to June 14. These benefits are intended for the month of May. Household A applies for SNAP in Iowa on June 5. If the household is eligible, prorate benefits for the month of June from June 5.
- Same as Example I, but instead of applying in June, Household A applies on May 25. Since
 the household already received benefits for the month of May, the application is effective
 June I.

If a household is ineligible for the month of application but eligible for following months, the notice must explain why. The notice must give the same information if benefits are approved for the month of application but denied for the next month.

The notice must include an explanation of the household's appeal rights, the telephone number of the office, and if possible, the name of the person to contact for more information.

Denying an Initial Application

Legal reference: 7 CFR 273.10(g)(1)(ii) and (iii), 273.2(g)(2)

Issue a *Notice of Decision*, using form 470-0485, 470-0486, or 470-0486(S), after determining the household is ineligible. This notice must include:

- An explanation of the reason for the denial.
- The manual chapter and subheading supporting the denial.
- The rule or regulation reference supporting the denial.
- The household's right to request an appeal.
- The toll free number of the office.
- If possible, the name of the person to contact for more information.

If the household did not appear for a scheduled interview and did not contact the office to reschedule within 30 days of the date of application, deny the application. Make system entries for the denial on the thirtieth day following the date of application. If the thirtieth day falls on a weekend or holiday, deny the application by making system entries the next working day.

When additional information or verification is needed, notify the household in writing what they must provide and give them 10 days to provide it. The 10-day period begins with the day after you issue the request. If the 10th day falls on a nonworking day or a legal holiday, extend the due date to the next working day for which there is regular mail service.

If the household fails to provide the missing verification by the due date, deny the application. You do not have to wait until the thirtieth day to deny an application for this reason.

NOTE: You must **reopen** the case if the household provides the missing verification within 60 days of the application date. Issue benefits from the date of the application if the household provides the verification within the first 30 days. If the household provides the verification during the second 30 days after application, issue benefits from the date the missing information is provided.

Delays in Processing

Legal reference: 7 CFR 273.2(h), 441 IAC 65.6(1), 65.6(2), 65.6(3)

A "delay in processing" occurs when:

- Eligibility cannot be determined within 30 days after the date of application.
- The household has not had the opportunity to participate within the 30-day processing period.

A delay in processing means there is a second 30-day time period to finish processing the application. How you determine eligibility depends on who caused the delay.

The following sections explain procedures for:

- Issuing a notice of pending status
- Delays caused by the household
- Delays caused by the county office
- Delays beyond 60 days

Notice of Pending Status

Legal reference: 7 CFR 273.10(g)(1)(iii)

When there is a delay in processing, send a notice of pending status on the thirtieth day following the date of application. If the thirtieth day falls on a weekend or holiday, make computer entries on the next working day.

When the household caused the delay in processing, use pending notice code 154 111, which tells the household:

"It has been 30 days since you applied for SNAP. Your SNAP will not start on the date you applied because you did not give us the information we asked for within the first 30 days."

"Your application will be reopened if we receive your required verification within 60 days of the date of the application. Call your worker if you do not know what you still need to do. If the verification is not received within the 60 days of the date of the application, you must reapply."

When the county office caused the delay in processing, use pending notice code 153, which tells the household:

"We are working on your SNAP application. You have done all you need to do."

Delays Caused by the Household

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

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

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

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

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

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

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

Delays Caused by the County Office

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

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

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

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

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

Delays Beyond 60 Days

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

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

- If the **household** is at fault for the delays in **both** the first and second 30-day periods, deny the application. The household must file a new application if it wants SNAP. Do **not** send a *Notice of Decision* if the household was sent a notice of pending status.
- If the **local office** is at fault for the delays in **both** the first and second 30-day periods and eligibility **cannot** be determined, send a *Notice of Decision* to deny the application, even when a notice of pending status was sent. Tell the household to file a new application. Also inform the household that it may be entitled to lost benefits back to the date of initial application.
- If the **local office** is at fault for delays in **both** the first and second 30-day periods, and eligibility **can** be determined, process the application. If the household is eligible, approve benefits back to the date of application.
 - Determine the household's eligibility and benefits for the months following the 60-day period, until you reach a month of ineligibility or you cannot determine eligibility. Ask the household to file a new application when you reach a month for which you cannot determine eligibility or benefits.
- If the **household** is at fault for the delay in the **first** 30 days, and the **local office** is at fault for the delay in the **second** 30 days, process the application. If the household is ineligible, deny the application and send a *Notice of Decision*, even if a notice of pending status was sent.
 - If the household is eligible, approve benefits back to the date the household did what it needed to do. Determine the household's eligibility and benefits for the months following the 60-day period until you reach a month for which you determine the household is ineligible or you cannot determine eligibility.
 - Ask the household to file a new application when you reach a month for which you cannot determine eligibility or benefits.
- If the **local office** is at fault for the delay in completing the application process in the **first** 30 days, and the **household** is at fault for the delay in the **second** 30 days, deny the application. Send a *Notice of Decision* even if a notice of pending status was sent. The household must file a new application if it wants SNAP.

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Emergency Service

Emergency Service

Legal reference: 7 CFR 273.2(i)(2), 274.2(b)

Time limits for processing an application under emergency procedures are much shorter than those for normal processing. Determine the household's eligibility for emergency service at each initial application. The household does **not** have the option to decline emergency service.

A household can get emergency service only when the household meets one of the emergency criteria in the first month of the certification period. A household that is ineligible during the month of application can receive emergency service in the next month if it meets emergency criteria in that month. A new application is not needed.

There is no limit to the number of times a household can be certified under emergency procedures. EXCEPTION: To be eligible for emergency service, a household that was canceled for not providing postponed verification must either:

- Have been certified under normal processing time frames, or
- Have provided the previously postponed verification. However, a household cannot be required to provide verification that is no longer needed.

The following sections explain:

- Eligibility for emergency service
- Verification for emergency service application
- Determining emergency benefits
- Processing time frames for emergency service

Determining Eligibility for Emergency Service

Legal reference: 7 CFR 273.2(I)(I) and (3), 273.11(a), 274.2(b)

Policy: Provide emergency service to a household that:

- Has \$100 or less in liquid resources and less than \$150 in monthly gross income; or
- Has shelter costs (monthly rent or mortgage plus the applicable standard utility allowance) that are higher than its combined gross monthly income and total liquid resources; or
- Has at least one member who is a migrant or seasonal farm worker, is destitute, and has liquid resources of \$100 or less. (See 7-I, Emergency Services, for what "destitute" means.)

Procedure: When you determine how much a household has in gross monthly income:

- Do not count any excluded income. See 7-E.
- For self-employment, gross monthly income means the annualized monthly amount after selfemployment expenses. See 7-I, Self-Employed Households, for self-employment income and expenses.

Verification for Emergency Benefits

Legal reference: 7 CFR 273.2(f)(1)(i); 273.2(i)(1), (2), and (4); 273.11(a); and 274.2(b)

Policy: You must verify the identity of the applicant. Any other verification can be postponed, this includes, but is not limited to, verification of alien status, student status, and pending DIAL investigations.

Procedure: Verify the applicant's identity using:

- A collateral contact (see <u>Collateral Contacts</u>), or
- Any other available source of proof (see <u>Documentary Evidence</u>).

You can postpone other verification for 30 days from the application date. See <u>Verification</u> for what is considered verification and what must be verified. Tell the household in writing what proof must be provided. Document in the case record what verification was postponed.

Comment: When you postpone verification of:

- A social security number, see <u>7-C, Good Cause for Not Supplying a Social Security Number</u>.
- A migrant household's out-of-state information, more time may be allowed. See <u>7-I, Migrants and</u>
 Seasonal Farm Workers.

Determining Emergency Benefits

Legal reference: 7 CFR 273.2(f)(1)(i); 273.2(i)(1), (2), and (4); 273.11(a); and 274.2(b)

Policy: Determine a household's emergency service benefits using:

- All verified information available to you, and
- The best available information for proof that was postponed. This includes information provided by the household such as income and expenses the household declares.

See 7-1, Migrants and Seasonal Farm Workers, for income policies.

Emergency Service Processing Time Frames

Legal reference: 7 CFR 273.2(i)(3), (4), 274.2(b), 441 IAC 65.2(234)

Policy: A household eligible for emergency service is entitled to benefits by the seventh calendar day after the date the household submits its application.

Procedure: Start counting the seven calendar day processing time limit the day after the day the household submits its application. To make benefits available to an eligible household within this time limit, the household must have:

- An EBT card in its possession, and
- Benefits available in EPPICTM. See <u>14-</u>J for information about EPPIC® and when benefits are available to the household.

Determine when you must make system entries.

- If the household already has an EBT card, system entries must update no later than the sixth day after the application date to be timely.
 - If the household does not have an EBT card, system entries must update no later than the fourth day after the application date to account for one work day and two mail days.
- If the household already has an EBT card, system entries must update no later than the 29th day after the application date to be timely.
 - If the household does not have an EBT card, system entries must update no later than the 27th day after the application date to account for one work day and two mail days.

If a household eligible for emergency service misses a scheduled interview, notify the household that it is responsible for rescheduling the interview.

The only situation that would cause a household to lose its right to emergency service is a missed interview. If the household does not contact you in time to allow you to issue benefits within the seven-day time limit the household, the household loses its right to emergency service. Process the application within 30 days of the application date.

Comment: When a household misses their interview and has lost their right to emergency service, it is still important to process the application as quickly as possible.

When you discover later in the application process that a household is eligible for emergency service:

- The seven-day time frame for providing benefits starts with the date of discovery.
- Document in the case record that the date of discovery is being used as the first day of the emergency service processing time limit.

Emergency Service Processing Time Frames

Application Date	ABC Entries By	Mail Time (2 days)
Monday	Thursday	Saturday/Monday
Tuesday	Thursday	Saturday/Monday
Wednesday	Friday	Tuesday/Wednesday
Thursday	Monday	Wednesday/Thursday
Friday	Tuesday	Thursday/Friday

The chart assumes:

- No holidays fall within the seven days,
- ABC entries were successfully updated in that night's batch process,
- The household needs an EBT card and the EBT card is mailed the next working day (M-F) after ABC entries are made.

Combined Allotments for Households Entitled to Emergency Service

Legal reference: 7 CFR 274.2(c)(2)

Policy: Issue both the initial month's prorated benefits and the next full month's benefits at the same time when a household:

- Files an initial application after the fifteenth of the month, and
- Is eligible for both the initial and following month.

Certification Notice and Postponed Verification

Legal reference: 7 CFR 273.2(i)(4)(iii)(B), 274.2(b)

Policy: Certify households who are approved for emergency services with a normal certification period. End the certification period if the household does not provide the postponed verification within 30 days after the application date.

NOTE: If the 30th day from the application date falls on a weekend, holiday, or date without regular mail service, the due date must be extended to the next workday.

Procedure: Make system entries according to instructions in 14-B(5), Approving an Application and Emergency Services. When you enter the limit date in the LIMIT field, a notice will be issued. This notice tells the household that SNAP will stop if the household does not turn in postponed proof by the 30th day from the application date.

If the household fails to provide all postponed proof, the case will automatically close based on the ABC limit date entries. Do not send another notice. The household was already notified that the certification period would end.

If the household provides all proof by the 30th day from the application date, remove the "limit date" entries from the LIMIT field. Make system entries based on the new information if necessary to affect future months' benefits.

- If the case has not closed, the household will continue to receive benefits for the rest of the certification period.
- If the case has already closed, make system entries to reopen and issue benefits for the second or third month, whichever is later. Make the entries:
 - Within five working days of the date verification is provided, or
 - In combined allotments, by the first working day of the second or third month.

After emergency service has been provided, you may receive verification indicating that the client should have gotten fewer benefits. Do not do a claim if the initial decision was based on the best information available to both you and the applicant.

- 1. The G household applies for SNAP on October 12. The household is eligible for emergency service. The G household must have its benefits and EBT card no later than the seventh calendar day, October 19.
- 2. Mr. C applies for SNAP on Monday, May 15. A phone interview is scheduled for May 16. Mr. C does not answer the phone for the interview.
 - On Wednesday, May 17, Mr. C calls and asks to reschedule his interview. There is still time to issue emergency benefits. Mr. C is entitled to be offered an interview for Wednesday or Thursday. System entries must be made by Thursday, May 18. This will allow Mr. C to get benefits by Monday, May 22.
- 3. Mr. B applies for SNAP on Monday, May 15. An interview is scheduled for May 16, but Mr. B does not appear. On Monday, May 22 (day seven), Mr. B calls and asks to reschedule his interview. Mr. B has lost his right to emergency service. His application will be processed under the normal 30-day processing standards whether he appears for an interview before the 30th day or not.
- 4. Mr. D applies for SNAP on Monday, May 15, and an interview is scheduled for May 16. Mr. D does not appear for the interview. On Thursday, May 18, Mr. C contacts the office to reschedule. The local office offers to interview in person or by phone that same afternoon in order to meet emergency service time limits. Mr. D says he is not available until Tuesday, May 23.
 - At this point, the local office has done everything possible to ensure timely processing. When Mr. D's interview is conducted on May 23, he has forfeited his right to emergency service. His application will be processed under the normal 30-day time frames.
- 5. Ms. A files an application on Tuesday, May 9, listing \$800 monthly income from work and \$300 rent with no additional utility costs. The interview is scheduled for Wednesday, May 17. At the interview, Ms. A states that she has no income. The income she listed is her roommate's, and she buys and prepares food separately.
 - The worker issues emergency SNAP and documents in the case file that May 17 is the date of discovery and the first day of the emergency processing time.
- 6. The M household files an application on the third Thursday in November. The household is eligible for emergency service. Because the seventh day falls on Thanksgiving, the SNAP allotment must be received by the Wednesday before Thanksgiving.

Public Assistance Households

Legal reference: 7 CFR 273.2(j), 441 IAC 65.13(2)

Households can apply for SNAP at the same time they apply for public assistance.

Unless the household has indicated that it does not want SNAP, all public assistance applications must be processed as SNAP applications with the same timelines and procedures as other SNAP applicants. If it is unclear if a household that files a public assistance application wants to apply for SNAP, either contact the household or ask during the interview.

Use only SNAP policies to process the SNAP part of a public assistance application. If the public assistance portion of the application is denied, continue to process the SNAP part. A new application is not needed.

Single Interview

Legal reference: 7 CFR 273.2(j)(1), 441 IAC 65.13(3)

When a household applies for both public assistance and SNAP at the same time, hold one interview for all programs. Do **not** make the household see a different IM worker or attend separate interviews for each program. After the interview, separate workers can process the application for the different programs.

Inform households applying for FIP that time limits and other requirements specific to FIP to not apply to SNAP.

Verification Procedures and Timeliness

Legal reference: 7 CFR 273.2(j)(1)

Use SNAP verification procedures for eligibility factors that affect only SNAP. When eligibility factors affect both public assistance and SNAP, you can use the same verification as used for other public assistance. However, if verification is requested you must give the household 10 days to provide it.

If there is enough verification at the end of 30 days to process SNAP but not enough to process public assistance, proceed with determining SNAP eligibility. Do not delay a decision solely to wait for the public assistance information. SNAP time limits still apply to the SNAP part of the application.

Joint Application Process for SSI Households

Legal reference: 7 CFR 273.2(k)(1)(i) and (iii), 441 IAC 65.13(1)

If **all** members of a household receive SSI, that household can choose to apply for SNAP at either the HHS local office, or at the Social Security Administration (SSA) office. A household can apply at the SSA office only if:

- It is **not** participating in SNAP,
- It has not applied for SNAP in the previous 30 days, and
- It does **not** have a SNAP application pending.

If the household chooses to apply at the HHS office, get necessary verification from the household, SDX, or BENDEX. Follow the same application procedures, including verification requirements, as for any other household.

If the household chooses to apply at the SSA office, SSA will forward the application to the HHS office in the county where the applicant lives. If the household lives in a county with a less-than-full-time office, the SSA will forward the application to the appropriate full-time office. In either case, SSA will send the application within one working day after receipt.

After receiving the application from SSA:

- Determine eligibility and issue SNAP to eligible SSI households within 30 days after the date the
 application is filed at SSA. If the household is eligible for emergency processing, the emergency time limits
 begin the day the HHS office gets the SNAP application.
- Determine eligibility and benefits based on information provided by SSA or by the household.
- Make a determination based on SNAP criteria.
- Certify the household according to the requirements of SNAP.

The following sections explain:

- Applications for people being released from public institutions
- Limits on additional interviews
- Emergency service screening
- Denial of an SSI application
- Case maintenance
- Recertification

Release Applications for Residents of Public Institutions

Legal reference: 7 CFR 273.1(e)(2)

Residents of public institutions can apply for SSI and SNAP before being released. The Social Security Administration will forward these applications to the appropriate HHS office and notify the office when the applicant is released. The application is considered filed on the date the applicant is released.

After receiving the application from SSA:

- Keep the application pended until the applicant is released from the institution.
- Get information about the client's circumstances from the SSA, the institution, or the client.

Process the application within the normal processing time limits. For households eligible for emergency processing, the seven-day time limit begins the day the applicant is released from the institution.

Consider these applicants categorically eligible **only** when they are approved for SSI **and** the applicant is released from the institution. If the SSA does not timely notify you of the date the client was released, restore benefits back to that date.

No Additional Interview

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

Households that file an application for SNAP through a Social Security Administration office are not required to attend an additional interview through HHS. Do not contact the household further to get information for SNAP certification unless:

- The application is incomplete, or
- Mandatory verification is missing, or
- Information on the application is questionable.

Contacting the household for these reasons is not considered a second SNAP certification interview.

When SSA takes an SSI application or redetermination over the telephone from a member of an SSI-only household, SSA also completes a SNAP application and interview. The household is not required to go through an HHS interview. Do not ask the household for further information, except as outlined above.

Emergency Service Screening

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

The Social Security Administration must screen all applications for possible emergency service on the day it gets the application. SSA will mark "Emergency Processing" on the first page of all applications that appear to be entitled to it.

Screen all applications from the SSA for possible emergency service. Do this on the day the application arrives at the local office.

The SSA tells these households that they may get benefits a few days sooner if they apply directly at the HHS office. The household can take the application from SSA to the HHS office for screening, an interview, and processing.

The seven-day processing time limit begins with the date the local office gets the signed application. However, if the applicant files an SSI and SNAP application before being released from a public institution, the seven days begin with the date of release.

Denial of SSI Application

Legal reference: 7 CFR 273.2(k)(1)(iii)

When SNAP eligibility or benefits may be affected because the SSI part of the joint application was denied, send the household a *Notice of Expiration*. In the notice, advise the household that:

- The certification period will expire at the end of the month after the month the notice is sent;
- The household must reapply if it wants to continue receiving SNAP, and
- The household may be able to have an out-of-office interview.

Case Maintenance

Legal reference: 7 CFR 273.2(k)(1)(iii), and (2)

Households must report changes in circumstances to the HHS local office. See <u>7-G</u> reference for policies and procedures regarding changes. Monitor the results of the SSI determination through SDX and BENDEX. Take any required action within 10 days after learning of the SSI determination. You will get the information from either SDX, the household, the SSA, or from another source.

Restore benefits to the household whenever the local office or the Social Security Administration made an error in joint processing that caused the household to get less SNAP benefits than it should have gotten. See <u>7-H</u> for more information on restoring lost benefits.

Recertification

Households containing only SSI applicants or recipients can apply for SNAP recertification at a Social Security Administration office. Consider the application filed for normal processing purposes when the SSA receives a signed application.

SSA forwards the completed application, transmittal form, and any available verification to the designated local office. When SSA accepts and refers the application, do **not** require the household to appear at an HHS office interview. You can have a non-face-to-face interview if necessary.

Ask the household for additional information only if the application is not completed, mandatory verification is missing, or information is questionable.

Approve or deny a timely application for recertification according to SNAP policies.