

# SNAP

# Case Maintenance

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## Overview

This chapter is divided into four sections:

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

## Reporting Requirements

Legal reference: 7 CFR 273.12, 44I 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 in a single lottery/gambling winning.

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

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

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

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

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

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

See [Interview](#) for how to explain the reporting requirement to the household.

### **Household Fails to Report a Required Change**

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

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

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

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

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

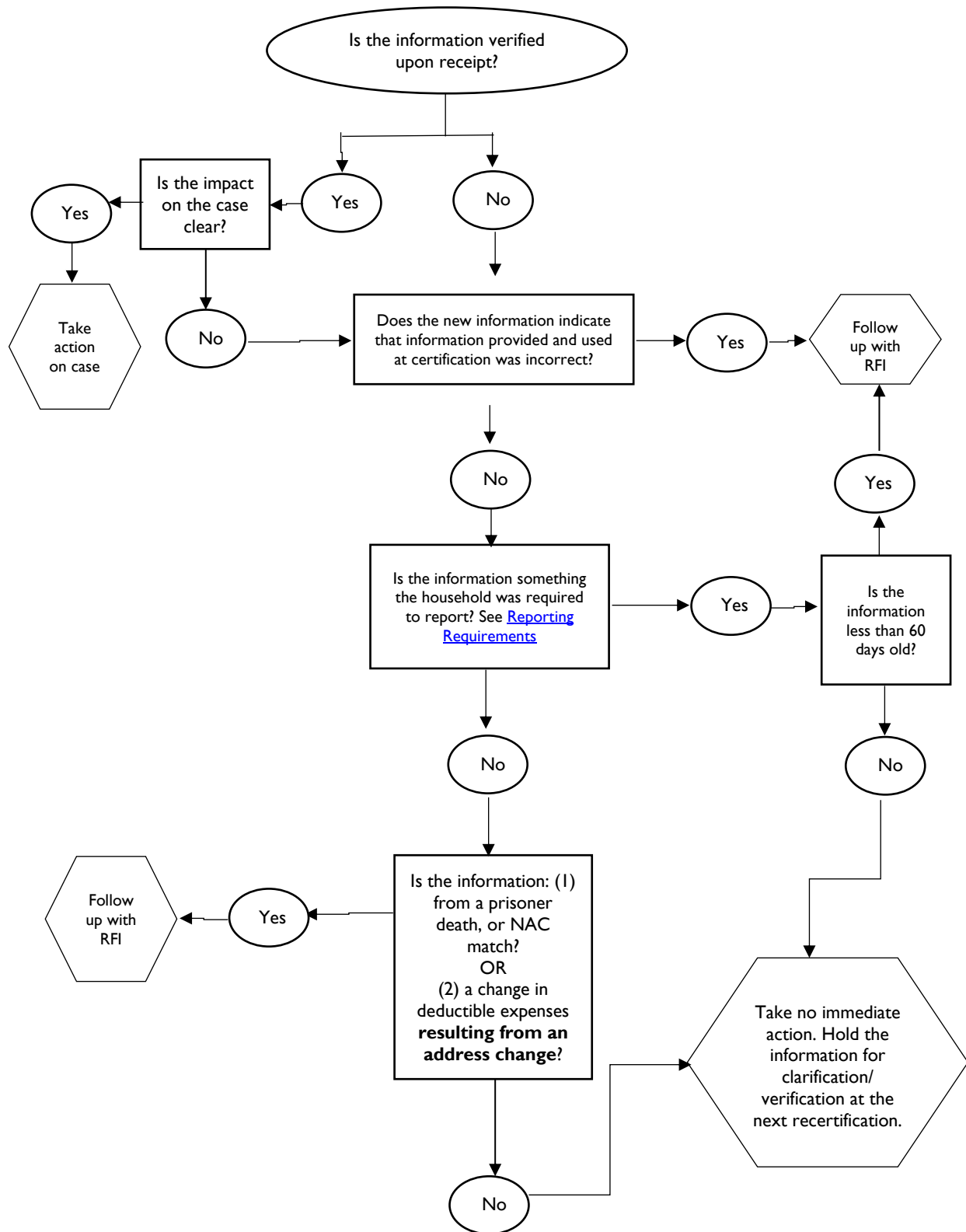
### **Action on Changes Reported During the Certification Period**

Legal reference: 441 IAC 65.5(7), 7 CFR 273.2(f), and 273.12(c)

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

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

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



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

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

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

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

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

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

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

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

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

**Comment:** Common examples of changes requiring action during the certification period are provided below.

1. Household A is receiving SNAP. We receive an UIB report showing that a member started receiving UIB benefits. Because this information is verified upon receipt, income is entered.  
  
Since this will result in decreased benefits for the household, action must be taken within 10 days of the verified change.
2. Bill is a SNAP recipient. On October 20, he reports that his girlfriend Sue has moved in and they purchase and prepare meals together. Bill states Sue has no income, and you find nothing questionable when doing lookups. Since there is no income to verify and a new household member does not require further verification, consider this reported change to be verified upon receipt. Add Sue to Bill's benefits effective November 1.
3. Household consists of Jim and his child. He submits a desk RRED on May 8, reporting \$0 income, and you recertify them for June 1 – November 30. On July 10 he calls to report that his job at Employer T ended.  
  
You review his case file and see there is no income entered, and ask how long he has worked there. He informs you that he started in March and says he must have forgotten to report it on his RRED. Since this indicates that the information used at certification was incorrect, you must follow up with an RFI and close his benefits if verification is not provided.  
  
In addition you will need to determine if there is an overpayment and whether or not an IPV will be pursued.
4. Mary is a SNAP recipient who was receiving \$100 per week in child support when she applied, so \$400 is budgeted on her case. In April, Mary reports that she is no longer receiving child support because the other parent lost his job two months ago. You access ICAR and see that he was consistently paying his weekly amount, but that ended in mid-February and she has received no payments since then.  
  
Since we are able to verify the information she is reporting through our data sources, remove the child support from her case. Since this will result in increased benefits, adjust benefits for May.
5. Bob is approved as a household of one, with a certification period of April through September. At the time of his certification, he is working part-time earning \$800 per month. On June 8 he calls to report that he is now working full time and he exceeded his reporting threshold in May.  
  
Since this is a change he was required to report, send an RFI requesting verification of his change in income. If it is provided, enter the verified income. If it is not provided, close the case for failure to provide requested information.
6. Laura is approved as a household of one in August, with verified earnings of \$250 per week (\$1,000 per month). On October 5, she submits a letter from the employer showing that she received a promotion with higher pay and more hours, and that starting with October 20<sup>th</sup> paystub she will be earning \$400 per week (\$1,600 per month).  
  
Regardless of whether or not this causes her to exceed the threshold, she has voluntarily provided information that is verified upon receipt. Enter the new income for November benefits, allowing for timely notice.



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

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

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

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

### **Changes Held Until Recertification**

If the change does not meet one of the criteria for taking action during the certification period:

- Do not send a request for verification. Instead, document the report in the case file. At recertification, the information will need to be clarified and, if appropriate, verified.
- Inform the household that, while we are not requesting verification, we will take appropriate action on any information they choose to voluntarily verify. Follow policies for increasing or reducing benefits to adjust benefits for the appropriate month.

Follow the approved procedural scripts for explaining this to the household. This is especially important if the reported change could result in increased benefits.

Because some changes are held until recertification, it is important to thoroughly review the case file before taking action when a change is voluntarily verified. This must be done to avoid unnecessary errors.

Luna is approved in August using \$500 earned income from Dottie's Discount. In November, she calls to report her job ended and you explain that if she voluntarily provides verification, you can remove the income. A few days later you get a copy of a termination letter from ABC Bank showing she was hired in September and her last day of employment was October 28.

Since the "rolling" income is from a different employer, and she hasn't reported or verified it ended, no action is taken. At recertification, you will need to clarify what happened to the job at Dottie's. If there is any indication that the two jobs overlapped or combined income would have caused her to exceed the threshold, further verification may be needed at that time.

**Comment:** If the household is active for another program, you cannot include SNAP on the RFI and cannot cancel SNAP if the information is not provided. However, if verification is provided and becomes part of the case record, you must take action for SNAP. At that point the information is verified and the impact on the case is clear.

If the household reports a future change, do not request verification if it does not yet meet a criteria for a change requiring immediate action. For example, a household might report a new job and, based on the information provided, it appears the job will put them over the income limit. Unless they have already exceeded the limit in a month, they are not required to report it and we cannot request verification. At that point, remind them of the importance of reporting the job once it causes their income to exceed the reporting threshold. If they voluntarily provide verification so they don't need to remember to report again later, take action on the verified information.

If a household requests a blank form (ESOE, Landlord Questionnaire, etc.) at any time so they can voluntarily provide verification of changes in income, you may provide one. However, do not require it or send an RFI with a due date in those situations. Common examples of changes which are held until the next recertification are provided below.

1. Household consists of Mr. F and his child. At the time of application, Mr. F has no income. Two months later, he calls to report that he started a job and will be earning \$1000 per month.  
  
Because this is under the reporting threshold, no immediate action is taken. Document the case with the reported change so it can be addressed at the next recertification, but do not send an RFI.
2. Household G is approved for SNAP and FIP with \$0 income. Two months later, Ms. G calls to report that she started a job at Employer W and expects to earn approximately \$600 per month.  
  
Because this does not put them over the reporting threshold, verification cannot be requested for SNAP. However, since she is also on FIP, an RFI is sent. When completing the RFI, only FIP can be marked as a program for which failure to return information will result in closure.  
  
If verification is:
  - Returned: Take appropriate action for FIP and also enter the income for SNAP. Even though it was not required for SNAP, it is now verified and must be used.
  - Not returned: Take appropriate action for FIP, but do not cancel SNAP. This reported income will need to be addressed at recertification.
3. Sheila and her two children receive SNAP. When approved, Sheila has \$800 in earned income. You receive a UIB report showing Sheila is now receiving \$200 per week in UIB. She has not reported that her job ended.  
  
The UIB is verified upon receipt and must be used. Although the UIB report is a good indication that her job as ended, her earned income cannot be removed until verified. Since a job ending is not something she is required to report, no action is taken on the potential job ending.  
  
If Sheila later calls to report that the job ended, explain to her that you will remove this income once verified. However, do not send an RFI. If she voluntarily verifies it ended, it can be removed. Otherwise, the earnings will continue to roll until the next recertification. At that time, the situation will need to be clarified and, if needed, verified.
4. Household consists of Ms. H and her two children. At the time of application, she is earning \$500 per week (\$2,000 per month), which is under the income limit for a household of three. The month after approval, she calls to report that she is getting a promotion which will result in more hours and higher pay. She thinks it will put her over the reporting threshold.  
  
You discuss the situation with her and clarify that she has not yet exceeded the limit. Do not request verification because it does not meet one of the criteria for taking immediate action. Document the case with the report and remind her of her responsibility to report once she exceeds the limit.

5. Jill is a SNAP recipient with reported monthly income of \$500. While certified, she reports that her husband Tim has moved back in and also earns \$500 per month. Since the total household income has not exceeded the reporting threshold for a household of one (the requirement she was provided with at the time of certification), she was not required to report this change.

You cannot add Tim without also adding his income, but this is not a change that requires immediate action.

Document the case but do not send an RFI regarding Tim's income. Explain to Jill that if she chooses to verify his income, you will add him to her case. If:

- Jill voluntarily provides verification of his income, add him (and his income) to her benefits
- She does not voluntarily provide verification of his income, do not add him to benefits. Address the change at the time of her next recertification.

6. Household E is receiving SNAP. At application, they reported and provided verification of rent of \$500 and the Big SUA. They call to report that their rent at the same address has increased to \$600. The household was not required to report this change and the agency is not required to verify the change during the certification period. Explain to the household that they may voluntarily provide verification of the increased rent amount. If they provide the verification, update the rent amount accordingly. Do not send an RFI and do not take any action on the case if verification is not provided. Verify the change at recertification.

7. SNAP household F consists of Mr. and Mrs. Johnson. At recertification, Mrs. Johnson verifies her earnings from the Sunny Travel Agency are \$1,000.00/month. Their SNAP case is recertified from January 1<sup>st</sup>-June 30<sup>th</sup>. On April 5<sup>th</sup>, Mrs. Johnson calls to report that Mr. Johnson started employment on March 29<sup>th</sup> at Patty's Putt-Putt and he anticipates he'll earn \$1,200.00/month. Through discussion with the client, the worker discovers that as of the date of the report (4/5), Mrs. Johnson has only received one paycheck in the month, which was received on 4/1 for \$500.00 and Mr. Johnson has also only received one paycheck on 4/4 for \$600.00. They have not exceeded the income limit for the current month or any prior month.

Regardless of the fact Mrs. Johnson has previously verified income rolling on the case, the client's actual income received in the month up to the date of the report (in this example, 4/5) is the amount used to determine whether or not the household exceeded the income limit. The rolling income is not added to the new income when making this determination. The worker documents the case and reminds the client of their reporting requirements.

NOTE: Even though the household anticipates that their combined income will cause them to exceed the income limit in the future, they have not yet exceeded the income limit and therefore an RFI cannot be sent.

8. Household G is approved for SNAP for mom, dad, and two children. At the time of the RRED, the clients provided verification that both parents were working, but they did not claim a childcare expense. During the certification period, mom called to report the children started attending Happy Kids Daycare and they pay \$1,000.00/month. Because this is a change the household was not required to report, an RFI cannot be sent. However, it is important to explain to the client that if they voluntarily provide proof of their childcare expense, it may increase their SNAP benefits.

9. Jade, 19, is receiving SNAP benefits as a household of one. During the certification period, Jade calls to report that she moved in with her mother, Janet. Janet does not receive SNAP benefits and she has income, but Janet and Jade's combined income does not cause them to exceed the income limit for a household of one. An RFI cannot be sent to verify Janet's income because the household was not required to report this change. Explain to Jade that if they voluntarily provide proof of Janet's income, Janet can be added to Jade's SNAP case. If they do not, Jade will remain active on SNAP until her next recertification and at that time, the worker will address adding Janet to the case.

NOTE: Even though Janet is mandatory household member due to Jade's age, the household was not required to report this change. Jade's case cannot be canceled for being ineligible as a separate household during the certification period.

10. Household H is certified for SNAP benefits. During the certification period, Mrs. H calls to report the birth of her baby, Camila. Mrs. H reports that Camila is still in the hospital but she thinks Camila will come home next week. This future change is not verified upon receipt because Camila has not come home from the hospital yet. Explain to Mrs. H that she can call back once Camila has come home and then she will be added to the SNAP case effective the month after the month of report. An RFI cannot be sent to request further information or verification of the change

### **Multiple Changes**

**Policy:** A household may have multiple changes to report at one time. Look at each change to determine if it requires immediate action or should be held until the next recertification, and act accordingly.

**Procedure:** See the applicable policy in this chapter for the timeframe for acting on each change. Remember that you must look at all aspects of each change. For example, if a new member with income enters the home, you cannot add the person without also adding the associated income. That is one change. (See #5 above)

1. Ted is a SNAP recipient with no income. On January 18, he reports that his girlfriend Sara moved in and he wants to add her to his benefits. Sara has no income. He also reports that he started a new job and expects to make approximately \$800 per month. There are two independent reported changes – Sara moving in and Ted starting a new job. Each reported change must be looked at independently to see if immediate action is required.

Sara has no income and her entry into the home is verified upon receipt. Therefore, the impact of her joining the household is clear and further verification is not required. Add Sara to Ted's benefits effective February 1.

Since Ted's new income was not a change he was required to report, and is not verified upon receipt, no further action is required at this time. Document the reported change and remind the household of their responsibility to report if income exceeds the threshold. At recertification, Ted's new job must be addressed.

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

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

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

3. Sylvia is an active household of one, and reports that she gave birth to a son. She also reports that the baby's father, Eddie, is in the home and is earning \$500 per month at Gus's Burger Hut. He was not previously included in the SNAP household.

Since the baby's birth requires no further verification, he is added to her case for the next month. However, there is no immediate action taken to add Eddie. Even though we know he is there, his income does not cause Sylvia to exceed the income limit. Therefore, unless she chooses to voluntarily provide verification of his income, Eddie and his income will be addressed at the next recertification because the baby makes him a mandatory member.

4. Lexi calls to report that her job ended and UIB has started. The combination of income does not cause her to exceed the reporting threshold. You are able to verify the UIB using data sources.

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

### **Verifying Changes**

Legal reference: 7 CFR 273.12(c)(3), 44I IAC 65.22(1) and 65.41(234)

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

**Procedure:** When further verification is required during the certification period, send a letter to the household at the last address the household provided. In the letter:

- Clearly tell the household what verification is required.
- If the request is based on information received via a prisoner or death match, choose that option on the RFI.
- Explain the various methods by which they may provide the information.
- Give the household 10 days to respond. Make the due date:
  - The 10th day after you mail or give the letter, or
  - The next workday for which you have mail service if the 10th day is a weekend or holiday.
- Tell the household what will happen to its case if it fails to answer, as directed by the appropriate policy. Some policies tell you to cancel, and some do not.

If failure to provide verification results in cancelation, and the household fails to provide **all** requested information, cancel the case. Exception: If the household fails to provide verification of a deductible expense, remove the deduction but do not cancel the case.

**Comment:** If the reported information does not give a clear indication that it was a change the household was required to report, do not request verification. Hold the information until the next recertification unless the client voluntarily provides more information prior to that time.

Clarice sends a note saying she started a job at the Whistle Stop Café, but provides no further information. Since there is no indication that she exceeded the income limit, verification is not requested. Hold this change and follow up on it at recertification. It is her responsibility to contact you if she exceeds the reporting threshold before that time.

### **Third-Party Fails to Provide Verification**

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

**Policy:** If the household requests help in obtaining verification, do not cancel a household if a third-party fails to provide it.

A third-party is anyone but an eligible or ineligible household member. For an explanation of who is an ineligible household member, see [7-1. Ineligible Household Members](#).

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

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

### **When a Change Will Increase Benefits**

Legal reference: 7 CFR 273.12(c)(1) and 273.2(f)(8)(ii), 441 IAC 65.41(234)

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

**Procedure:** If verification is needed, see [Verifying Changes](#) for instructions.

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

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

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

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

See [Third-Party Fails to Provide Verification](#) if:

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

1. On August 1, Ms. M reports that her son moved back into the household. Her son does not have income or any other factor that needs to be verified. Therefore, you do not need verification in order to add the son. Adding the son will increase the household's benefits. Recalculate September benefits to include Ms. M's son.
2. On September 23, Mr. N reports that he moved and his shelter expenses increased. Verification of this change is requested, due October 3. He provides verification on October 1. Since this was prior to the due date, benefits must be adjusted for October (the month after the change was reported).  
  
If he failed to verify the new amount by the due date, shelter expenses must be removed. If he later provides verification, benefits are adjusted for the month after the change is verified.

### **Issuing Supplemental Allotments**

Legal reference: 7 CFR 273.12(c)(1)

**Policy:** Recalculate the allotment to issue an additional amount by the 10th day of the next month when:

The household is eligible for an increase for that month, and

- That month's benefits are already available in EPPIC™.

**Procedure:** See [14-B\(5\), Supplemental Issuances](#) for system entries.



On August 30, Ms. J reports that her son Bob has moved in with her. You determine that Bob does not have income and meets all other eligibility requirements.

On the same day, you make system entries to add Bob to the household effective September 1. Because it is after August system cutoff, September benefits have already been determined. The system will issue a supplemental allotment for September to add Bob to Ms. J's household.

### **When a Change Will Reduce or End Benefits**

Legal reference: 7 CFR 273.12(c)(2) and (3)

**Policy:** When a change requiring action during the certification period will reduce or end a household's benefits, issue a *Notice of Decision* within 10 days of the date the impact on the case is clear. This means that for changes:

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

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

**Procedure:** Act on the change within 10 days of report if no further verification is required. If verification is required, see [Verifying Changes](#) for how to request verification.

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

- See [Reinstatement](#) if the reason for cancellation no longer exists before the effective date.
- See [Reinstatement After the Effective Date of Cancellation \(Grace Period\)](#).

See [Continuing Benefits Under Appeal](#) if the household appeals the *Notice of Decision* and asks to keep getting benefits while waiting for the outcome.

**Comment:** For timely notice requirements, see [I-E, Dispensing With Timely Notice](#). See [I4-B\(5\), SNAP Case Actions](#) for system entry instructions.

Do not initiate a claim if benefits were issued and:

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

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

1. Ms. A reports on April 3 that her son moved out. The impact is clear and this will cause a decrease in benefits. Issue a *Notice of Decision* within 10 days to remove Ms. A's son from the SNAP household effective for May.
2. Ms. B reports on April 9 that her hours at work have increased from 10-25 per week. Upon review, there is no record of reported income. She informs you she was working there at application but must have forgotten to report it since the hours were so low. Since we now know that information used at certification was incorrect, an RFI is sent to verify her income.  
  
Verification is received on the due date of April 19, and this income will cause a decrease in benefits. If possible, make the change to decrease benefits for May. However, timely notice is required and it may not be possible to get this done. Since we have 10 days to act on the verification, benefits must be decreased no later than June, allowing for timely notice. In addition, because the job was unreported at application, you need to determine if an overpayment exists for any months.  
  
NOTE: If verification is not received by the due date, benefits must be closed for May, allowing for timely notice. Benefits can be reinstated if we receive the verification or discover it was at HHS but had not yet been scanned.
3. Mr. C is receiving SNAP. On July 3 he reports that he started getting child support a couple months ago. We check ICAR and are able to see that payments started. Since this is verified and the impact on the case is clear, action must be taken to decrease benefits for August. There is no overpayment for the child support he received in the prior months since this is not a change he was required to report.
4. Household D's certification period is expiring August 31. On August 3, we receive a prisoner match showing that Mr. D is in jail. Since this is the final month of the certification period, you do not need to follow up and take action to decrease or cancel benefits. However, if they apply for recertification, this must be verified prior to recertifying the household for September.
5. Household E is in the final month of their certification period when we receive a notice of QC sanction. Even though the certification period is expiring, the household must be notified of the disqualification so they are aware of the additional requirement if they apply for recertification or later reapply for benefits.

### **Reinstatement**

Legal reference: 7 CFR 273.15(k), 44I IAC 7.7(6) and 65.44(1)

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

The reason for which the case was canceled no longer exists, **and**

- Eligibility and benefits can be determined.

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

**Procedure:** Send an adequate notice when you reinstate benefits to the same or to a higher level. See [I-E, Adequate Notice](#).

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

### **Reinstatement After the Effective Date of Cancellation (Grace Period)**

Legal reference: 441 IAC 65.44(2)

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

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

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

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

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

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

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

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

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

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

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

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

### **Continuing Benefits Under Appeal**

Legal reference: 7 CFR 273.15(k), and 441 IAC 7.7(6)

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

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

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

Gets a final decision.

- Has a new change. Act on the new change:
  - Keep the factor under appeal held constant.
  - Issue a new *Notice of Decision*.

Applies to be recertified. Do not keep the factor under appeal held constant for the new certification period.

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

### **New Reason to Keep a Case Canceled or Benefits Reduced**

Legal reference: 441 IAC 7.7(6) and 65.44(234)

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

Do not use “Remain Canceled” when:

The household does not have a new reason for cancellation.

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

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

See [1-E, Notice of Decision](#) to see if timely notice applies. If the second negative action requires timely notice, it is too late to give timely notice, and the first reason for the negative action no longer applies:

Reinstate the household to its previous level of benefits if the household cures the original reason for cancellation by the effective date of cancellation. See [Reinstatement](#).

Then give timely notice to reduce or cancel the benefits for the next month.

**Comment:** Do not establish a claim if:

You reinstate to the previous benefit level, and

- You gave timely notice for the new reason, and
- The household reported the second change timely, and
- You acted timely.

## **Common Changes in Household Circumstances**

This section contains information regarding how to handle specific changes that may occur.

### **Household Moves**

Legal reference: 7 CFR 273.3, 273.12, and 273.13

**Policy:** Households are not required to report when they move. However, if you become aware of a new address, you must determine if there has been a change in shelter or utility costs.

You do not need timely notice to cancel a household's SNAP case when the household reports it moved to another state. Do not close SNAP in Iowa based on information from another state saying that a client has applied there. The client needs to contact us to request closure so they can receive benefits in the other state.

**Procedure:** Shelter and utility expenses need to be verified when a household reports a move, regardless of whether or not the household reports a change in expenses. Request verification of expenses at the new address. If the household does not provide the information, remove the previous expenses. If later provided, they can be used for future months.

See [14-B\(5\), Canceling Ongoing Benefits: Due to Move](#) for system entries when a household moves out of state.

### **Household's Mail is Returned**

Legal reference: 7 CFR 273.12(c), 273.13

**Policy:** When the post office returns a household's mail, no action is taken. A household is not required to report a move, and information from the post office is not considered verified upon receipt. Unless the household contacts you to report an address change, do not take any action.

**Procedure:** When mail is returned by the post office, but you haven't had contact from the client, hold this information until recertification. At that time you will need to clarify the situation with the household. This is true regardless of whether:

- the post office returns the mail with or without a forwarding address, or
- the new address is in Iowa or out of state.

### **Adding a Member**

Legal reference: 7 CFR 273.12(c)

**Policy:** Households are not required to report if a new member joins the household, unless that person's income causes them to exceed the reporting threshold for their original household size. Do not ask for an application to add a new member to a household.

If a baby is born and the father is in the home, but was not previously included in SNAP, he becomes a mandatory member upon the birth of the child. If he has income, you must look at total household income to determine if verification must be requested.

When the household, in the month of the child's birth, reports both the birth of the baby and that the child's father is in the home, look at the total household income from the 1<sup>st</sup> day of the month through the date of the report to determine if the household exceeded their original reporting threshold. If the household had not exceeded their reporting threshold up to the date of report, do not send an RFI. If they had exceeded the original reporting threshold with the income received up to the date of the report, an RFI must be sent. See example 5 below.

If the household does not report the changes in the month that the new member joins the household, you must determine if the household's total income exceeded their original reporting threshold in the month of report and in any previous month when the new member was in the home. See example 6 below.

**Procedure:** Remember that you can't add a new member without also adding any corresponding income. If no further verification is needed, add the new member effective the first day of the month after the month in which the household reported the change unless:

- Timely notice is required. For example, timely notice is required if the new member's income will **decrease or end** benefits. For timely notice requirements, see [I-E, Dispensing With Timely Notice](#). See [When a Change Will Increase Benefits](#).
- The person is still active on another case. EXCEPTION: include individuals while active on another case as allowed under [7-C, Duplicate Assistance](#).

If verification is needed to add the member, and this doesn't meet the requirements for immediate action during the certification period, document the case file and hold the reported change until recertification. For system entries, see [I4-B\(5\), Adding a Person to an Active SNAP Case](#).

1. Gina reports on July 23 that her boyfriend, John, moved in. John receives social security income and was not previously receiving SNAP. Because his income can be verified through data sources and the impact on the case is clear, John is added to Gina's SNAP effective August 1.
2. Ryan reports that his wife Christy moved in. Her income causes them to exceed the reporting threshold he was originally given. Therefore, this is a change that requires action. Send an RFI for verification of her income. If it is returned, add her to benefits. Depending on how much income she has, this could result in decreased or canceled benefits. If information is not returned, the case needs to be closed for failure to provide verification.
3. Janet reports that her 20 year old son moved in. He earns approximately \$300 per month, and this does not cause the household to exceed the limit. You cannot add him without adding his income, so no action is taken. Explain that if she voluntarily verifies his income, you will add him to her benefits. Otherwise this will be addressed at recertification.

4. On May 18, Meredith reports that her daughter Riley was born on May 10 and they are home from the hospital. No further verification is needed, so Riley is added to Meredith's SNAP household effective June 1. NOTE: If Riley's dad is in the home but was not previously on the SNAP case, he is now mandatory. However, Riley's birth and her dad in the home are two separate changes. Add Riley to SNAP, and then determine if the father's presence is a change which requires immediate action or will be held until recertification.
5. On June 23, Miranda reports that her son Noah was born on June 18, and his father Kenny is also in the home and earns \$500 per week. Noah is added to SNAP effective July 1.  

Kenny cannot be added without also considering his income. To determine if verification of Kenny's income is needed immediately or held until recertification, add all of the income Kenny has received up to the date of report to all other household income and compare it to Miranda's original reporting threshold. If the combined income received up to the date of report is not over Miranda's original reporting threshold, do not send an RFI. If the household voluntarily provides proof of Kenny's income, add Kenny and his income to SNAP effective the month after the month the verification is received.

NOTE: If the household's income up to the date of report did not exceed the reporting requirement, but it appears that the household's income for the entire month will exceed the limit, do not send an RFI but remind the household of their requirement to report the month following the month they actually exceed the limit.
6. On December 15, Alina reports that her daughter Camille was born on October 31. Alina also reports that Camille's father Theo has been in the home since Camille's birth. Camille is added to SNAP effective January 1.  

Theo cannot be added without also considering his income. To determine if verification of Theo's income is needed immediately or held until recertification, add Theo's income received each month in October-December to all other household income each month and compare it to Alina's original reporting threshold. If the combined income in any of those months exceeded Alina's original reporting threshold, an RFI must be sent to verify Theo's income

If the total household income did not exceed the original reporting threshold in any month from October-December, do not send an RFI. If the household voluntarily provides proof of Theo's income, add Theo and his income to SNAP effective the month after the month the verification is received.

**Comment:** If the new member is active on another case, document both cases with this reported change. Depending on the situation, you may be able to act without further verification. Otherwise, this reported change is held until recertification, unless the household voluntarily provides verification showing the member has joined their household. See [Children Moving Between Homes](#) for situations of joint custody.

NOTE: When adding a member who is active on another case, use the verified information from that case file. You are basically just moving the recipient from one active case to another. Any additional changes would be handled following policies for action on changes during the certification period.



Leslie and her son Sully receive SNAP. She reports that Jake, Sully's dad, has moved in. Jake has in own SNAP case, with verified monthly income of \$500 from employer X. Leslie reports that Jake no longer works at X, but now works at employer Y and earns \$1000 monthly.

Since the new income does not cause them to exceed the reporting threshold, it does not need to be verified. Close Jake's SNAP case and add him to Leslie's household, using the \$500 verified income from employer X. The changes in employment will need to be clarified and, if necessary, verified at next recertification.

If the household reports the new member moved from another state and was active on someone else's case there, contact the prior state to verify the benefits have closed. If the person is still active in the other state, this change is not verified and the new member can't be added. If the household later contacts you to say the new member's benefits are now closed, follow up with the other state again in an attempt to verify this information.

Depending on the relationship the Iowa household has with the household from which the new member came, they may or may not be able to work with that household to get the person removed from benefits. However, if the Iowa household voluntarily provides verification that the new member has moved to Iowa, work with the other state to get the new member removed from benefits there.

NOTE: If the other state informs you the new member is still active, it would be good customer service to let the Iowa household know so they are aware that further verification will be needed. However, formal denial of the application to add the new member should not be sent.

1. Monica is receiving SNAP. She reports that her son Kevin moved back from Ohio, where he was receiving benefits with his dad. Inform Monica that you will call Ohio to verify that Kevin has been canceled. If so, you can add him to her benefits. If he is still on benefits there, you will need verification of his move to Iowa prior to adding him to her benefits.

When you contact Ohio, they inform you that Kevin is still receiving benefits with his dad. Therefore, no further action is taken and you document this reported change to be further addressed at recertification. It would be good customer service to let Monica know this so she can follow up if she wants.

A few days later, Monica provides verification showing that Kevin has been enrolled in school in Iowa. This verifies Kevin no longer resides in Ohio. Work with Ohio to provide them with this verification so they can remove Kevin for no longer being a resident. Once that is done, he is added to Monica's Iowa benefits the first of the following month.

2. Albert is receiving SNAP and on July 10<sup>th</sup> reports that his son Owen has moved back from Nebraska. Owen was previously getting benefits with his mom there, but Albert thinks Owen's mom removed Owen from benefits. You call Nebraska and learn Owen is still active. It would be good customer service to let Albert know this so he can follow up if he wants.

One week later Albert calls to tell you that he talked to Owen's mom and she has now removed him from her benefits. You contact Nebraska again and verify this is correct, and that he will not receive Nebraska benefits beyond July. Add Owen to Albert's case for August.

## **Removing a Member**

Legal reference: 7 CFR 273.12(c)

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

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

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

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

## **Children Moving Between Homes**

Legal reference: 7 CFR 273.12(c)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Legal reference: 7 CFR 273.24

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

**Procedure:** ABAWDs are informed of their three month limit at the time of application. The form 470-3967, *ABAWD Letter* tells them to contact HHS if they meet one of the requirements at any time. If you get one of these reports, don't request verification. However, explain to the client that if they choose to voluntarily provide verification, you will take action. If the client requests an ESOE to verify the job, provide one. However, do not send an RFI with a due date.

1. Carl is approved for SNAP as an ABAWD not meeting work requirements. His three months of ABAWD eligibility are projected to be January, February and March, and you set a reminder to cancel effective April 1.  
  
On January 25, Carl reports that he started working 25 hours per week. Since he didn't exceed the income limit, he was not required to report this change. Tell him that if he provides verification, you will reassess his ABAWD months. At his request, you provide him with a blank ESOE for verification.  
  
On February 4, Carl returns the ESOE which verifies he started a job on January 20 and is working 25 hours per week at \$10 per hour. Since he didn't work 80 hours in January, that still counts as an ABAWD month.  
  
Enter \$1,000 (\$250 per week x 4 weeks) as earned income effective with his March benefits. Even though it was too late to use the income for February, this is no longer an ABAWD month since he is working 80 hours in the month. Update the tracker to remove February and March as ABAWD months. Remind him of his requirement to report if his hours go below 80 per month.
2. Jeanie and Kyle are SNAP recipients, certified through August. Kyle is an ABAWD not meeting work requirements, and his final month of ABAWD eligibility will be June. In May, they call to report that Kyle started working 20-25 hours per week. This does not cause them to exceed the reporting threshold.  
  
You explain to them that if they choose to verify the job, you will use this information. It would be prudent to remind him that he will close at the end of June for not meeting ABAWD requirements if this is not provided.  
  
On June 15 you get a reminder to cancel Kyle. Since they did not voluntarily verify his new job, you remove him from benefits effective July 1. At the time of the next recertification, you will need to address this job. NOTE: Even if he is no longer working there, you may need to request verification to determine if he has additional months of ABAWD eligibility.

### **A Member Becomes Ineligible**

Legal reference: 7 CFR 273.11(c)(3)

**Policy:** Remove a member from a household's case when you have verified information indicating the person is ineligible for SNAP.

**Procedure:** Check to see how the loss of the ineligible member affects the household:

- See [7-C, Categorical Eligibility](#) for how the loss affects the household.
- See [7-1, Ineligible Household Members](#) for how to treat income, expenses, and resources.

For system entries, see [14-B\(5\)](#) sections *Disqualification for Intentional Program Violation* and *Disqualification Other Than IPV* and [14-B-Appendix, Notice Codes](#).

1. Sally and her two children are receiving SNAP. A final decision is issued March 8 finding Sally guilty of an IPV. The impact of this change is clear, so Sally must be removed from the SNAP household effective April 1.
2. Mr. and Mrs. J apply for SNAP on June 8, and are certified through November. At the time of application, Mrs. J is an ABAWD not meeting work requirements. June is a prorated month, so Mrs. J's three months of eligibility are anticipated to be July, August, and September.  
  
Set a reminder for September to remove Mrs. J, so she doesn't receive benefits beyond her three months of eligibility. When that reminder comes up, if the household hasn't reported that Mrs. J is meeting work requirements and there is nothing in the file which verifies a change, she's ineligible effective October 1. Remove her from the household allowing for timely notice.  
  
If the household later contacts you to report that Mrs. J started a job and shouldn't have been canceled, treat this as an ABAWD who starts meeting work requirements.

### **A Member Regains Eligibility**

Legal reference: 7 CFR 273.7 and 273.12

**Policy:** Add a member back to the household when a reason for ineligibility ends.

**Procedure:** Add the member for:

- The first month after the reason for ineligibility ends, or
- The second month after it ends, if timely notice is required.

See [14-B\(5\)](#) for system entries regarding Removing or Shortening Disqualification, and Adding a Person to an Active SNAP Case.

### **FIP Is Terminated**

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

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

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

If the household appeals the FIP cancellation and:

- Asks to keep getting SNAP until the outcome of its appeal, keep benefits at the same amount as before FIP ended.
- Does not ask to keep getting SNAP until the outcome of its appeal, cancel or reduce the SNAP benefits. Give timely notice if needed.

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

### **Penalty for Means-Tested Program Sanction**

Legal reference: 7 CFR 273.11(j), 44I IAC 65.50(234)

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

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

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

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

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

### **Penalty for a FIP Sanction**

Legal reference: 7 CFR 273.11(j) and 44I IAC 65.50(234)

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

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

Apply for other benefits for which the FIP recipient may qualify, or

- Cooperate with the Child Support Recovery Unit.

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

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

A household is placed in the FIP limited benefit plan, or

- FIP is being recouped. See [7-E, Recoupment](#).

To implement the 10% penalty, see [14-B\(5\), Penalty for Not Following Another Program's Rules](#). Do not apply the 10% SNAP penalty retroactively.

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

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

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

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

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

### **Penalty When Sanctioned Household Applies for FIP or SNAP**

Legal reference: 7 CFR 273.11(j) and 44I IAC 65.50(234)

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

- Applies for SNAP and FIP on the same application, start the 10% penalty when you approve the application.
- Applies for FIP on an ongoing SNAP case, start the 10% penalty to SNAP for the month after FIP is approved. Timely notice is required.
- Applies for SNAP on an ongoing FIP case, start the 10% SNAP penalty when you approve SNAP benefits.

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

#### **Ending the 10% Penalty**

Legal reference: 7 CFR 273.11(j) and 441 IAC 65.50(234)

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

**Procedure:** Stop the 10% penalty when FIP is canceled or ends the sanction. To stop the penalty, see [14-B\(5\), Removing a 10% Reduction](#).

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

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

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

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



**Acting on IEVS and Other Automated Reports**

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

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

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

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

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

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

**Comment:** Establish a claim when:

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

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

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

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

Legal reference: 87 FR 59633

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

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

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

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

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

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

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

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

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

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

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

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

Legal reference: 7 CFR 272.14

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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## **Recertification**

Legal reference: 7 CFR 273.2(f)(8), 273.14; 441 IAC 65.2(1)“e,” 65.22(1) and 65.22(2)

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

- Apply using the *Review/Recertification Eligibility Document (RRED)*, or an Iowa SNAP application form.
- Interview once every 12 months,
- Provide verification when required.

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

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

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

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

- When recertifying with a telephone interview:
  - Fill in answers during the interview,
  - Make a copy of the RRED for the case file, and
  - Send the original to the household with a written request for information. Tell the household to review and initial changes, and to return the form within 10 days.
- When recertifying without an interview:
  - Mark the incomplete sections in red,
  - Make a copy of the RRED for the case file, and
  - Send the original to the household with a written request for information. Tell the household to complete missing items as marked and return the form within 10 days.

**Comment:** For how a RRED is issued:

- By the system, see [14-B\(5\), Recertification](#).
- By hand, see [6-Appendix](#), Form 470-2881, 470-2881(S), 470-2881(M), or 470-2881(MS), *Review/Recertification Eligibility Document*.

### **Timely or Untimely Filing a RRED**

Legal reference: 7 CFR 273.14(c), (d), and (e)

**Policy:** A RRED is considered timely filed when it is received in the local office by the 15th day of the last month of the certification period. RREDs filed after the 15th day of the month are untimely.

An SSI household may file a RRED at the Social Security Administration office.

**Procedure:** Households that file a timely RRED and meet all recertification requirements are entitled to recertify by the end of the current certification period and receive uninterrupted benefits. A household loses its right to uninterrupted benefits if it causes a delay in processing by missing a scheduled interview or failing to provide requested information by the due date. A household does not lose its right to uninterrupted benefits when the local office causes a delay.

**Comment:** Households that file an untimely RRED are entitled to recertify as quickly as possible, but are not entitled to receive uninterrupted benefits. However, a household still can get uninterrupted benefits if it completes all recertification requirements by the end of its certification period.

Whether a RRED is timely or untimely filed does not affect proration of benefits. Proration comes into effect only when the household causes a delay in processing or files its RRED after the end of the certification period. See [Delays in Processing a RRED](#) for examples of when benefits are prorated.

### **Interview**

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

**Policy:** Households must be interviewed at least once every 12 months. If the household is due for a non-interview (desk) RRED, an interview should only be conducted if:

- You schedule one because of a complicated situation and further explanation is necessary or
- You call to clarify multiple pieces of information and decide to review the entire RRED so that an interview will not be required again in six months.

If an interview is scheduled on a non-interview RRED, clearly document the reason for scheduling it. If this is not documented, you have no basis for denying a household for failure to attend an interview.

If you choose to conduct a complete interview when you call to clarify information, be sure to cover all aspects of the household's circumstances and follow processes for conducting the interview. Document the reason an interview was conducted, and code the next recertification as a non-interview RRED.

**Procedure:** You may schedule an interview:

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

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

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

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

### **Scheduling Interviews**

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

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

If contact is not made with the household:

Leave the standard voicemail message, as explained below, at the telephone number provided.

Provide at least 24 hours advance notice of the scheduled interview. Do not schedule an interview for the same day as the initial interview attempt.

Document the specific date and time of the scheduled interview.

The timeframe for interviews cannot exceed a two-hour window of time. For example: 8 a.m. to 10 a.m.

If you are unable to leave a voicemail message, an appointment letter must be mailed within one business day.

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

**Specific Worker:** “This is (*worker’s name*) with the Department of Health and Human Services calling for (*client’s name*). I received your recertification form for SNAP and need to do a phone interview. Please call me at (*worker phone number*) as soon as possible.

“If I don’t hear from you by (*day, date and time*), I will call you on (*day, date*) between (*window of time*). If I can’t reach you, your benefits will end. If this time does not work for you, please call me immediately so we can reschedule. Thank you.”

**Team:** “This is (*worker’s name*) with the Department of Health and Human Services calling for (*client’s name*). We received your recertification form for SNAP and need to do a phone interview. Please call (*worker phone number*) as soon as possible.

“When you call, be sure to ask for a RRED worker. Any RRED worker will be able to help you. If we don’t hear from you by (*day, date and time*), we will call you on (*day, date*), between (*window of time*). If we can’t reach you, your benefits will end. If this time does not work for you, please call me immediately so we can reschedule. Thank you.”

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

### **Conducting the Interview**

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

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

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

### **Explaining Simplified Reporting**

Legal reference: 7 CFR 273.12(a)(5), 44I IAC 65.5(234)

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

**Procedure:** Explain reporting requirements to the household every time you interview, at least once every 12 months. Explaining this carefully will help avoid household-caused errors. See [7-B, Household Reporting Requirements](#) for details about information to provide when explaining reporting requirements.

### **Failure to Attend the Interview**

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

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

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

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

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

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

### **Clarifying and Verifying Information**

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

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

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

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

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

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

If verification is needed to determine eligibility and benefits:

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

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

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



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

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

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

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

See specific policies for your case situation in [RRED Filed Before the End of the Certification Period](#) or [RRED Filed After the End of the Certification Period](#).

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

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

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

I. Mr. A files a RRED on May 5 to recertify benefits for June and an interview is held May 10. During the prior certification period, he reported a job start at Burger John's, which did not cause him to exceed the reporting threshold. Therefore, this job was not verified, but was held until recertification.

At his interview, he explains that he only worked at Burger John's for about a month, and got his last paycheck from them in March. He is now working at Taco Shack.

Because he no longer works at Burger John's and received his final pay more than 30 days before submitting his RRED, and you have no indication that he would have exceeded the reporting threshold, document the case file with this information. Additional verification from Burger John's is not needed. However, since he is currently working at Taco Shack, verification of this job is required. Send an RFI to provide Taco Shack's verification due May 20.

Mr. A does not return the verification by the due date and his application is denied for failure to provide information. However, he later returns the missing information on May 28, before the end of his certification period. Reopen the application and approve the case, providing benefits effective June 1.

2. Mr. B files a RRED on June 5 to recertify benefits for July. An interview is scheduled for June 12. Mr. B fails to attend and the worker sends a *SNAP Notice of Missed Interview*.  
  
Mr. B reschedules his interview for June 18. At his interview, Mr. B is given 10 days to provide required verification (by June 28). Mr. B does not provide the verification by June 28. On June 29, the worker sends a notice to deny the application for failure to provide requested information.  
  
Mr. B provides the missing verification on July 10. Reopen the case and prorate benefits from July 10.
3. Ms. C files a non-interview RRED on July 2 to recertify benefits for August. During her prior certification period, she reported a job at Derkin's which did not cause her to exceed the reporting threshold, so the change was held until recertification. On this RRED, she only reports income from Costless.  
  
Even though she didn't report that a job ended in the last 30 days on the RRED, we must determine what happened to the job at Derkin's. Since an interview is not required, you may attempt to call her to clarify the situation. If you reach her, clarify and document the details. If she received pay within 30 days prior to her application date, you will need to request verification of this job along with verification of Costless. If you don't reach her by phone to clarify the Derkin's job, an RFI must be sent.  
  
Remember that calling the client to clarify something does **not** constitute an interview. This recertification should still be documented as a desk RRED, with an interview required in six months.
4. Ms. D files a non-interview RRED on August 8 to recertify benefits for September. During the prior certification period, she started a job at The Gas Station which didn't require verification at the time. On the RRED, she reports no income.  
  
You can attempt to call her to clarify what happened to the job at The Gas Station. If you don't reach her, or if you reach her and further verification is required, an RFI must be sent requesting verification of her job, including ending information if applicable.
5. Mr. E files a non-interview RRED on September 3 to recertify benefits for October. During the past certification period, there were multiple changes reported for which verification was not required. Since you know you need to clarify his situation and that verification may not be needed for some of the changes, you determine it would be easier to resolve all of the information by conducting an interview. This will likely minimize the amount of verification requested.  
  
Document the reason for scheduling an interview and proceed with processing of this RRED as an "interview" RRED. An interview will not be required in six months.
6. Ms. F files a non-interview RRED on October 6 to recertify benefits for November. There was one change reported during the prior certification period which must be clarified. You call her to do this, and she starts to inform you of multiple other changes that will need to be resolved.  
  
Because of the complexity of her situation, you determine it would be easier to conduct a full interview. Review the entire RRED and send a request for any necessary verification.  
  
Document the reason for conducting an interview and proceed with processing of this RRED as an "interview" RRED. An interview will not be required in six months.

## **Determining Eligibility and Benefits**

Legal reference: 7 CFR 273.10(a)(2), 441 IAC 65.23(234)

**Policy:** When processing an application for recertification:

- See [Timely Processing a RRED](#) and [Delays in Processing a RRED](#) for processing time frames and effective dates.
- Base eligibility and benefits for the new certification period on the household's anticipated circumstances.

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

1. Determine household composition based on what is anticipated for the first day of the new certification period.
2. Calculate a new income estimate. Follow the policies in [7-F](#).
3. Determine the household's allowable deductions. For determining deductions, see [7-E, Income](#).
4. Determine the household's resources, based on what is anticipated for the first day of the new certification period. For determining resources, see [7-D, Resources](#).

For future changes reported at the time of recertification, see [7-B, Handling Future Changes Reported at Application](#).

## **Timely Processing a RRED**

Legal reference: 7 CFR 273.10(g)(2), 273.14(c), 273.14(d)

**Policy:** Households that have filed a timely RRED and met all recertification requirements are to be notified of their eligibility or ineligibility by the end of the current certification period. Eligible households must be provided an opportunity to participate by their normal issuance cycle in the first month of the new certification period.

**Comment:** When processing a RRED after the end of the certification period, see [Delays in Processing a RRED](#).

## **Delays in Processing a RRED**

Legal reference: 7 CFR 273.14(e)

When processing a RRED after the end of the certification period, refer to whichever of the following sections is appropriate:

- [RRED Filed Before the End of the Certification Period](#)
- [RRED Filed After the End of the Certification Period](#)

### **RRED Filed Before the End of the Certification Period**

Legal reference: 7 CFR 273.14(e)(1) and (2), 273.14(f)

If the RRED is not processed by the end of the certification period because of an agency delay, continue to process the case and provide a full month of benefits for the first month of the new certification period.

If the RRED is not processed by the end of the certification period because the household caused a delay after filing the RRED, continue to process the case and prorate from the date the household takes the last required action. The household may cause a delay by missing its scheduled interview or failing to provide requested information by its due date.

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

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

1. Ms. T files a RRED on April 5 to recertify benefits for May. Requested verification, due by April 18, is not provided. The application for recertification is denied. Ms. T returns all needed information on May 10. The recertification is approved and benefits are prorated from May 10.

2. Mr. C files a RRED on June 2 to recertify benefits for July. The household misses its scheduled interview and a SNAP *Notice of Missed Interview* and denial notice (notice reason 523) is sent on June 12.

Mr. C reschedules an interview for June 25. During the interview, the worker determines additional information is needed. A 10 day written request is issued and the information is due by July 5.

If the household returns the information early and it is received by June 30 (the last day of the certification period), benefits will not be prorated. The effective date will be July 1.

If the household returns the requested information after June 30 (the last day of the certification period), benefits will be prorated from the date the information is received because the household caused a delay by missing its scheduled interview. NOTE: If the information is returned later than July 30, the household will have to reapply.

3. Ms. J files a RRED on May 28 to recertify benefits for June. Requested verification, due by June 8, is provided on June 8. The RRED was filed untimely but the household did not cause a delay after filing the RRED. The recertification is approved and the household is entitled to a full month of benefits for June.

4. Ms. G files a RRED on April 20 to recertify benefits for May. Requested verification, due by April 30, is provided on May 6. The recertification is approved. Because the household caused a delay in processing, benefits are prorated from May 6.

### **RRED Filed After the End of the Certification Period**

Legal reference: 7 CFR 273.14(e)(3), 273.14(f)

If a household files a RRED within 30 days after the end of the certification period, the RRED shall be considered an application for recertification. However, as with an initial application, prorate benefits based on the filing date. Also, because the RRED is treated as an application, an interview is required for all RREDs filed within 30 days after the end of the prior certification period.

Follow the processing standards below that are used for initial applications. If the household:

Meets the criteria at [7-B, Determining Eligibility for Emergency Service](#), provide emergency services.

Fails to appear for an interview, send a *Notice of Missed Interview*. Be sure to use notice reason 522 (not 523). Because this is treated like an initial application, you must wait to deny on the 30th day.

Is denied for failure to provide requested information but later returns it within 30 days of filing the RRED, reopen back to the RRED filing date.

Is denied for failure to provide requested information but later returns it more than 30 days after filing the RRED but within 60 days, reopen and process. See [7-B, Delays in Processing](#) to determine the effective date.

## **Case Documentation**

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

**Policy:** The case record must be documented to support each determination of eligibility, ineligibility, or benefit level. The case must be documented in sufficient detail to permit a case reader, quality control reviewer, or another worker to determine the reasonableness and accuracy of each determination.

**Procedure:** Good documentation is the key to accurate cases. When you are projecting a household's future circumstances, it is critical to record how and why you came to your decisions on the household's eligibility and benefit level.

If your projections do not prove to be true, the case will be correct if you, the household, and other sources all took correct actions at the time of the application or recertification and those actions are documented to show that the projection was reasonable. A quality control reviewer needs to know:

- The period of time you used as representation of future income;
- Why you did or didn't use income amounts in calculating the projection;
- The actual calculation performed to project income.