



# SNAP 1501-1

## CASE MANAGEMENT

### Reporting Requirements

**Supersedes:** SNAP 1501-1 (04/06/2023)

**Reference:** 7 CFR 273.10, 7 CFR 273.12, 7 CFR 273.13, 7 CFR 273.12(c)(3)(iii), 7 CFR 273.14

**Overview:** There are two different Household Reporting Requirements for SNAP: **Change Reporting Households** and **Simplified Reporting Households**.

The following households are subject to Change Reporting requirements:

1. Migrant/seasonal farm worker households; and,
2. Households in which all members are elderly or disabled and do not have countable earned income.

All other households are required to report changes according to Simplified Reporting Requirements.

#### **CHANGE REPORTING HOUSEHOLD REQUIREMENTS**

Change reporting households are required to report changes, including #10 Lottery and Gambling winnings, within 10 days of the date the change becomes known to the household. For reportable changes of income, the change must be reported within 10 days of the date the household receives the first payment attributable to the change. Change reporting households are required to report the following changes in circumstances:

1. Changes in sources of income, including starting or stopping a job or changing jobs if the change in employment is accompanied by a change in income.
2. Changes in the amount of earned income of more than \$125 a month from the amount last used to calculate the household's allotment, provided that the household is certified for no more than 6 months.
  - a. **NOTE:** This only applies to migrant/seasonal farm worker households because households in which all members are elderly or disabled with countable earned income are subject to Simplified Reporting requirements.
3. Changes in the amount of unearned income of more than \$125.00 a month, except changes relating to TANF. Eligibility staff are responsible for identifying changes during the certification period in the amount of TANF.
4. Changes in household composition, such as the addition or loss of a household member.
5. Changes in residence and the resulting changes in shelter expenses.
6. Changes in liquid resources, such as cash, stocks, bonds, and bank accounts that reach or exceed the resource limits of \$2,750 or \$4,250 depending on household composition, unless these assets are excluded.
7. Acquisition of a licensed vehicle that is not fully excludable.
8. Changes in the legal obligation to pay child support; and,
9. For able-bodied adults subject to the time limit, any changes in work hours that bring an individual below 20 hours per week, averaged monthly. An individual shall report this information in accordance with the reporting system for income to which they are subject.

10. Whenever a member of the household wins substantial lottery or gambling winnings of \$4,250 or greater. **See section titled “Substantial Lottery or Gambling Winnings” later in this policy.**

An applying household shall report all changes related to its SNAP eligibility and benefits at the certification interview. Changes outlined above which occur after the interview but before the date of the notice of eligibility, shall be reported by the household within 10 days of the date of the notice.

### **RECERTIFICATION PERIODS FOR CHANGE REPORTERS**

Eligibility is determined for a 24-month certification period at application and recertification for households in which all members are elderly or disabled and do not have countable earned income. Eligibility is determined for a six-month certification period for migrant/ seasonal farm worker households at application and recertification.

### **CHANGE REPORT FORM AND NOTICE**

Households are provided with a Change Report Form at or when:

1. The application interview.
2. The recertification interview.
3. Following a reported change; and,
4. When requested.

### **NOTIFICATION OF CHANGE REPORTING REQUIREMENTS**

At the initial certification, recertification, and when the household is transferred to Change Reporting, eligibility staff must provide the household with the following:

1. A written and oral explanation of how change reporting works.
2. A written and oral explanation of the change reporting requirements including:
  - a. The additional changes that must be addressed and verified in the Recertification Form.
  - b. When the Recertification is due.
  - c. How to obtain assistance in filing the Recertification or make any change reports; and
  - d. The consequences of failing to file the report.

### **SIMPLIFIED REPORTING REQUIREMENTS**

Simplified reporting requires households to report when their gross monthly income exceeds 130% FPL (the gross monthly income (GMI) standard) for their household size. The household will use the GMI for the household size that existed at the time of its most recent certification or recertification, regardless of any subsequent household size changes. Income is only adjusted on the case if it is expected to continue at the higher amount.

**NOTE:** If, at application or recertification, an applying household **meets these three criteria, they are not required to report an increase in income until the Simplified Report**

1. Has income that exceeds 130% of the poverty level for its household size,
2. Is CE/ECE, and
3. Is eligible to receive any benefit amount

Able-bodied adults subject to the time limit, must report any changes in work hours that bring an individual below 20 hours per week, averaged monthly.

Simplified Reporting Households must also report whenever a member of the household wins substantial lottery or gambling winnings of \$4,250 or greater. **See section titled “Substantial Lottery and Gambling Winnings” later in this policy.**

For reportable changes of income and substantial lottery or gambling winnings of \$4,250 or greater, households subject to simplified reporting are required to report changes by the 10th of the following month. For example, if the reportable change occurred on June 17<sup>th</sup>, the household must report by July 10<sup>th</sup>. The household is also required to report by the 10th of the following month when an ABAWD's work hours decrease below 20 hours per week, averaged monthly. Adjustment to ABAWD exemption based on hours worked is only made on the case if the decreased hours are expected to continue.

Simplified reporting also requires households to complete a Simplified Report. Eligibility is determined for most Simplified Reporting households for a 12-month certification period at application and recertification. The Simplified Report is due six months from the initial month that the application or recertification is approved.

An interview is not required as part of a Simplified Report. All required interfaces must be checked when processing a Simplified Report.

### **SUBSTANTIAL LOTTERY AND GAMBLING WINNINGS**

**ALL** households, whether Change Reporters or Simplified Reporters, must report whenever a member of the household wins substantial lottery or gambling winnings of \$4,250 or greater. Lottery or gambling winnings are defined for this requirement as a cash prize won in a single game, before taxes or other amounts are withheld. If multiple individuals shared in the purchase of a ticket, hand, or similar bet, then only the portion of the winnings allocated to the member of the SNAP household will be counted toward the eligibility determination. Households with substantial lottery or gambling winnings defined in this section immediately lose eligibility for SNAP benefits.

Households disqualified for substantial winnings remain ineligible until they again meet the allowable financial resources and income eligibility requirements. This provision applies to all households, including categorically eligible, Social Security Income (SSI), and Temporary Assistance for Needy Families (TANF) households, and those certified under Expanded Categorical Eligibility (ECE). The next time such a household reapplies and is **certified** for SNAP after losing eligibility under this rule, the household would not be considered categorically eligible or ECE. The household would need to be certified under regular SNAP rules.

To make the correct SNAP determination under regular rules, households must PASS the GMI 130% FPL test first. After that they have to pass the resource test. Once they pass both of those then we would look at the NMI 100% FPL test. For those regular rule households that have an elderly or disabled individual there is no GMI test, but they must pass the resource test of \$4,250.00 and the NMI income test.

Households disqualified for substantial lottery or gambling winnings are not permanently disqualified.

1. If the HH is disqualified and SNAP closed, they can reapply and be eligible if ANYTHING about their HH composition (a new member or a member leaving) is changed. A change in HH composition makes the HH a NEW HH, so they can be considered under CE and ECE eligibility rules. If the HH reports a change in HH composition before the actual closure of their SNAP benefits, re-open and authorize without a hard close. If the member who won the lottery or gambling winnings joins a new HH, the new HH is not disqualified, because it is a new HH (the composition changed).
2. If a HH is disqualified under this rule and reapplies and is certified under regular SNAP rules, but then becomes ineligible under regular SNAP rules (e.g., income increases to greater than 130% FPL), they can be certified and receive benefits under CE and ECE eligibility rules.
3. If a HH is disqualified under this rule, later reapplies, and is certified under regular SNAP rules, but at recertification they exceed the income limits under regular rules, they can be recertified under CE and ECE eligibility rules. This is because a "re-certification" is a type of new application for a new certification period.

### **NOTIFICATION OF SIMPLIFIED REPORTING REQUIREMENT**

At the initial certification, recertification, and when the household is transferred to simplified reporting, eligibility staff must provide the household with the following:

1. A written and oral explanation of how simplified reporting works.

2. A written and oral explanation of the reporting requirements including:
  - a. The additional changes that must be addressed in the Simplified Report and verified.
  - b. When the report is due.
  - c. How to obtain assistance in filing the Simplified Report; and
  - d. The consequences of failing to file the report.

### **SIMPLIFIED REPORT FORM**

The Simplified Report form must request information for the following changes:

1. Changes in sources of income such as child support, starting a new job, changed jobs, etc.
2. Changes in the amount of earned income of more than \$125.
3. Changes in the amount of unearned income of more than \$125.
4. Changes in household composition.
5. Changes in residence and the resulting changes in shelter and utility expenses.
6. Resources reaching or exceeding resource limits in SNAP 400; and,
7. Changes in the legal obligation to pay child support.
8. For able-bodied adults subject to the time limit, any changes in work hours that bring an individual below 20 hours per week, averaged monthly.

At the time of the simplified report, the eligibility staff member must act on changes reported during the simplified report period or changes reported on the Simplified Report form whether the household was required to report the change and whether the change causes benefits to decrease.

### **SIMPLIFIED REPORT PROCESSING**

If the household files a complete report resulting in reduction or termination of benefits, the eligibility staff member shall send an adequate notice. The notice must be issued so that the household will receive it no later than the time that its benefits are normally received. If the household fails to provide sufficient information or verification regarding a deductible expense, the eligibility staff member will not terminate the household, but will instead determine the household's benefits without regard to the deduction.

If a Simplified Report is received by the 3<sup>rd</sup> of the month, it must be processed with time to provide the household with adequate notice. If the household fails to provide sufficient information or verification regarding a deductible expense, SNAP benefits are not closed, but ongoing eligibility is determined without allowing the expense.

If a Simplified Report is not received by the 3<sup>rd</sup> day of the report month, a reminder notice must be mailed on the next business day advising the household that it has 10 days from the date the notice is mailed to file the report. After the 10<sup>th</sup> day of this notice, SNAP benefits are closed, and a closure notice is sent.

If the report is received after the 3<sup>rd</sup> day of the report month, but within 10 days of the date the reminder notice is mailed (before the closure notice), the eligibility staff member must process the report in time to allow adequate notice of a reduction or termination of SNAP benefits.

If the household files a Simplified Report after SNAP has been closed but before the end of the report month, the eligibility staff member must re-open the SNAP program and process the report. If information/verification is required, a 10-day notice is sent and if the household provides the information during this 10-day period or prior to the end of the report month, the eligibility staff member determines eligibility and sends appropriate notice. If the 10-day notice period extends beyond the report month, benefits are not prorated.

If the household has requested a fair hearing on the basis that they submitted a complete Simplified Report, but the State does not have it, the eligibility staff member will reinstate the household if a completed Simplified Report is received before the end of the issuance month.

The combined Simplified Report for SNAP and TANF shall clearly indicate on the form that SNAP-only households need not provide information required by another program. Non-applicant household or family members need not provide SSNs or information about citizenship or immigration status.

### **SIMPLIFIED REPORT RECEIVED AFTER REPORT MONTH**

Households are required to reapply for benefits if a Simplified Report is not received by the last day in the report month. If the last day of the report month falls on a weekend or holiday, the household has through the next business day to submit the report.

### **ACTING ON CHANGES GENERAL**

Eligibility staff must act on reported changes within 10 days of report, regardless of whether the change was reported timely, to determine if the change affects the household's eligibility or allotment.

Changes reported over the telephone or in person by the household must be acted on in the same manner as those reported on a change report form. If a household reports a change in income, and the new circumstance is expected to continue for at least one month beyond the month in which the change is reported, the eligibility staff must act on the change.

Reported/discovered information may come from the household, data matches used in eligibility determinations, or credible third-party sources, e.g., other State or Federal agencies. Information from data matches or third-party sources must follow procedures under ACTING ON UNCLEAR INFORMATION.

Changes in medical expenses reported by a source other than the household are acted on if the changes are considered verified upon receipt and do not require contact with the household.

When a household reports a change in residence, the State agency must investigate and act on potential changes in shelter costs arising from this reported change by sending a pend notice. However, if a household fails to provide information regarding the associated changes in shelter costs within 10 days of the notice, the State agency should send a notice to the household that their allotment will be recalculated **without the deduction**.

**NOTE:** SNAP households CANNOT be required to verify reported/discovered information from data matches and third-party sources that does not meet Simplified Reporting requirements. **The two exceptions to this are the Death Match and Prisoner Match. We must act on information found on these data matches.** (7 CFR 273.12(c)(3)(iii), 7 CFR 273.13, 7 CFR 273.14). Please refer to related Business Processes in these situations.

**NOTE:** See section **ACTING ON UNCLEAR INFORMATION** later in this section for criteria about unclear information before acting on changes.

If a reported/discovered change would increase the benefit and requires verification, the eligibility staff member must send a request for verification allowing the household 10 days to submit. If the household complies within 10 days, the agency must make the change effective no later than the first benefit allotment issued 10 days after the **change was reported by the household**. For example, a \$30.00 decrease in income reported on the 15<sup>th</sup> of May would increase the household's June allotment. If the same decrease were reported on May 28<sup>th</sup>, the increase would be effective for July benefits. If the household fails to provide the verification within 10 days, the increase/change would take effect in the month following the **date the verifications were received**. 7 CFR 273.12(c)(1)(i) and (iii)

When the increase in benefits is caused by **adding an additional household member or decreases in income of more than \$50.00**, the household must receive the increased benefits in the month following the reported change. If the change is reported late in the month (not allowing 10 days), a supplement for the next month will need to be authorized. If the necessary verification is not received SNAP benefits do not close and SNAP benefits continue to be issued at the previous level. 7 CFR 273.12(c)(1)(ii) and (iii)

If a reported/discovered change would decrease the benefit and requires verification, the eligibility staff member must send a request for verification allowing the household 10 days to submit. If the requested verification is received within the 10-day request period AND timely notice can be provided to the household, the household's benefit is decreased accordingly. If the requested verification is not received in time to provide timely notice of adverse action or the 10-day request for information period extends into the next benefit month, the household's benefit is authorized at the same benefit amount as the previous month. If the verification, such as a decreased expense, is not received, the expense is removed, and timely notice of decrease is provided to the household.

### **ACTING ON UNCLEAR INFORMATION**

Unclear information is information about a household's circumstances from which the eligibility staff member cannot readily determine the effect on the household's continued eligibility for SNAP or in certain cases the effect on the benefit amount. Unclear information is information that is not verified, or information that is verified but the eligibility staff member needs additional information to act on the change appropriately. For example, if a household reports and verifies that a new member has joined the household but does not provide any information regarding the new member's income, the eligibility staff member would need to contact the household before the eligibility staff member could act to add the individual to the household and change the benefit level.

If the information is verified upon receipt but the eligibility staff member needs additional information to act on the change appropriately, then the information would be considered unclear. An example of this would be if the eligibility staff member received verified upon receipt information, such as a client statement that another person joined a household but did not know how the household's total monthly income may have changed. The eligibility staff member would need further information and verification from the household to make the appropriate changes in benefit allotment, if necessary, to the case.

Eligibility staff must follow up on unclear information if the information:

1. Is fewer than 60 days old relative to the current month of participation, and
2. Was required to have been reported based on the reporting system to which the household was assigned.

### **Procedures for responding to unclear information are applicable to ALL households, not just those subject to Simplified Reporting.**

If the unclear information received is fewer than 60 days old relative to the current month of participation and indicates there has been a change in household circumstances that the household should have reported according to the household's assigned reporting system, the eligibility staff member must send a pend notice. If the unclear information indicates that there was a change in household circumstances, but not a change the household was obligated to report, the eligibility staff member will follow up on the information with the household at its next certification action or required periodic report. This eliminates the potential for terminating eligible households from SNAP based upon changes that they were not required to report and saves time spent following up on minor changes.

Eligibility staff members are also required to send a pend notice if the unclear information appears to present significantly conflicting information about household circumstances from that used at the time of certification.

**Significantly conflicting information** is any situation in which the agency has just received new information which calls into question whether the information presented at application or recertification was accurate or not. See examples below:

**Example 1:** A household of 1 applies and is approved for benefits. During the certification, the agency learns that the customer is living with others and had been at the time the application was submitted. It is now *unclear* what the relationship of these other individuals is to the head of household, and whether the household should have been approved as a household of 1 because this new information *significantly conflicts* with what was reported at the time of application.

**Example 2:** A household of 3 submits a recertification reporting no changes and is reapproved for benefits. During the new certification period, the agency learns that one of the household members is a college student whose semester began prior to the new certification period. It is now *unclear* if this household member should have been included in the SNAP household because the new information *significantly conflicts* with the information the agency had when processing the redetermination.

Eligibility staff may follow up with a general notice to the household allowing ten days to provide information on a **voluntary basis** if that information would result in an increase in benefits, but the State may not take adverse action if the household does not respond. In these instances, we would not PEND the case, we would send a general notice allowing the household 10 days to submit verification voluntarily. Benefits increase the month after a reported/discovered change has been submitted if the verifications are submitted within 10 days. If verifications are submitted in excess of 10 days, the change will go into effect the month following the date the verifications were received.

### **How do eligibility staff respond to unclear information about households subject to Change Reporting?**

If an eligibility staff member receives unclear information about a household that is fewer than 60 days old relative to the current month of participation and would, if accurate, have to be reported per reporting requirements, the eligibility staff member must send a pend notice and follow procedures for making changes.

If the unclear information appears to present significantly conflicting information from that used at the time of certification, the eligibility staff must send a pend notice and follow the procedures for making changes.

If the information is not fewer than 60 days old relative to the current month of participation, was not required to be reported, or does not present significantly conflicting information from that used at the time of certification, the eligibility staff shall not act on this information or require the household to provide information until the household's next certification action.

For example, if eligibility staff received unclear information that is fewer than 60 days old relative to the current month of participation and indicates a Change Reporting household's income increased by \$200, the eligibility staff would need to send a pend notice because the household is required to report changes in income of \$125 or more. If, however, this information was older than 60 days relative to the current month of participation, the eligibility staff would not send a pend notice to the household and would wait until the next scheduled contact to follow up with the household. **NOTE-** When applying the 60-day filter to unclear information please use the date of the change relative to the month it was reported to determine the age. Consider only if the actual change happened more than 60 days **before it was reported**. For example: If a change is reported on 03/25/2023 for a change that occurred on 02/27/2023, it was less than 60 days old at the time of the report even if we don't work the task until a much later date. In this situation, we would need to act on the change. Conversely, if a change was reported on 03/25/2023 that occurred on 12/01/2022, it was more than 60 days old by the time we aware of the change and must **be held until the next review**.

### **How do eligibility staff respond to unclear information about households subject to Simplified Reporting?**

If eligibility staff receives unclear information about a household outside of the Simplified Report that is fewer than 60 days old relative to the current month of participation and would, if accurate, have to be reported, the eligibility staff must send a pend notice and follow the procedures for changes.

If the unclear information appears to present significantly conflicting information from that used at the time of certification, the eligibility staff must send a pend notice and follow the procedures for making changes. \*\*\*See definition and examples of significantly conflicting information above. \*\*\*

If the information is not fewer than 60 days old relative to the current month of participation, was not required to be reported or does not present significantly conflicting information from that used at the time of certification, the State agency shall not act on this information or require the household to provide information until the household's next certification action.

For example, if eligibility staff received unclear information that indicates a Simplified Reporting household's income increased by \$200, but this increase did not exceed the household's reporting requirement or the increase is not within 60 days of the current month of participation, no pend notice would be issued and the change would be dealt with at the time of the next certification action. PLEASE SEE GUIDANCE REGARDING THE 60-DAY FILTER ABOVE.

**Effective Date:** October 1, 2023