



## SNAP 103-5 APPLICATION PROCESSING Verification

**Supersedes:** SNAP 103-5 (01/20/2020)

**Reference:** 7 CFR 273.2(f); 7 CFR 273.2 (b)(1)(i); 7 CFR 273.14(b)(4); Federal Register/Vol. 77, No. 156

**Overview:**

Verification is the use of documentation or a contact with a third party to confirm the accuracy of statements or information. Households must be given at least 10 days to provide verification. If the last day to provide verification falls on a weekend or holiday, households are allowed through the next business day to submit the verification.

**NOTE:** Requests for verification listed on application and recertification approval notices are not considered 10-day request for verification notices. Also, the notice, SNAP Benefit Notice of Expiration (with required interview information) is not considered a 10-day request for information notice. A separate notice after the interview but prior to authorizing benefits must be sent allowing the household at least 10 days to provide verification.

At application, when adding a new household member, and at recertification, eligibility staff must query available computer systems. These systems are eDRS (nationwide list of disqualified individuals), SEARCHS (child support), MISTICS (wages and unemployment), SOLQ (social security), property search, etc. to establish the accuracy of statements on the application/recertification. At the Simplified Report, eligibility staff must query computer systems for information that is available and is pertinent to the case.

If there is a match in the eDRS, eligibility staff must contact the originating state and allow the state 20 days to provide the disqualification verification. If the verification is not received within 20 days, the eligibility supervisor notifies the SNAP Policy Specialist.

**NOTE:** This requirement does not change the expedited SNAP process. Identity is the only required verification for an expedited case. Eligibility staff must continue to process expedited benefits timely; however, for ongoing benefits the eDRS match must be conducted prior to eligibility determinations.

If the originating state fails to provide documentation within the 20 day timeframe, the eligibility staff member must determine eligibility if otherwise eligible. If the originating state later verifies the eDRS

match, the eligibility staff member is required to apply the SNAP disqualification, provide the household a notice of adverse action (1503-1) and establish an overpayment.

If the eligibility staff member could have known information at Application, Recertification, Simplified Report, or when adding a household member via a query but does not query or does not correctly query the other computer systems, it is considered an agency caused error.

### **DUE DATES FOR VERIFICATION:**

If an application has been processed/issued as expedited and verification(s) are needed for ongoing benefits, eligibility staff sends a notice allowing the household at least 10 days or to the end of the expedited issuance period, whichever is longer to provide requested verification.

If an application is being processed under regular processing procedures:

- The eligibility staff member denies the application 10 days after the verification request date when an applicant fails to provide the required verification, provided that the household was interviewed.
- The OPA informs households of the 10-day standard in writing and notifies households at the interview of the date any missing verification must be provided.
- The OPA will not deny an application for failure to provide any missing verification within 10 days unless an interview was completed.
- The OPA assists households in obtaining verifications.
- Households that fail to provide required verification after the 10-day period may be denied. If the verification is provided within 60 days of the application date, the OPA acts on the verification without requiring a new application.
- If the household provides missing verifications within the initial 30-day period, the OPA reopens the application and if eligible, provides benefits from the applications date. If the household does not provide the missing verification until the second 30 days after filing an application, the OPA reopens the application and provides benefits from the date the household furnished the missing verification.

When a Recertification, Simplified report, or an ongoing case is processed, eligibility staff must send a notice allowing the household at least 10 days to provide requested verification.

### **TYPES/SOURCES OF VERIFICATION:**

Types of verifications include:

1. **Documentary evidence** is written confirmation of a household's circumstances. **It is used as the primary type of verification.** Although documentary evidence is the primary type of verification, acceptable verification is not limited to a single type of document and may be obtained through the household or other source. Eligibility staff must document the documentary verification source, the information verified, and the date the verification was received in case notes.

2. **Collateral Contact** is an oral confirmation of a household's circumstances by a person outside of the household. The collateral contact may be made either in person or by telephone. The OPA may choose a collateral contact if the household does not designate one or designates one that is not acceptable. The eligibility staff member should only disclose the information that is absolutely necessary to obtain the needed information. When talking to a collateral contact, eligibility staff should try to avoid disclosing that the household is applying for SNAP benefits and try to avoid disclosing any information the household supplied. If a collateral contact is used to verify the information, case notes must be documented with the collateral contact's name and phone number, the information verified, and the date the information was verified.
3. **A Home Visit** may be used as verification only when documentary evidence is insufficient or cannot be obtained to make an accurate eligibility determination. A home visit must be scheduled with the household in advance.

## **RESPONSIBILITY FOR PROVIDING VERIFICATION:**

The household has the primary responsibility for providing documentary evidence to support statements on the application and to resolve any questionable information. Households may provide verification in person, through the mail, fax, e-mail, or through an authorized representative. The eligibility staff member will assist the household as long as the household is cooperating with the application process.

**NOTE:** A client has authorized federal, state, and local agencies to verify information if needed to determine eligibility by signing the 'Application for Assistance'. The 'Release of Information' is NOT required but is a useful tool when businesses, agencies, etc. will not release information without a signed release of information statement.

## **VERIFICATION AT APPLICATION:**

The following information must be verified prior to SNAP eligibility determination and issuance for non-expedited application processing:

1. **Residency** – verify to the extent possible in conjunction with verification of other information. If verification cannot be accomplished in conjunction with the verification of other information such as rent/mortgage payment, a utility expense, identity, etc. eligibility staff may use a collateral contact or other readily available documentary evidence.  
There is no durational residency requirement. The household is not required to reside in a permanent dwelling, or have a fixed mailing address, or demonstrate intent to reside permanently in the state.  
Applicants living anywhere in Montana for any purpose other than a vacation, regardless of the length of time they have been in Montana or plan to stay, meet residence requirements. Persons living in tents, vehicles, campers, under bridges, campsites, etc. meet residence requirements.

An application must not be denied if the eligibility staff member and the household have made a reasonable effort to verify residency but verification is difficult to obtain.

2. **Identity** – verify the identity of the person making the application. If an authorized representative applies on behalf of a household, the identity of both must be verified. Identity may be verified through readily available documentary evidence, or through a collateral contact. Acceptable verification may include but is not limited to: driver's license, work or school I.D., I.D. for health benefits or for another assistance or social service program, birth certificate, Social Security card, and wage stub.

Any documents reasonably establishing the identity must be accepted and not requirement for a specific type of document such as birth certification can be required. Only one document that establishes identity can be required.

3. **Eligible alien status** – verify each alien applicant's eligibility status. Alien status is normally verified through U.S. Citizenship and Immigration Service (USCIS) Forms I-94, I-151, Passport, G-641, or I-688 (SNAP 301-2)

If an individual chooses not to provide verification of their eligible alien status and does not want eligibility staff to contact USCIS to verify their immigration status, the household may choose to withdraw the application or to participate without that member's needs included in the benefit determination.

4. **Social Security Number (SSN)** – verified through the agency system interface with SSA. Hard copy verification is not required. Providing a SSN for each household member is voluntary. However, if a SSN is not provided, the individual cannot participate in SNAP unless the individual meets good cause. (SNAP 303-1)

Eligibility determination or benefit issuance must not be delayed to an otherwise eligible household solely to verify another household member's SSN. Once a SSN is verified the eligibility staff member must make a permanent notation in its file to prevent the unnecessary re-verification of the SSN in the future.

If an individual does not have or is unable to provide a SSN and wants to participate in SNAP, the individual must apply for a SSN.

If the household is unable to provide proof of a newborn's SSN application, the household must provide the SSN or proof of application at its next recertification or within six months following the month the baby is born, whichever is later. If the household is unable to provide a SSN or proof of SSN application within those time frames, the eligibility staff determine if good cause is applicable (SNAP 303-1).

Generally, the SSN application process begins while the mother is still in the hospital. If a newborn's SSN application is made prior to the mother leaving the hospital, the SSN application from the hospital is acceptable verification.

5. **Household composition** – verify factors affecting the household composition, **if questionable.**
6. **Disability** – verify the individual meets the definition of disabled defined in the glossary (SNAP 0-4).

Acceptable verification includes but is not limited to the client receiving Supplemental Security

Income (SSI), Social Security disability/blindness benefits, or Veterans Administration (VA) benefits due to being 100% disabled.

7. **Student status** – verify eligible student status (SNAP 201-5).
8. **Gross non-exempt income** – verify all non-exempt income. Interest income, of any amount, received by a household, must be verified.

Acceptable verification includes but is not limited to: pay stubs, W-2 forms, employer wage verification form, income tax forms and returns, bookkeeping records, bank account statements, sales and expenditure records, award letters (unemployment insurance, Veteran's Administration, pension, Railroad Retirement); support and alimony payments (court order, divorce decree, or separation papers); contribution checks; benefit warrants, current SDX or BENDES interfaces, SEARCHES, and MISTICS for Montana unemployment insurance (SNAP 500 through SNAP 503-2).

If the household cannot provide acceptable documentary proof of income, they must identify a collateral contact that eligibility staff can contact to obtain the verification. When all attempts to verify the income are unsuccessful because the person or organization providing the income does not cooperate with the household or OPA and all other verification sources are not available, the best available information is used to determine the amount to prospectively budget.

9. **Deductible expenses:** The eligibility staff member will assist the household with obtaining verification when required as long as the household is cooperating with the application process. If the client reports an expense but doesn't submit verification (when required), the expense is removed and eligibility is determined without it.

- a. **Child support obligation** – verify the household's legal obligation to pay child support, the obligation amount, and monthly amount of child support the household actually pays.

Acceptable verification may include but is not limited to: canceled checks, wage withholding statements, verification of withholding from unemployment compensation, statements from custodial parent, and SEARCHES (SNAP 602-2).

- b. **Medical expenses** – verify medical expenses including the reimbursement amount (SNAP 602-3).

When documentary evidence cannot be obtained or is insufficient to determine the deduction amount, eligibility staff should reasonably attempt to verify information with a collateral contact (SNAP 602-3).

- c. **Shelter expenses** – all allowable shelter expenses must be verified. (SNAP 602-4).

- d. **Utility expense** – the household's obligation to pay for heating, cooling, cooking fuel, electricity, water, sewage, garbage, and telephone expenses including charges for initial installation of the utility must be verified. (SNAP 602-4).

Acceptable forms of verification includes but is not limited to: utility bills, canceled checks, copies of money orders, landlord form completed by the landlord.

- e. **Dependent care** – Client statement can be used to verify day care payments including reimbursements for actual costs for the care of children or other dependents when

necessary for a household member to accept or continue employment, seek employment, comply with employment or attend training, or pursue education preparing for employment. If reported expense is questionable, documentation or collateral contact is required. (SNAP 602-2).

10. **Questionable information** – verify all information that is inconsistent, incomplete, or outdated.
  - a. **Inconsistent information** – the household’s statements on the application or during the interview are contradictory, do not agree with information in the case file/CHIMES, or do not agree with information the eligibility staff member knows to be factual. The household must be given at least 10 days to resolve the discrepancy prior to an eligibility determination when information from another source contradicts statements made by the household.
  - b. **Incomplete information** – gaps in information that is facts.
  - c. **Outdated information** – is information too old to be considered valid. It depends on the particular piece of information in question whether or not it is considered outdated.

#### **VERIFICATION AT RECERTIFICATION:**

Unchanged information is not re-verified at recertification unless the information is incomplete, inaccurate, inconsistent or outdated. The following information is verified:

1. Change(s) in income if the source has changed or the amount has changed by more than \$50. Income verification is not required if the source has not changed and the amount is unchanged or has changed by \$50 or less, unless the information is incomplete, inaccurate, and inconsistent or outdated. This provision also applies to changes reported during the certification period.  
**NOTE:** Generally, income that fluctuates from month to month changes more than \$50 and is verified at recertification.
2. Previously unreported shelter expenses-utility expenses, rent/mortgage, homeowner’s insurance, property taxes, must be verified. (SNAP 602-4)
3. Previously unreported medical expenses and total recurring medical expenses that changed by more than \$25. Verification of total medical expenses claimed by the household that have not changed or have changed by \$25 or less are not required unless the information is incomplete, inaccurate, inconsistent, or outdate.
4. Change(s) on the household’s legal obligation to pay child support, the obligation amount, and monthly child support amount the household actually pays to a non-household member. Reported unchanged information is not verified unless the information is incomplete, inaccurate, inconsistent, or outdated.
5. An able-bodied adult without dependents must verify work hours if they are meeting the work requirement by working, participating in the SNAP Employment and Training program, or by participating in a work program that is not operated or supervised by the state.
6. Other information that has changed, such as dependent care, student status, fleeing felon, drug conviction, etc. Unchanged information is not verified unless the information is incomplete, inaccurate, inconsistent, or outdate.

**Effective Date:** May 01, 2021