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On Target

November '14 Contributors

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Looking for the materials from the 2014 Accuracy Summit?
The link is here:
[Accuracy Summit Training Resources](#)

2014 Accuracy Summits Questions and Answers

The 2014 Accuracy Summits were a huge success. Eight Summits were held and over 800 people participated. This November issue of the On Target addresses a sampling of the Q&A from the Summits. Please see transmittal [SS-PT-14-027](#) for a complete list of questions and answers.

SNAP - Verification

Q. Can SSA records be used to verify ID? What about a person's social security card-can we use to verify ID? Work # as well?

A. Yes, DHR screens, including SSA records and other screens available to the agency can be used to verify identity.

Q. Is there a website or phone # that we can access to get an accurate amount for disability income, pensions etc.?

A. Eligibility should only be determined using approved mainframe screens and the Work Number. Verification can be obtained by contacting an employer or agency as long as you have a signed application and speak to a representative. Please NOTE: The interactive 1-800 number for verifying VA benefits should not be used since it is for the client's use and verifies only the net deposit.

It is not acceptable to browse Google, Facebook, Twitter, Instagram, Snapchat that or access other social media or websites for verification purposes.

Q. When a client claims income for something illegal or under the table and refuses or cannot turn in verification of income received, do we narrate the "Job" and reason why client states they do not want to provide verification? Do we deny for refusing to provide income?

A. Verification of income is required to determine eligibility for SNAP. While the application can be denied if verification is not provided as requested there are some exceptions.

Have a discussion with the client about the type of work and if any documentation would be possible to get – would the client's customer or employers be willing to provide written statements? Does the client keep a calendar of their appointments or logs of their sales or work? Assist the client with determining an acceptable way to calculate and if possible verify the income.

In these types of special circumstances, when it is almost impossible to get verification or it would jeopardize employment, it would be acceptable to take clients statements, narrate clearly why verification is not able to be obtained and document your eligibility determination.

Q. If a worker is able to verify income with an employer but the client provides check stubs the next day because they were pended to do so, what do we do if the paystubs show different income than what we verified with the employer statement? Which should we use?

A. You would need to have a conversation with the client regarding the discrepancy. The paystubs would show what the client has actually received; if the statement from the employer is contradictory you will need to get clarification and narrate.

SNAP - Income

Q. What do you do when a client has a rent amount that is included in their gross pay because it is taxable and then taken out of pay? For Example: A client is working and their shelter is included in their monthly income. The client earns a monthly salary of \$1800 gross. Taxes and other deductions are removed leaving \$1400, and then their shelter is taken out which causes a reduction of \$500 for a total net pay of \$900 received.

A. Determine if the client has the ability to take this money as cash, which would make it available to them. This can be determined by having a conversation with the client, or talking to the employer. If there is no ability to access this money then exclude from the gross wages for the client. Narrate why you are including or excluding the money from the calculation. If it is excluded you would not allow a shelter deduction for this portion of the rent, but if it is determined to be countable then you would allow the shelter deduction.

Q. Do farmers and fishermen who have their income annualized need to have a 1099 even if income is earned in a few short months?

A. If a client is self-employed or contracted you would annualize their income. Not all contracted farmers or fisherman receive a 1099 so the 1099 is not a requirement.

Q. A client works at Ocean Spray periodically throughout the year. He reports his income, which has now gone above the limits and his case is closed because he is now over income. A couple of months later he reapplies and has no income. Can I annualize his earned income?

A. Only self-employed or contracted income can be annualized. This job would not be considered self-employment and it is not contracted. If your client is no longer working you would treat it as terminated income, give the 853 reporting requirements and place in SRS.

When they do report another job or new income, treat it like a new source and anticipate based on the verification.

Q. Can we accept client's statement that their earnings are excluded? For Example: A client reports she works as a Senior Companion and reports income of \$200/ mo. Client states this is an Older Americans Act funded income and is excluded. Can we request verification that their income is paid under the specific title funds like OAA Title V or VISTA etc...? Or can we accept client statement that the funds are from an excluded funding source?

A. Yes, you can accept the clients statement, IF you have a conversation with the client and it is determined that the income being received is Title II, III, IV, V or other excluded types of income. Narrate your conversation and their statements.

Q. Is the fee paid to a representative payee or a representative payee service deducted from the gross income or added as a medical deduction?

A. The fee is deducted from the gross income and is required to be narrated to show why we are using a net amount. Since a representative payee or representative payee service is not a medical cost, we cannot code it as a med deduction.

SNAP Policy Analysts

SNAP - Child Support

Q. When a person is ordered to pay Court Ordered Support (COS) and they are borrowing money from someone outside of the household to stay current on their child support obligation, do they get the COS deduction?

A. Yes, because it is court ordered and they are making the payment. In addition, the income from the loan is excluded.

Q. When COS is paid directly to landlord instead of the household - is it coded as SUP or OTH on the SNAP case?

A. Support payments that are countable should be coded as SUP. As long as the rent payment is court ordered (legally required) then it is counted as support even though it is being paid to a third party.

Q. Does direct child support have to be verified at 852?

A. All income must be verified; however, if the absent parent wrote a letter stating "I will pay \$XXX for the entire year" then that would be sufficient. If the prior verification received does not reflect the payments for the entire year, then new verification must be obtained.

SNAP Policy Analysts

SNAP - Shelter

Q. Should we be addressing in narration shared shelter situation (adult child lives in home SFG) even if clear on the application (who is paying rent)?

A. Absolutely! Though applications are now electronic; scanned, etc. it can happen that one would be misplaced/ misfiled. Narration will always clarify the situation for anyone looking at the case.

Q. What do we allow as a shelter deduction when client “pays what they can” and amount varies each month?

A. You can explain to the client that we need to come up with an amount in order to allow a deduction; they can base this on an average of what they have been paying and what they expect to pay in the future. It is okay to take the clients statement on what they have paid in the past.

Q. How does lodger rule apply to shared shelter situations?

A. There is a very distinct difference between lodger and shared shelter policy. A person will be either a lodger or they will not. They cannot be treated as both a lodger and a shared shelter situation.

A lodger is a person who resides in a home with other lodgers and pays for room & board (board being food); this income is looked at when the owner of the home/business is applying for benefits.

Shared shelter is when someone pays an amount of rent to reside in someone else’s home, purchases and prepares their own food and no meals are provided.

Q. We have a SNAP client who owns an apartment complex and manages the complex more than 20 hours a week. She lives in one unit and pays a total mortgage of \$325 per month. She has multiple units rented out. If her income is annualized, do I count the income as SEC? Also, would I subtract the rent she receives from her renters from her mortgage she pays and give her the rest as a shelter deduction? Or do I include the full mortgage and only count the rent as SEC?

A. If a financial group member actively manages the property 20 hours or more per week, this is treated as self-employment income; the income would be coded on the SNAP case as SEC if they have costs involved in managing the property. The mortgage on the entire building would be included as a business cost on the Schedule C or Schedule E of her taxes. Because the mortgage is being claimed as a cost of the business there is no shelter deduction allowed on the case.

Q. My client stays “here and there”- at one place they are charged \$200 for shelter and \$50 for utilities: do they get the utility deductions?

A. Yes, a client can receive the shelter deduction if they are charged for staying in a residence. Have a discussion about what the current situation is for their shelter and utility costs and narrate the discussion.

In addition, a person who is “couch surfing” and pays a small amount at each place can be allowed a shelter deduction for the average amount they pay during the month.

SNAP Policy Analysts

SNAP - 852

Q. Client (over 22 years of age) lives with parents (SFG) at intake and pays \$0 for rent and utilities. At 852, they have the same address but do not report the parents and states they pay rent in the amount which was previously listed on the application which the parents were paying; how should this be addressed? Do we call the client or do we not address and wait until recert?

A. If it is obvious that the client resides at the same address and they are not reporting any other changes you would just process the 852 with \$0 income and no shelter or utility cost. This guidance is ONLY for 852 and not for regular changes reported during the certification.

Q. At 852 we have been told we do not question student status, what happens when a client turns in student verification and a financial aid statement?

A. If the client is reporting any potential, countable educational income per the financial aid statement, you would need to address student criteria; i.e. scholarships, etc. If the financial aid statement shows all excluded income (i.e. Loans, Pell grants, Title IV, etc.) you would just note that the person has reported being a student and it will be followed up during recert with the client.

SNAP Policy Analysts

SNAP - Clarification

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Q. When checking income screens what needs to be narrated? One recent training indicated “IEVS checked”, One recent training indicated “all income screens checked”, One wanted every screen listed. Which way is it?

A. Central office is assessing the results of an audit that requires workers to narrate the use of income screens available to staff. Please see transmittal: [SS-AR-14-014](#) for guidance on specific wording related to income eligibility verification screens (IEVS).

Q. CAPI filing date - isn't this an electronic filing date? Former transmittal says to move filing date to next business day if falls on weekend, but the FSM does not reflect this information.

A. The filing date for an electronic application is the date that the department receives the signed electronic application or the next business day if the application is received after hours or on the weekend or a Holiday. There was a clarification sent in a transmittal (SS-IM-12-064) which explained this information. The FSM will be updated to reflect this on January 1, 2015.

Q. If a NED client in SRS reports they are working now but don't appear over the reportable income threshold (130% FPL), does this change their NED status since there is now earned income?

A. While in SRS, clients only need to report if their income is over the 130% so the case would remain NED until next recert.

Q. If a student opts out of a meal plan are they eligible for SNAP?

A. If a student is not enrolled in a meal plan they can be an eligible student as long as they meet one of the student criteria. However, if a student is required to purchase a meal plan, whether they choose to use it or not, they are not eligible for SNAP benefits.

SNAP Policy Analysts

TANF Questions and Answers

Q. TANF case closes prior to DQ- still eligible for TBA?

A. If a worker is in the process of DQ, and the customer requests their TANF case be closed, they are not eligible for TBA.

Q. When a customer applies for SNAP while the case is in ongoing TBA, and benefits would decrease, what notice and rule should be sent?

A. Deny the application using FSG1F01 and rule OAR 461-135-0506.

Q. Do we receive TANF job placement credit for non-citizens with TANF cases that report a job?

A. Participation can be counted if the placement is recorded correctly in Tracs (use the factory icon) and a WO step exists

Q. For JPI cases, do I need to add the UCMS case number to the SNAP cases for all individuals?

A. No, this is not a requirement of the program, however, could be a District requirement.

Q. When a customer is listed as a DPU childcare provider, would we use the billed hours or their income to arrive at the JPI countable income? They are not paid minimum wage.

A. To calculate the appropriate hours, use the income amount as this is considered self-employment income. Don't forget to include the copay!

Q. How do you calculate JPI average weekly hours when the customer is paid 2 times per month?

A. When looking at the paystubs, verify that the days within the pay period cover at least two full weeks of employment. If they are paid on set days of the month (i.e. 5th and 20th) divide by 2.15. If paid every other week (i.e. every other Fri), divide by 2 to get the weekly hours.

Q. Do I need to update the SNAP case from NA to PA for a JPI case?

A. The answer is NO. This is not a requirement of the program, however, could be a District requirement.

Q. Are APD disabled individual cases eligible for JPI? Do they count?

A. Yes, APD cases that meet eligibility for JPI count towards our participation as long as they are coded correctly.

TANF Policy Analysts

Q. In a 2 parent household, if they don't know their schedules, can you pend for verifying schedules?

A. Yes. You will need to have information about their schedules to determine if they have overlapping hours. If the hours don't overlap there is no ERDC eligibility.

Q. A client states that they want 40 child care hours per week. We call the employer who states that they could work 40 hours at some point but hasn't to date. Can we use 40 even though paystubs show 30 hours?

A. We should explain to the client that in order to approve 40 hours a week of child care, the 40 hours would be considered in their income calculation. If they have never worked 40 hours per week and the employer says it may be possible someday, it would not be beneficial to the client to authorize 40 hours per week. This is because the client hasn't worked 40 hours and it may never happen.

If the client starts working 40 hours a week in the future they can report that as a change.

If the employer said yes, they do work up to 40 hours at least once a month or more then we would approve 40 hours per week.

Q. Would the ERDC and SNAP income calculations be different?

A. ERDC and SNAP income calculations can be different. An example is when a client starts a new job and initial month income is lower than ongoing (see OAR 461-150-0060).

Q. ERDC case in SRS—Report an increase in hours—Do we still verify?

A. The process for reporting changes during the certification period remains the same. When a customer is in SRS and reports an increase in work hours, the child care work hours need to be increased for the next month based on the customer's statement. No other action is necessary unless it appears the increase may put the family's income above 130% FPL. In those situations:

- Send the DHS 853 with the income guideline for their filing group highlighted; or
- If it is apparent it will put them above 130%, send a 210A requesting verification. OAR 461-170-0011 Changes That Must be Reported.

Remember: If verification is received it must be acted on for all programs.

Q. How do we process applications received prior to 10/1 reservation list activation?

A. An application for ERDC is good for 45 days. If a customer applied for ERDC prior to 10/1 and the application is still within the 45 day period, then it can be used to determine eligibility without requiring the applicants to meet a reservation list exemption.

Example 1: Kristen applied for ERDC on September 28th establishing her DOR. The application is good for 45 days. She was pended for additional information which was received on October 25th. The date the pended items were received is within the 45 period. Determine ERDC eligibility without applying the reservation list criteria. If Kristen did not respond to the pend notice within the 45 days, she would need to reapply and would be added to the reservation list (unless she meets one of the exemptions).

Example 2: Mark turned in an ERDC application on September 26th. The application was reviewed and denied due to no child care need. On October 15, Mark is applying again stating he is now working and has a child care need. Because it has been less than 45 days, the application from September is still good and can be used to determine eligibility. Updated verification will be needed.

ERDC Policy Analysts

If you have any questions about Q&A transmittal, contact:

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