



**NEW YORK STATE
OFFICE OF TEMPORARY AND DISABILITY
ASSISTANCE
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Governor**

Informational Letter

Section 1

Transmittal:	12-INF-06
To:	Social Services District Commissioners
Issuing Division/Office:	Center for Employment and Economic Supports
Date:	June 4, 2012
Subject:	Food Stamp Program Clarification of Required Documentation/Verification
Suggested Distribution:	Food Stamp Directors, Temporary Assistance Directors, Staff Development Coordinators, Fraud Directors
Contact Person(s):	Food Stamp Bureau 518-473-1469
Attachments:	Attachment 1- TA/FS Documentation/Verification Desk Guide: LDSS-3666
Attachment Available On – Line:	TA/FS Documentation/Verification Desk Guide: LDSS-3666

Filing References

Previous ADMs/INFs	Releases Cancelled	Dept. Regs.	Soc. Serv. Law & Other Legal Ref.	Manual Ref.	Misc. Ref.
05-ADM-13 04-ADM-02 01-ADM-09 01-ADM-08 08-INF-08 06-INF-10		18 NYCRR 387.8, 387.9(b)	7 CFR 273.2(f), 273.12(c)	FSSB Section 5	10-LCM-11

Section 2

I. Purpose

This Informational letter (INF) is being released to clarify food stamp mandatory documentation/verification requirements at certification, recertification, and during the certification period. Per 18 NYCRR 387.8(b) “For households initially applying for food stamp benefits prior to certification, mandatory verification shall be completed regarding: gross nonexempt income, alien status, shelter expenses, medical expenses, residency, household size, social security number, identity, date of birth, utility expenses, resources, disability and, if questionable, household composition and citizenship and any other questionable information that has an effect on the household's eligibility and benefit level.” The TA/FS Documentation/Verification Desk Guide: LDSS-3666 has been revised to clarify food stamp policy and is attached to this INF as a reference tool. (Changes noted in IV.)

II. Background

This is to provide Social Services District (SSDs) with clarification regarding the food stamp mandatory verification requirements needed at certification and recertification. This clarification is intended to assist both households and eligibility staff in completing the verification process. Eliminating unnecessary verification and streamlining the verification requested will reduce the burden for both households and eligibility staff.

III. Program Implications

Verification is defined as the use of documentation or a contact with a third party to confirm the accuracy of statements or information. The SSD must verify certain information prior to certification for households initially applying for food stamp benefits. The applying household has primary responsibility to obtain the requested verification. However, if the household is unable to obtain the requested verification and is cooperating, the SSD has the responsibility to assist the household in obtaining the verification. The SSD should be reviewing past case record information (IEDR or the SSDs own imaging system) and not re-request verification that is already in the case file. **For the Food Stamp Program, any reasonable form of documentation must be accepted and the acceptable verification shall not be limited to any single type of document.** The attached LDSS-3666, TA/FS Documentation/Verification Desk Guide, lists different forms of Primary and Secondary verification, however, the Food Stamp Program does not differentiate between Primary and Secondary verification.

A. Sources of Verification:

1. **Documentary Evidence** – The SSD shall use documentary evidence as the primary source of verification for all items except residency and household size. Documentary evidence consists of a written confirmation of a household's circumstances. Examples of documentary evidence include wage stubs, rent receipts, and fuel/utility bills. Although documentary evidence shall be the primary source of verification, acceptable verification shall not be limited to any single type of document and may be obtained through the household or other source. Whenever documentary evidence cannot be obtained or is insufficient to make a firm determination of eligibility or benefit level, the eligibility worker may require collateral contacts or home visits. For example, documentary evidence may be considered insufficient

when the household presents pay stubs which do not represent an accurate picture of the household's income (such as out-dated pay stubs) or identification papers that appear to be falsified.

2. **Collateral Contacts** - A 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 over the telephone. Examples of acceptable collateral contacts may include employers, landlords, social service agencies, migrant service agencies, and neighbors of the household who can be expected to provide accurate third-party verification. When talking with collateral contacts, the SSD should disclose only the information that is absolutely necessary to get the information being sought. The SSD should avoid disclosing that the household has applied for food stamps, nor should they disclose any information supplied by the household.
3. **Home Visits** - Home visits may be used as verification only when documentary evidence is insufficient to make a firm determination of eligibility or benefit level, or cannot be obtained and the home visit is scheduled in advance with the household. Home visits are to be used on a case-by-case basis where the supplied documentation is insufficient.
4. **SOLQ** - SOLQ is an acronym for the State On-Line Query System. It is a real time application that allows authorized users to validate/verify Social Security Numbers, identity and obtain SSA Title II (RSDI) information, including Medicare Part A and B data, and Title XVI (SSI) data. SOLQ information is considered information that is Verified Upon Receipt (VUR). For more information on SOLQ see 10 - LCM – 11.
5. **Computer Matches** - The following computer matches are determined by OTDA to be Verified Upon Receipt (VUR) for FS purposes and require **no** further verification at the SSD level before they take FS action:
 - **SDX** - State Data Exchange verifies applicants/recipients in receipt of SSI;
 - **BENDEX** - Social Security Beneficiary Data Exchange verifies applicants/recipients in receipt of RSDI;
 - **PARIS** - Public Assistance Reporting Information System verifies recipients in receipt of benefits in another state/duplicate assistance;
 - **Prison** - NYS Department of Correctional Services and Division of Criminal Justice Services verifies recipients who are incarcerated in state, county or city jails;
 - **UIB** - NYS Department of Labor verifies recipients who are in receipt of Unemployment Insurance Benefits;
 - **VED** - Verified Employment Data is verified through either TALX/The Work Number or NDNH Manual Employment Verifications prior to posting; the information being verified originates from a match run against the National Directory of New Hires. This verifies TANF adult recipients who have been identified as completing a W-4 “Employee’s Withholding Allowance Certificate” and verified as receiving wages.

The matches **listed below** require further verification by the SSDs before any food stamp action may be taken. The following matches are **not** verified upon receipt:

- **WRS** - Wage Reporting System from NYS Tax and Finance;
- **SDNH** - State Directory of New Hires from NYS Tax and Finance.

Discrepancies - Where unverified information from a source other than the household contradicts statements made by the household, the household shall be afforded a reasonable opportunity to resolve the discrepancy prior to a determination of eligibility or benefits. The SSD may, if it chooses, verify the information directly and contact the household only if such direct verification efforts are unsuccessful.

Homeless Households - Homeless households claiming actual shelter expenses or those with extremely low shelter costs may provide verification of their shelter expenses to qualify for the homeless shelter deduction. If a homeless household has difficulty in obtaining traditional types of verification of shelter costs, the eligibility worker shall use prudent judgment in determining if the verification obtained is adequate. For example, if a homeless individual claims to have incurred shelter costs for several nights and the costs are comparable to costs typically incurred by homeless people for shelter, the eligibility worker may decide to accept this information as adequate information and not require further verification.

B. Mandatory Verification - The following information must be verified at application;

1. Gross non-exempt income (earned and unearned) – Gross non-exempt income must be verified for all households prior to certification. Examples of verification include paystubs or an award letter;
2. Social Security Number (SSN) – The household must provide the SSN for all applying household members. The SSD shall verify the social security number(s) (SSN) reported by the household by submitting them to the Social Security Administration (SSA) for verification according to procedures established by SSA. The SSD shall not delay the certification for or issuance of benefits to an otherwise eligible household solely to verify the SSN of a household member. If a household member does not have a SSN, they must apply for a SSN and cooperate with the process and provide the number no later than the next recert;
3. Alien status - The SSD must verify the eligible status of applicant aliens. If an alien does not wish the SSD to contact the United States Citizenship & Immigration Services (USCIS) to verify his or her immigration status, the SSD must give the household the option of participating without that member or withdrawing its application;
4. Residency (exemptions include homeless households, some migrant farm worker households, or households newly arrived in the district.) This does not need to be verified for each individual household member. For example, a utility bill may verify residence for the household;
5. Identity of the person making the application. Where an authorized representative applies on behalf of a household, the identity of both the authorized representative and the applicant must be verified. Examples of verification include a photo ID, driver's license or birth certificate;
6. Household size - verification can be obtained from a collateral contact such as a landlord statement or other readily available documentation. For example: driver's license, work ID, school district report, housing authority section 8, ID for health benefits or other assistance programs, wage stubs or any other documents which can be used to establish identity;
7. Able-Bodied Adult Without Dependents (ABAWD) work hours or hours of participation in work activities. The ABAWD must be participating in an average of

80 hours per month to remain eligible for FS for more than three months. (If ABAWD requirements are not waived by the SSD);

8. Resources – if not a categorically eligible household. Examples of verification of resources includes bank statements and stock certificates;
9. Age – the household must provide the date of birth for all applying household members. The household has until the next recertification to provide verification of the date of birth. Examples of verification of date of birth include birth certificates, marriage certificates and school records or the SSN validation (code 8) on WMS.

C. Mandatory Verification that is required only in order to receive the appropriate deduction and/ or exclusion in the food stamp calculation:

1. Shelter;
2. Unreimbursed medical expenses for households containing an aged/disabled member;
3. Unreimbursed child or dependent care expenses;
4. Disability;
5. Child support - Legal obligation and actual amount of child support paid.

D. Verification if Questionable - The following information shall only be verified if questionable. The applicant's attestation on the application is sufficient. No further verification is necessary, unless questionable.

1. Citizenship;
2. Household composition;
3. The individuals purchasing and preparing meals together or separately.

Information is questionable if the information on the application is inconsistent with statements made by the applicant, inconsistent with other information on the application or previous applications, or inconsistent with information received by the SSD through matches or other programs. For example: On the application the applicant states that he/she resides with their spouse and two others. At the interview the applicant states that he/she resides alone.

E. Verification for Expedited Processing - The SSD must use the following verification procedures for households qualified for expedited processing;

1. Identity - In all cases, the identity of the person making the application shall be verified through a collateral contact or readily available documentary evidence. SOLQ or the SSA validation of the SSN on the WMS clearance report (code 8) can be used as verification of identity. (For more information of verification of Identity see **05 ADM-13**);

Note: If no verification of identity is possible, then benefits cannot be issued.

2. Residency, Income, Resources, Other Mandatory Verification Factors - All reasonable efforts shall be made to verify within the expedited processing standards, the household's residency, income statement, liquid resources and all other mandatory factors required through collateral contacts or readily available documentary evidence;

3. Additional Verification – the SSD also may verify factors other than identity, residency and income provided that verification can be accomplished within expedited processing standards;
4. Social Security Number - Households qualified for expedited processing shall be asked to provide a SSN for each person or apply for one for each person before the first full month of participation.

Reminder: The SSD should attempt to obtain as much additional verification as possible during the interview, but should not delay the certification of households qualified for expedited service when the SSD has determined it is unlikely that the other verification can be obtained within the five day timeframe.

F. Verification at Recertification - The following verification is required at Recertification;

1. When there is a change in the earned or unearned income, if the income source has changed **or** if the income amount has changed by \$50.00 or more;
2. When there is a change in the unreimbursed medical expenses, if the source has changed **or** the amount has changed by \$25.00 or more;
3. When there is a change in the Child Support obligation or the amount;
4. Newly obtained SSN's;
5. SSN's and Date of Birth of new household members or for those where verification had been previously pended at certification;
6. ABAWD work hours or hours of participation in work activities, if ABAWD requirements are not waived by the SSD;
7. Other changes in household circumstances or information which is questionable or outdated. **It is SSD discretion to determine what is considered outdated.**

G. Verification of Changes During the Certification Period - The following information must be verified during the certification period:

1. Change reporting households must verify changes in earned income, if the earned income source has changed **or** if the earned income amount has changed by \$100.00 or more;
2. Change reporting households must verify changes in unearned income, if the unearned income source has changed **or** if the unearned income amount has changed by \$50.00 or more;
3. Changes that will increase the food stamp benefit;
4. For changes that will decrease the food stamp benefit, no verification is needed; the household does not have to report a decrease;
5. For simplified reporting households, information received that is not considered Verified Upon Receipt may, at the discretion of the SSD, either be verified without contacting the household or be postponed until the next recert or required contact point. Once the SSD has Verified Upon Receipt information, however, it must take action on the case, regardless of whether it results in an increase or a decrease.
6. Changes in ABAWD hours of work/participation in work activities if ABAWD requirements are not waived by the SSD.

Verified upon receipt is defined as information that is provided by a primary source that is timely and not questionable. (See 06-INF-10)

H. Verification for Periodic Reports:

1. Verification of income changes are required if the income source has changed or;
2. If the earned income amount has changed by \$100.00 per month or more or;
3. If the unearned income from a **private** source (private disability) has changed by \$100.00 per month or more or;
4. If the unearned income amount from a **public** source (SSA benefits, UIB) has changed by \$50.00 per month or more;
5. Changes in household composition;
6. Changes in address;
7. Changes in the amount of Child Support paid;
8. Increases in unreimbursed dependent care expenses or medical expenses.

I. Counterfeit/Altered Documents

SSDs are reminded that current desktop publishing software and other fraudulent means may be used by those attempting to commit fraud to alter documents or create fraudulent documents to gain/increase assistance received. SSDs are asked to be vigilant in their review of each piece of documentation provided and to refer to their Investigations Unit any case in which counterfeit or altered documentation is suspected. This is especially critical with the use of scanning and permanent repositories, since a counterfeit/altered document, once accepted into permanent storage, can continue to support the issuance of fraudulent benefits.

IV. Forms Information:

The LDSS-3666 TA/FS Documentation/Verification Desk Guide has been revised as follows:

- Identity - SOLQ added as a secondary acceptable form of verification for Identity;
- Residence - Utility bill added as a secondary form of verification for residence;
- Social Security Number (SSN) – SOLQ added as a source to verify SSN;
- Citizenship noted to verify only if questionable.

V. Forms Ordering Information

- The revised English version of the LDSS-3666: *“Documentation Verification Desk Aid”* is a Print on Demand form.
- The above referenced document has also been posted on the OTDA Intranet website at http://otda.state.nyenet/ldss_eforms/default.htm and is available for downloading by local districts for reproduction locally.
- Upon the release of this INF all previous versions of the *“Documentation Verification Desk Aid”* **must immediately be destroyed** and replaced with the revised 1/12 version.
- Any future written requests for master camera ready copies of the document, should be submitted on OTDA-876: *“Request for Forms or Publications”*, and should be sent to:

Office of Temporary and Disability Assistance
BMS Document Services and Operational Support
PO Box 1990
Albany, NY 12201

- Questions concerning ordering forms should be directed to BMS Document Services at 1-800-343-8859, ext. 4-9522.
- Document may also be ordered through Outlook. To order the form you must obtain an OTDA-876 electronically by going to the OTDA Intranet Website at <http://otda.state.nyenet/> then under Program Areas, go to Division of Operations and Program Support page, then to OPS E-forms page (this page contains the electronic OTDA-876).
- For those who do not have Outlook but who have Internet access for sending and receiving e-mail, the Internet e-mail address is: gg7359@dfa.state.ny.us .
- For a complete list of available forms, please refer to the OTDA Intranet site: http://otda.state.nyenet/ldss_eforms/default.htm .

Issued By

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