

FIELD OPERATIONS BUREAU

FOOD STAMP UNIT (FSU)

TRANSMITTAL NUMBER: 09-01

February 13, 2009

TO: All Food Assistance Action Committee (FAAC) Members
and Field Operations Bureau (FOB) Staff

SUBJECT/PURPOSE: Consideration of Deductions Not Received at Certification

RELATED REFERENCE: SNAP QC Policy Memo QC-09-01 (November 5, 2008)

SUPERSEDES: None

EFFECTIVE DATE: Upon Receipt

BACKGROUND:

A certification policy memorandum, dated December 18, 1998, allowed state agencies to add language to the food stamp application informing the household of their responsibility to report and verify all expenses in order to receive the deductions. SNAP has discovered that there has been confusion over the Quality Control application of this certification policy. The policy is being inappropriately handled by QC reviewers when completing their comparison budgets.

SNAP has clarified that an excluded deduction should not be used in the Comparison I calculation for cases where a deduction was not provided at certification or recertification because the client failed to verify the expense or failed to provide the information needed to receive the deduction when the information statement exists on the food stamp application.

For Comparison II calculations, the deductions would also be disallowed if the FSHH did not report or provide the verification at certification or recertification for failure to report and provide the appropriate verification to support the deduction.

As a result, SNAP has revised Section 621 of the FNS Handbook 310 with the following language: The first comparison is of an allotment computed based on the actual, verified budget month circumstances *for items entitled to be considered in the benefit calculation* to the authorized allotment. The reviewer must not determine whether there are any variances for the purposes of this comparison.

Section 621.1 of the FNS Handbook 310 was revised with the same language. Using actual, verified income and deductions for the budget month *for items entitled to be considered in the benefit calculation*, the reviewer must compute an allotment. This figure must include any relevant annualized or prorated amounts, and any applicable standard (i.e., SUA, homeless shelter standard, etc). As appropriate, income received on a weekly or bi-weekly basis must be converted to a monthly figure.

INSTRUCTIONS:

The following instructions will only be applicable for cases that were certified or recertified with the revised DFA 285.A1 application. This application does provide a deduction information statement informing the household that failure to report and verify the expense will result in the disallowance of the deduction. You will find the statement on the cover page of the application (see attachment). The State Policy Implementation Unit is in the process of adding a deduction information statement to the SAWS 1 application. Until this statement is added to the SAWS 1 application, this transmittal will not be applicable to cases that were certified or recertified with the current SAWS 1 application.

The QC reviewers must continue to verify actual sample's month's circumstances. When it is determined that the food stamp household (FSHH) did incur an expense but did not receive the deduction at certification or recertification, the reviewer must follow the procedures in Section 1113 of the FNS Handbook 310 in determining why the deduction was disallowed. If the FSHH failed to report the expense at certification or recertification after it was informed that failure to report the expense will result in the disallowance of the deduction for that expense, the reviewer will disallow the deduction in their comparison budget(s). The case record must clearly show the statement informing the FSHH of its right to claim the deduction and it must be dated for the time of the certification action covering the sample month. A copy of the cover page of the DFA 285.A1 is not required. However, you must document your findings in the Shelter comments.

QC reviewers cannot seek out information to offset other identified variances for the Comparison2 budget by using information that is related to a deduction that was not received at certification or recertification when the client failed to verify the expense or failed to provide the information needed to receive the deduction when the appropriate statements exist on the application.

For interim changes the above instructions are not applicable. The FSHH is required to report a change in their expenses when there is a change of address. If the household is under the quarterly reporting requirement, the change must be reported on their quarterly report statement (QR7). For change reporting households, the change must be reported ten days after the change of residence. If the change is not reported and the reviewer discovers a shelter expense, the reviewer would include the deduction in their COMP budget(s).

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