

Verification Requirements and State Options

The following chart clarifies what verification requirements are mandatory at initial certification and describes the program flexibility within those requirements that may help reduce workload. The chart also lists the State options that may apply to each item of eligibility that could have workload impact.

Most of the items listed are mandatory according to program rules under 7 CFR 273.2(f)(1). Note that once a State agency determines an item is questionable, then it becomes mandatory to verify it. Program rules provide that the State agency must verify all other factors of eligibility determined to be questionable. The State agency can opt to verify anything it chooses that affects eligibility and the household's benefit amount. Verification may be required statewide or throughout a project area, but shall not be imposed on a selective, case-by-case basis on particular households. In some cases opting not to verify may increase the payment accuracy risk. The only exception is if the State has disclaimer that a deduction will not be allowed if not verified. Each State should weigh the savings in not verifying a non-mandatory item and the potential for increased payment error against the savings in implementing reduced verification.

Item of Eligibility	Mandatory	Optional	Program Flexibility	State Options
ABAWDS – additional verification - 273.2(f)(1)(xiv)	Yes, hours worked if subject to the time limit and countable months in another State.		Statewide waivers, including being eligible for extended unemployment benefits and LSA	The American Recovery and Reinvestment Act (ARRA) eliminated the time limit for able-bodied adults without dependents (ABAWDs) during the period from April 1, 2009 through September 30, 2010, unless a State chooses to offer a qualifying work activity.
Alien eligibility – 273.2(f)(1)(ii)	Yes			
Child or dependent care expenses – 273.9(d)(4)	No	Yes		See state option under shelter costs.

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Child support - 273.2(f)(1)(xii)	Yes, must verify legal obligation, the amount of obligation, and the monthly amount actually paid.			See state option under shelter costs. Also, option to treat legally obligated child support payments as income exclusion instead of a deduction.
Disability – 273.2(f)(1)(viii)	Yes, if applicable		For some types of disability, observation by the worker suffices.	
Household composition - 273.2(f)(1)(x)		Yes, if questionable		
Identity – 7 CFR 273.2(f)(1)(vii)	Yes, of the person making application.	Yes, for other household members.	No specific type of document can be required, such as a picture id.	
Income (gross, non-exempt) – 273.2(f)(1)(i)	Yes		If verification of income unsuccessful after exhausting all attempts, the eligibility worker can determine an amount to be used for certification purposes based on the best available information.	States may exclude certain types of income not counted under TANF or Medicaid. This option does not apply to wages, salaries, benefits from major public assistance programs, regular government payments, worker’s comp, and child support payments
Medical expenses – 273.2(f)(1)(iv)	Yes. No need to re-verify if unchanged or change is \$35 or less.		If verification causes delay in certification, eligibility can be determined without deduction.	See state option under shelter costs.
Residency – 273.2(f)(1)(vi)	Yes, with some exceptions.		Exceptions include homeless households, some migrant farmworker households, or households newly arrived in project area.	

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Resources – 273.2(f)(3)		Yes, if questionable	Categorically eligible households do not have to meet the resource limits under 273.8(b).	
Shelter costs (excluding utility expenses) – 273.2(f)(3)	No, but information is needed to calculate the excess shelter deduction.		If verification causes delay in certification, eligibility can be determined without deduction. EW may be able to verify shelter costs in conjunction with residency (i.e. rental or mortgage agreement).	Simplified determination of deductions - state agencies can disregard reported changes in certain deductions until the next recertification, except changes with a new residence or earned income. Applies to shelter costs (including utilities), child or dependent care, child support payments, and medical expenses.
Social Security numbers – 273.2(f)(1)(v)	Yes		Proof of application for Social Security number will suffice if no enumeration exists.	
Students – 273.2(f)(1)(xi)	Yes, if physical or mental unfitness is not evident.			
Utility expenses – 273.2(f)(1)(iii)	No, unless: a. Household is claiming expenses in excess of the State agency's utility standard and the expense would actually result in a deduction; or b. Household claims utility expenses for an unoccupied home.		The standard utility allowance shall be used if the household is entitled to claim it and has not verified higher actual costs. Eligibility can be determined without deduction if expense not verified.	See state option under shelter costs. In addition, the simplified SUA eliminates the requirement to prorate the SUA among those that share living space; also allows the SUA for certain households on public housing with shared meters charged excess utility costs.