

Department of Social and Health Services  
Olympia, Washington

**EAZ Manual**

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Category Basic Food Overpayment  
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**Summary**

Updated clarifying information under WAC 388-418-0005 to ensure that the examples match the prompts and are easily understood by staff. Also made minor cosmetic changes (e.g., correcting numbers and spacing) to the whole reporting requirements page.

Updated February 1, 2024  
See below for edited text:

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## Reporting Requirements

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### Purpose:

WAC 388-418-0005 How will I know what changes to report?

- Clarifying Information and Worker Responsibilities

## WAC 388-418-0007 When do I have to report changes in my circumstances?

- Clarifying Information and Worker Responsibilities
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### Clarifying Information - WAC 388-418-0005

#### 1. SSI / SSI-related medical benefits:

- Reporting requirements for **SSI-related** medical benefits *don't apply* to a person receiving SSI medical (So1). SSI recipients report changes to the Social Security Administration.
- A recipient of So1 medical and benefits from another program must report changes based on the requirements for the other program.

**EXAMPLE:** A family receives So1 medical, TANF, and Basic Food benefits. So1 medical does not follow the same reporting requirements as SSI-related medical (i.e., So2). The family must report changes based on the cash reporting requirements.

#### 2. Reporting Requirements for Basic Food Simplified Reporting:

- a. Basic Food households must report when their income goes over 130 percent of the income poverty levels based on the number of eligible household members in their assistance unit. A household meets reporting requirements under simplified reporting when the household reports their income is above 130 percent of the income poverty level, but they remain eligible for Basic Food. The household doesn't have to report any other income changes until one of the following occurs:
    - The mid-certification review (MCR);
    - The eligibility review (ER); or
    - The household income is greater than 200 percent of the income poverty limit.
  - b. Basic Food households must report when a member has a substantial lottery or gambling win. This information is not subject to simplified reporting rules. Households must report this change by the 10th of the following month after receiving the winnings.
- #### 3. Reporting Requirements for State Supplemental Payment Program (SSP):
- SSP recipients don't have to report changes.  
We decide if someone is eligible for SSP based on information Social Security Administration (SSA) gives us through the State Data Exchange (SDX).

#### 4. Taking action on changes:

When we receive information about someone's circumstances, we must determine the impact on the person's benefits. This includes determining how the source of information impacts the actions we take on the household's benefits and whether we are required to act on it. Depending on the reporting circumstances, we may have to contact the household, contact other parties, or ask for proof of the household's circumstances under [WAC 388-490-0005](#).

#### Client Reports:

- Take action based on changes the person reports. This includes when someone volunteers information after we contact them.
- Get proof of a household's circumstances if they report:
  - A decrease in income that increases their benefits;
  - A change in expenses that increases benefits; or
  - For **Basic Food**, a change in expenses that increases food benefits **and** the expenses are questionable given their income and other circumstances.

#### Third-Party Reports:

- Information reported by anyone other than the household is a third-party report.
- We must verify information reported by a third-party that conflicts with the information reported at application or recertification if the information is a reportable change.

**EXAMPLE:** ~~Jamie receives Basic Food benefits. At application Jamie reported only child support income which ~~is~~was verified by the department. One month after her application, the noncustodial parent Gabriel reports that Jamie is working full time at the Sky Valley Medical Clinic making \$30 per hour. This income would put the household over the reporting requirement of 130% of the FPL. The worker is unable to contact the employer and sends a request letter to Jamie. Annie receives Basic Food benefits and supplied an address in Tacoma on her application. One month after her application, Tim calls and reports no person named Annie has ever lived at his address, the address Annie provided during her application. The information Tim supplied conflicts with the information Annie used at her certification. The worker is unable to contact Annie or the landlord. The worker sends a request letter to Annie's last known address.~~

- When information reported by a third-party doesn't conflict with information provided at certification, we must determine if the household is required to report the change based on their benefit program.

- Hold the information until the next Mid-Certification Review or Eligibility Review, whichever comes first, if it's information the household is not required to report.

**EXAMPLE:** ~~Omar~~Annie receives Basic Food benefits. ~~His~~ neighbor ~~Manuel~~Suzanne calls and reports ~~Omar~~Annie moved to Virginia. The worker correctly determines ~~Omar~~Annie doesn't need to report this information. The worker holds the information until ~~Omar~~Annie's upcoming Mid-Certification Review.

**EXAMPLE:** ~~Rio~~Same scenario as above but Annie receives TANF and Basic Food benefits. ~~Her~~ neighbor, Kennedy, ~~name~~calls and reports Rio moved to ~~Alto~~Nevada. ~~Although~~ she ~~is~~ ~~not~~isn't required to report this change for Basic Food, she is required to report it for TANF. The worker sends a request for information letter to ~~Rio~~Annie's last known address.

**For Basic Food only cases:**

<b>If the household</b>	<b>And the information</b>	<b>And the change happened</b>	<b>Then</b>
<b>Is required to report the change</b> <ul style="list-style-type: none"> <li>• Total monthly income exceeds the gross income standard;</li> <li>• Substantial lottery or gambling win; or</li> <li>• Work hours fall below 20 hrs/wk for person who must meet work requirements</li> </ul>	<b>Is verified upon receipt</b> (information comes from the source: for example, SOLQ, UTAB, current employer or landlord) or a <i>system match</i> from the Social Security Admin (such as SDX), or National Directory of New Hires	Less than 60 days before the current month	Act on the change.
	<b>Is not</b> verified upon receipt or a system match		Ask the household to verify the information and take appropriate action.
	<b>Is a system match</b> (SSA, NDNH)	60 days or older	Act on the change.
	<b>Is not</b> from one of those sources		Hold the information until the next MCR or recertification.
<b>Is not</b> required to report the change	<b>Is</b> verified upon receipt	Less than 60 days before	Act on the change.
	<b>Is not</b> verified upon receipt	(no timeframe) →	Hold the information until the next MCR or recertification.

If the third-party report shows that we certified or recertified the case using significantly conflicting information, we must verify the report and make the necessary case corrections. This may involve creating overpayments or making a fraud referral.

~~**EXAMPLE:** Annie receives basic food benefits and supplied an address in Tacoma on her application. One month after her application, Tim calls and reports no person named Annie has ever lived at his address, the address Annie provided during her application. The information Tim supplied conflicts with the information Annie used at her certification. The worker is unable to contact Annie or the landlord. The worker sends a request letter to Annie's last known address.~~

~~**EXAMPLE:** Jacob reported at cert that his rent is \$750. It is not questionable, as he has enough earned income. Later, Marco applies, listing the same address. We find out Marco has lived there and, while the full rent is \$750, he and Jacob have shared the rent equally for several months, prior to Jacob's application. If Marco's information is correct, Jacob has an over issuance. We contact Jacob to clarify the issue and, if necessary, create the overpayment starting with certification. Jesus receives basic food and was certified with no income at application. A month and a half after application CSD receives a NDNH tickle showing current income in Oregon. The income was not wasn't addressed at certification and is therefore conflicting information which must be address even if Jesus did not didn't go over the 130% of the FPL reporting requirement. The worker cannot verify the income in cross-matches and sends Jesus a request of information letter.~~

Example of information that conflicts with, but does not *significantly* conflict with, information used at cert:

**EXAMPLE:** Julie reports at cert that she is working 25-30 hours a week, and we verify this with the bookkeeper, using an average of 27.5 hours a week. We later find out Julie has been working closer to 30 hours for several weeks, before her application. Julie is required to report when her hours go under 20 hours a week. Even though her hours were estimated incorrectly, this is not a significant conflict with the information used. She still meets the work requirement, and the hours she is working are still within the estimate provided by the bookkeeper.

Examples of information changing after cert:

~~**EXAMPLE:** Annie receives basic food benefits. Her neighbor Suzanne calls and reports Annie moved to Virginia. The worker correctly determines Annie doesn't need to report this information. The worker holds the information until Annie's upcoming Mid-Certification Review.~~

**EXAMPLE:** Philip receives basic food. We receive a tickler from Employment Security Department in March that Philip was hired at Quick Stop Fuel and Food in December. Although we aren't certain if Philip would have to report this chance, we do know the information is over 60 days old. The worker holds this information in the case record to address at the next MCR or ER.

### c. Changes Verified Upon Receipt:

- Information reported from the primary source is "verified upon receipt". This information doesn't require secondary verification. Some examples include:
  - SOLQ;
  - UTAB;

- A current employer; or
- A landlord.
- Some verified upon receipt sources update ACES automatically and generate alerts for the change. We don't need to take action on these alerts.

**d. A Lottery or Gambling Win:**

- Information provided by the Washington State Lottery data match is verified upon receipt. Staff must take appropriate action to close the case if the client has winnings equal to or over the elderly or disabled resource limit for Basic Food. See [Lottery or Gambling Disqualification for Basic Food](#).

**e. Other Reports:**

- Tickles or alerts from sources not verified upon receipt are considered third-party reports. Determine how to treat these tickles or alerts based on how we treat third-party reports.

**f. Department of Corrections Reports and Incarceration:** We have to act on Department of Corrections match tickles. These matches are from a primary sources, however, because the tickles are based on data we receive once a month, we must verify the tickles data.

Use FORS to determine whether the client is still incarcerated. Remove the incarcerated client from the basic food or cash household with adequate notice if they are incarcerated more than 30 days.

When the department verifies a client is incarcerated over 30 days, we suspend EBT benefits to prevent fraudulent use. Take the following steps when receiving notification that someone is verified to be incarcerated over 30 days:

- Submit a "Suspension of EBT benefits due to Incarceration" request
- Document the actions taken and reason for suspension of the EBT account
- Include canned text in the termination letter informing of the reason for termination and how to reactivate benefits

When a client contacts the department to report they are no longer incarcerated, request reactivation of benefits and document case action. Benefits will be available within 48 hours of notification they are no longer incarcerated. Contact to the department is also considered a request for reinstatement or application.

**g. SSA Death Alerts**

We must take action on alerts from SSA of a client's death. This information is not considered verified upon receipt. Use DOH web portal to verify a client's death.

**h. Information known to the department:**

Information considered known to the department doesn't need verification to affect a household's benefits. The "department" is any agency under the Department of Social and Health Services including:

- Division of Child Support (DCS);
- Aging and Long Term Support Administration (AL TSA);
- Behavioral Health Administration (BHA);
- Developmental Disabilities Administration (DDA); and
- Facilities, Finance & Analytics Administration.

It also includes programs within ESA.

**EXAMPLE:** A CSD worker is notified by an HCS worker that a Basic Food client has been placed in an Adult Family Home. With all their meals provided, Basic Food needs to close. As this information came from HCS, part of AL TSA, the CSD worker treats this as verified and closes the client's benefits. The move was not required to be reported, so no Basic Food overpayment exists.

**EXAMPLE:** A worker receives a tickler from Health Care Authority (HCA) worker that a household receiving TANF and Medicaid moved out of state. Because HCA is not a part of the department, the worker treats this information as a third-party report.

5. **ABAWD reporting requirement:**

A household must report when a non-exempt ABAWD's hours of employment drop below 20 hours per week. This includes when the non-exempt ABAWD is the head of household for Basic Food. Only ABAWDs in King County (except those living on the Muckleshoot Reservation) are subject to this requirement.

## Worker Responsibilities - [WAC 388-418-0005](#)

The **DMS E001** tickler uses EBT transaction data to identify EBT cash or food clients who may no longer be living in Washington because they are consistently using their benefits out of state. Out of state EBT transactions are defined as any EBT purchase, ATM withdrawal or manual voucher transaction at a non-Washington site that requires the use of an EBT card as part of the transaction. When this occurs, the residency may be questionable.

Follow the E001 tickler handling process described in the CSD Procedures Handbook.

## Clarifying Information - [WAC 388-418-0007](#)

1. **When a change happens:**

**Non-Income Changes**

The date of a change is normally the date a change happens. Examples of this include the date:

- Someone gets married;
- A newborn comes home from the hospital; and

- Someone moves to a new home.

**Income Changes** The date of an income related change is the date someone **receives income** based on the change. Examples of this include the date:

- On the first paycheck that reflects a wage increase; and
- On the person's first paycheck for a new job.

**EXAMPLE:** Sandy receives cash assistance and is hired for a new job on May 31st. She starts work on June 10th. Her first paycheck is July 5th. Because this is a change in income, we count the date of Sandy's first paycheck on July 5th as the date of the change. She must tell us about this change by August 10th. If Sandy reports this change earlier, we act on the change based on when we expect her to receive the income.

**EXAMPLE:** Nick is hired for a new job on May 1st. He receives his first paycheck on June 1st. Nick must report this change of employment status and income by July 10th.

**EXAMPLE:** Stacey receives TANF and Basic Food. Her employee evaluation was on October 1st. Based on this evaluation, Stacey gets a promotion and a \$1.25 hourly wage increase. The wage increase takes effect October 15th. She will receive the first check showing this increase on November 10th. Because this is a change in income, we count the date of Stacey's first paycheck on November 10th as the date of the change. Stacey must report this change to us by December 10th. - If Stacey reports this change earlier, we act on the change based on when we expect her to receive the income.

## 2. Changes a client voluntarily reports:

- We must act on changes reported by the household even if they didn't have to report it under [WAC 388-418-0005](#). This includes asking for more information or proof of a change when we can't tell the impact on their benefits.
- For Basic Food, under simplified reporting rules, clients do not have to report when they move until recertification or until the mid-certification review, whichever comes first. If they voluntarily report a move between mandatory reports or for another program, they must provide their new shelter costs. The new shelter costs do not need to be verified unless questionable. See "Worker Responsibilities" (4.) and (5.) below.

**EXAMPLE** Larry receives Basic Food only. He calls and reports his monthly rent expense went from \$300 to \$500 monthly. The worker ~~chooses to verify~~ [requests verification of](#) this change ~~as "questionable"~~ [as "questionable"](#) because the [total shelter costs](#) (\$500 plus utilities) are so close to Larry's monthly income. The worker updates the shelter costs after they receive proof of the expense.

**EXAMPLE** Ian receives TANF and Basic Food. He leaves a message with his worker reporting that he started a job and would like to close his TANF benefits today. Ian's worker closes TANF benefits based on the request. Since Ian reported he is now employed, his worker must follow up to see how this impacts his Basic Food benefits.

3. **Unverified changes that increase benefits:**

We ask for proof of a change if it increases a household's benefits. We only ask for proof of an increase in expenses if the expenses are questionable. We increase the AU's benefits based on the effective date rules under [WAC 388-418-0020](#).

- We don't update a household's case to increase benefits if they fail to give us requested verification of a reduction in income or an increase in expenses.
- We don't close the case based on the household's failure to give proof of a change that would increase their benefits.

4. **Changes someone reports on an application or eligibility review:**

People may report a change in their circumstances on an eligibility review form or an application for benefits. If you receive an application or eligibility review form:

- a. **Before** the ER notice is mailed to the client in the second to last month of their certification period, treat this form as a change of circumstances.
- b. **On or after** the ER notice is mailed to the client in the second to last month of their certification period, treat this form as a request for review or recertification. See [ELIGIBILITY REVIEWS AND RECERTIFICATIONS](#) for procedures.
- c. **In the month before the mid-certification review is due**, use the information on the application / review form to complete the MCR for any related programs.
- d. **For medical**, you may use an application or review at any time to update the medical certification period.
- e. **For handling additional applications** received before initial application is processed see "Clarifying Information" #4 under [WAC 388-406-0010](#) .

**EXAMPLE** Susan's Basic Food certification period ends on July 31st. She turns in an Eligibility Review form for Basic Food only on May 31st. Because Susan turned in the ER before the 15th of the month before the month her certification period ends, we treat the form as a change of circumstance report.

1. **Temporary absence of an AU member:** If an AU member is temporarily out of the home:

- For cash and medical assistance, follow the rules in [WAC 388-454-0015](#) to determine if the person is still eligible for benefits.
- For Basic Food, follow the rules in [WAC 388-408-0035](#) to determine if the person is still eligible for benefits.

2. **AU member moves out of Washington:**

Washington state residency is a requirement for most programs. If an AU member or the entire AU leaves the state, follow the rules in [WAC 388-468-0005](#) to determine if they are still eligible for benefits.

## WORKER RESPONSIBILITIES - WAC 388-418-0007

1. **During the application, recertification or eligibility interview:**
  - a. Tell clients what changes they must report and how much time they have to report the changes; and
  - b. Explain how to report changes either in writing, online, by phone, or in person. (See [RIGHTS AND RESPONSIBILITIES](#)).
2. **When people report a change or when you learn of a change:**
  - a. Ask for more information or proof if needed. See [LETTERS](#) for the rules and the process on asking someone to take an action or give us information.
  - b. Take action on the information using the effective date rules in [WAC 388-418-0020](#).
  - c. If we averaged their income under [WAC 388-450-0215](#), recalculate this source of income if you expect this change to last at least a month beyond when you learn of the change.
  - d. Document:
    - i. The details of the change;
    - ii. The date we learned about the change or the date the change was reported;
    - iii. The impact on benefits; and
    - iv. The effective date for any change in benefits.
  - e. Send written notice about the change based on requirements in [LETTERS](#) even if the benefits do not change.
3. **For Basic Food, if the household doesn't report a change in medical expenses, but you learn about a change:**
  - a. Do not contact the AU about the change;
  - b. Act on the change **only** if you can get proof of the change from someone other than the AU; and
  - c. Set an alert to get proof of the change at the next recertification. Update the Expense Page in ACES once you get proof of the medical expenses.
  - d. Document in the ACES narrative whether or not we should use the medical expense at the next recertification.

**NOTE:** If you later approve medical assistance that covers a person's medical expenses, delete the medical expenses on the Expense Page and recalculate the person's Basic Food benefits.

4. **For Basic Food, when the client voluntarily reports a move in person or on the phone:**

- a. Ask for the new out-of-pocket share of shelter costs associated with the new residence.
- b. Don't require verification of the new shelter expenses unless questionable.
- c. Make it clear that they don't need to wait for the first regular rental or utility payment to tell us the amount(s).
- d. Update and document the new shelter costs in ACES.
- e. Send notice to the client if there is a change in the benefit amount. Give advance notice if there is a decrease.

5. **If the client reports a move in writing or we receive returned mail with a new forwarding address on the envelope:**

- a. Attempt to contact the household by phone. If successful, follow instructions in (4.) above.
- b. If unable to contact by phone and it's the month of an ER or MCR, don't send the household a general correspondence letter.
  - i. Update the address;
  - ii. Re-send the return form(s) to the new address; and
  - iii. Wait to update shelter information until the ER or MCR.
- c. If unable to contact by phone and **not** in the month of an ER or MCR, send the household a general correspondence letter asking for the new shelter costs associated with the move.
  - i. Make it clear in the letter they don't need to wait for the first regular rental or utility payment to tell us the amount(s); and
  - ii. Don't require verification of the new shelter expenses unless questionable.
- d. If the household responds to the letter:
  - i. Update and document the new shelter costs in ACES; and
  - ii. Send notice to the household if there is a change in the benefit amount. Give advance notice if there is a decrease in benefits.
- e. If the household doesn't respond to the letter, take no action. Verify new shelter expenses at the next review.

**NOTE:** Do not use a "Request for Information" letter as this letter requires a Basic Food AU closure if the client does not respond.

## Mid-Certification Reviews

For information on mid-certification reviews, please see the [Mid-Certification Reviews](#) section.