

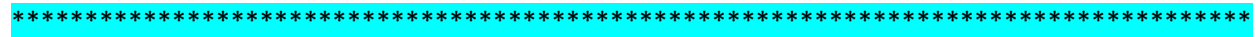
Department of Social and Health Services
Olympia, Washington
EAZ Manual

Revision #1296
Category Verification
Issued 9/5/2024
Revision Author: Alex Schuler
Division CSD
Mail Stop 45440
Phone 425-555-1212
Email alexander.schuler@dshs.wa.gov

Summary

Adding #4 under Clarifying Information for WAC 388-490-0005 including the requirement to verify income at application and eligibility review before denying or terminating.

Updated September 5, 2024
See below for edited text:



Verification

Created on:
Jan 29 2019
Revised ~~May 28, 2021~~ Sept 5, 2024

Purpose:

This chapter describes what information must be verified, other factors that may be verified if necessary, and criteria for evaluating documents that are received.

[WAC 388-490-0005](#) The department requires proof before authorizing benefits for cash and Basic Food.

- [Clarifying Information and Worker Responsibilities](#)

Verification Charts (Acceptable Forms, Cash and Basic Food and Medical)

Clarifying Information - WAC 388-490-0005

1. Address Confidentiality Program:

See [CONFIDENTIALITY](#) for instructions on verification if the client is a participant in the Address Confidentiality Program (ACP).

2. Verification of Income Deductions for Basic Food:

We only require verification of a household's income deductions for Basic Food when the information is questionable. This includes verification at initial application, recertification, or Mid Certification Review (MCR). A client's statement is acceptable for income deductions unless there is something to suggest that the claimed expense is incorrect.

We must still make use of readily available information such as child support paid by the household through SEMS or Child Care Subsidy Programs copayments through WCAP.

NOTE:

Although we don't have to verify income deductions that are within reason, we **must** still verify their monthly income.

3. Living Above Means (LAM)

a. What is LAM?

i. A positive LAM determination suggests that a household has some way of paying for their living expenses through nonstandard or unexplained ways. A household is considered LAM when the AU's **countable income for Basic Food** (BF) is less than the allowable rent/mortgage costs. These amounts can be found on the FSFI/eligibility screen in ACES/3G.

ii. For purposes of LAM, countable income follows WAC 388-450-0162 **except** that we **do not subtract the shelter** (rent/mortgage/utility) **deductions** under WAC 388-450-0185 (5) because the LAM countable income will be compared to the rent/mortgage. Utility deductions (such as SUA) aren't considered in any part of the LAM calculations.

b. What should we do when a household is LAM?

- i. **Application/Eligibility Review (ER):** When a BF and/or TANF households are LAM, we must determine how the household is paying for expenses and meeting its needs.
 - A. Set the indicator(s) for BF and/or TANF in ACES/3G to “Yes” to show that the household is LAM.
 - B. Even when the household explains/verifies how it meets needs, leave the indicator as Yes so the information can be reviewed at the next ER.
- ii. **Mid-Certification Review (MCR):** MCR processing does not require us to confirm/re-verify LAM.
- iii. **Active Cases/Changes:** Active cases shouldn’t be pended (such as setting a tickler to check a case later) for LAM or verification of LAM if there is no ER due. If an active household reports a change which causes their situation to become LAM, we don’t need to verify meeting needs specifically. Note – there still may be a reason to verify changes or other questionable circumstances.

c. **When does LAM require explanation or verification?**

- i. If the household situation changed **less than a month ago** and put the household within the LAM definition, then the household shouldn’t be required to explain how it will pay for needs. If the household has been meeting their needs without sufficient income/resources for at least a month, then the household should be asked to explain LAM.
- ii. We should only require verification if the explanation isn’t clear, isn’t reasonable or suggests there is other income that may be countable.
 - A. **If the client fails to turn in requested verification, and there is not enough information to determine eligibility, deny the AU for failure to provide verification.**
 - B. If the client turns in verification that appears sufficient for eligibility determination but still seems questionable, the eligibility worker may decide to make a fraud (FRED) referral.
- iii. If the household says they aren’t able to pay for their needs and the bills are piling up then document this statement and follow-up at each review. If questionable, get verification from landlord, utility companies, etc. that client is in arrears.

d. **What if the case is not LAM?**

Per WAC 388-490-0005 (2) (c) and (8) (a), anything that is questionable and may affect benefits needs to be explained and/or verified, even if the household isn’t LAM. Be sure to mark the indicator(s) in ACES/3G as “No” for LAM.

EXAMPLE:

Client Jenifer verifies gross earned income of \$850 monthly and claims rent of \$800 and pays electric heat. After the earned income deduction of \$170 and standard deduction of \$152, the countable income is \$528. Since the countable income of \$528 is less than the rent of \$800, the client is LAM. You question how Jenifer has been able to pay rent, and she states that her mom

has been paying \$300 towards Jenifer's rent for a few months. You need to verify the rent being paid by the mom, to find out how to correctly classify it, such as direct payment to landlord, loan, gift and how long her mom's help will continue.

EXAMPLE:

Client Bill verifies gross earned income of \$850 monthly and claims rent of \$500 and pays electric heat. After the earned income deduction of \$170 and standard deduction of \$152, the countable income is \$528. Since the countable income of \$528 is more than the rent of \$500, the client isn't LAM. Reminder: the utility deduction isn't considered in the LAM determination.

EXAMPLE:

Client Patricia verifies gross earned income of \$850 monthly and claims rent of \$500 and pays electric heat. Jenifer also pays \$65 per month for child care. After the earned income deduction of \$170, the standard deduction of \$152 and the \$65 deduction for child care, the countable income is \$463. Since the countable income of \$463 is less than the rent of \$500, the client is LAM. You question how the client has been able to pay rent and other expenses. Jenifer states that she has been dwindling down her checking account which still consists of \$2600 of an Earned Income Tax Credit from her Federal Tax Refund received 2 months ago. You notice in the Spider wage match that Jenifer worked more last year than she is now, so the bank account (resource) doesn't need to be verified.

EXAMPLE:

Client Bob has MCR due for BF. He turns in the form by mail and indicates there are no changes in income or expenses (since his application 5 months ago). The case was already marked as LAM during the last application process. Bob's AU data shows gross earned income of \$850 monthly and claims rent of \$800 and pays electric heat. After the earned income deduction of \$170 and standard deduction of \$152, the countable income is \$528. Since the countable income of \$528 is less than the rent of \$800, the client is LAM; however, you don't need to delay processing of an MCR for explanation of LAM.

EXAMPLE:

Client Holly sends a letter of termination from her employer stating that her last pay was one week ago. There is no ER due, so this change will follow the change of circumstances rules. Since the stop work was verified, the income should be removed. Though the client may now be considered LAM, no explanation or verification regarding the new LAM determination should be requested.

EXAMPLE:

No verification provided/Still questionable/Unable to determine eligibility:

Client Jason has an ER due for BF. He turns in the ER form by mail with pay stubs showing average gross earned income of \$850 monthly. He says his rent is \$800 and pays electric heat. After the earned income deduction of \$170 and standard deduction of \$152, the countable income is \$528. Since the countable income of \$528 is less than the rent of \$800, the client is still LAM so during the interview you ask him how he is paying his expenses. Jason cannot explain

how he's able to pay his rent on time so you give him 10 days to provide proof of how he meets his expenses every month. Ten days go by and Jason fails to provide the needed proof. Since Jason failed to provide a reasonable explanation and lacks proof as to how he can pay his bills you should deny his Basic Food recertification request.

EXAMPLE:

When to make Fraud Referral:

During the ER interview with LAM client Jason you notice in the case file that he's provided several conflicting stories during the past three contacts with the department. He told one worker four months ago he had to quit work to care for his sick mother. During another interview he was caring for his sick brother. He tells you he was living with his mother up until she died last year and he had no siblings that could help him. It's very obvious to you Jason is not being truthful with you and you suspect he's committing fraud and has another source of income he's not reporting. Jason's case should be referred to OFA for further investigation so you submit a FRED referral.

4. Requirement to Verify Income at Application and Eligibility Review:

For Basic Food, the department must verify income before approving or denying benefits at application or eligibility review. Client statement of income isn't sufficient to deny or terminate. When processing an application or eligibility review always request verification of income if unable to collect it through collateral contact or crossmatches. If verification is received, review to determine eligibility. If verification isn't received, deny for lack of verification, instead of for excess income.

Note: This requirement doesn't apply to change of circumstances. During the certification period, when a client reports income that will decrease or terminate benefits, process the change and provide the household with a 10-day notice of adverse action. The client has 10 days to provide verification and undo the reduction or termination. Always take immediate action on income that decreases or terminates a case.

45.7 Verification at recertification for Basic Food:

For Basic Food, only certain factors must be verified at recertification. In addition, there are some factors we cannot require clients to verify at recertification.

We must verify:	Don't require verification of:
<ul style="list-style-type: none"> • A change of income if the source has changed or the amount has changed by more than \$50; • Questionable expenses; • ABAWD: Continued Participation; 	<ul style="list-style-type: none"> • Income if the source hasn't changed and the amount has changed \$50 or less; • Income deductions that aren't questionable; or • Income-in-Kind

We must verify:	Don't require verification of:
<ul style="list-style-type: none"> Any information that is incomplete, inaccurate, or outdated. 	

NOTE:
We must **always** verify information needed to determine eligibility if it appears incomplete, inaccurate, or outdated. This is true even if the client reports the eligibility factor as unchanged at recertification.

EXAMPLE:
Client is in the CSO on March 14th for recertification. They report rent has changed from \$475 to \$500 monthly. You determine that this is reasonable considering the household's income and prior rent and do not request verification.

EXAMPLE:
Client applies for assistance on December 15th and states that she just began a new job on December 10th. Her employer states that he anticipates that she will be working 20 hours per week and will make \$9.00 per hour. She is certified for December through February.
In February, you should request verification of both her current hours of work and her pay rate since anticipated income for new hires often changes after the employer has a chance to evaluate their work performance.

6.5. Verification of citizenship and identity for Medicaid programs:

Due to implementation of the Affordable Care Act (ACA), medical WAC's and clarifying information can now be found in the [Apple Health \(Medicaid\) Manual](#).

The following programs are required to verify citizenship and identity and will be sent through the SSA interface, if they don't meet one of the exemptions:

- Cash programs: TANF (F01) and Aged, Blind or Disabled (G02).

NOTE:
Clients of public assistance may be eligible to receive a WA state "Identocard" at the cost of production ([RCW 46.20.117](#)) from the Department of Licensing. To assist clients with applying for a reduced priced ID card, please complete DSHS Form 16-029.

ACES Procedures:

See Citizenship and Identity Coding

7.6. Verification of citizenship or alien status for Basic Food, ABD and state funded medical programs.

For these programs, we only require verification of citizenship or alien status if:

- The client declares they are not a citizen, or
- The client declares they are a citizen but there is a valid reason to question their status.

EXAMPLE:

A client of Hispanic descent declares that he is a U.S. citizen. We accept his statement at face value.

EXAMPLE:

A client declares that he is a U.S. citizen but produces a Social Security card that states “Valid for work only with BCIS/INS authorization”. We ask for verification of his citizenship.

EXAMPLE:

A client from Somalia declares that he is a non-citizen. We ask for verification of his specific immigration status.

8.7. Verification requirements for department programs:

The linked charts display the eligibility factors that must be verified at initial application for each program and the factors that have different verification requirements at recertification. Accept a client's declaration of age, identity, citizenship, and SSN. Ask for verification to be provided whenever the information is questionable.

Most eligibility factors **cannot** be automatically re-verified after initial certification. They can only be re-verified if:

- a. A program the client receives benefits from specifically requires the factor to be re-verified; or
- b. There is a change in that specific factor or the information is incomplete, inaccurate, inconsistent, or outdated.

For more information, see:

- [Verification Charts](#)

9.8. Department forms for verifying information:

There are some DSHS forms that may also be used to obtain verification. These forms verify several eligibility factors and may be more convenient for the client to use rather than obtaining several sources of verification. **Do not require** the client to use these forms.

- [DSHS 14-224\(X\)](#) Statement from Landlord/Manager
- [DSHS 14-223\(X\)](#) Statement from School

10.9. DFI home visits to reservations:

DFI has an agreement with several tribes that investigators will contact the tribe before making any unannounced home visits on the reservation.

Worker Responsibilities - WAC 388-490-0005

1. At initial application, obtain mandatory verification of each eligibility factor for the program(s) the client has requested. For cash you may also want to verify the client's resources if the estimated value of countable resources is equal to or greater than 3/4 of the resource limit. For example, the TANF resource limit for applicants is \$12,000. You may want to request verification of the resources if the client states the value of the countable resources totals \$9,000 or more to make sure that the client's resources are below the limit.
2. At eligibility review or recertification, look in the case record before asking the client to provide the verification. If the client has previously provided verification of an eligibility factor, don't require the client to provide the verification again unless the program requires the factor to be re-verified, there is a change in that specific factor, or the information is incomplete, inaccurate, or inconsistent or outdated.

NOTE:

Ensure that the Electronic Case Record (ECR) has a readable copy of the proof of identity required for each program.

3. When you need verification, use alternative methods, such as telephone calls, as the primary method to verify client circumstances. Request paper verification only when there are no other methods readily available
4. When requesting paper verification, ask for documents that the client can easily get. If it will take the client more than three business days to get the verification, offer to help the client get it.

EXAMPLE:

Lost immigration documents can be replaced through a Freedom of Information Act (FOIA) request to the BCIS/INS but this may take months. You may need to rely on a "collateral statement" in the meantime.

5. The client may only have documents that are old or expired. Do not assume that the information in an old or expired document isn't valid but seek more current verification. This is

particularly important in the case of immigration documents, since immigration status doesn't necessarily expire when the document expires.

6. If you know or have reason to suspect that the client is a victim of domestic violence or if you have reason to suspect that the client is a victim of domestic violence:

- a. Have the client write a statement that explains what proof or way of getting proof would put the client or the children at risk of harm, if any.
- b. Help the client get proof that will not put them at risk.
- c. For a victim of domestic violence who is also an immigrant, consider referring her to an immigration attorney or to the Northwest Immigrant Rights Project. A "collateral statement" from an immigration attorney may be sufficient to document status in such cases.
- d. Many women who are victims of domestic violence change back to their maiden names after dissolution of their marriage. For a victim of domestic violence who is also an immigrant, BCIS/INS will not issue new documents to reflect this change. To verify status, make a copy of both the immigrant document and the dissolution decree describing the name change.

EXAMPLE

A woman and her two children apply for assistance. They are living at the local domestic violence shelter and the father of the children lives in the family home. **Do not call** the family home to verify any information. Do not require the victim to return to the home to get any verification.

7. If the client has a disability that would make it difficult or impossible to get certain information, offer to get the information for the client.
8. See Equal Access - NSA for additional procedures if the client has been designated as needing Necessary Supplemental Accommodation ([NSA](#)).
9. If the verification will cost money (such as birth, death, or marriage certificates, medical information, copies of bank statements, etc.) authorize advance payment.

For vital statistics records:

- a. For out of State citizenship verification from Vital Statistics or identity verification from Department of Licensing will be requested through the Citizenship Central Unit if the client does federally verify with SSA interface. See Citizenship and Identity verification for Medicaid in clarifying information of this section.
- b. For other purposes, complete the appropriate state's form to request the Vital Statistic Record. You can download the form, find out the current charge for the record, and find the correct address for the payment at <https://www.vitalchek.com>.

NOTE:

When using this site, don't use the on-line purchasing option to obtain the record.

- c. Complete an A19-1A, *State of Washington Invoice Voucher*, for the request.
 - i. Use the appropriate state name for the vendor name.
 - ii. For the address, use your CSO name, mail stop, and zip code 10000.
 - iii. For Vendor Number, use **VOD1**.
 - iv. For Invoice Number, use **VITALS**.
- d. Send vital statistics A-19's as a separate batch. To avoid several small batches, local offices may want to hold the requests until there are several that need to be processed. Due to the time constraints for receiving vital statistics records, input the batch of A-19's at least once a week.
- e. When the A-19 batch is sent, send an email to Rridula Rohila (rohilm@dshs.wa.gov) or Christina Milam (Milamc@dshs.wa.gov) at the office of Accounting Services.
- f. When the checks are returned to your office, send the check and the state's form to the appropriate state's address.
- g. Maintain a log with the following information:
 - i. Date the A-19 was input;
 - ii. Date the checks were received from OAS;
 - iii. The warrant number and date;
 - iv. Date the request was sent to the our-of-state agency; and
 - v. Date the Vital Statistics Record was received.

10. When requiring additional verification from the client, document on the remarks screen in ACES why additional verification was needed. Some reasons to request additional verification are:

- a. The information you have received is questionable. Consider the information questionable when it:
 - i. Contradicts or conflicts with other statements made by the client;
 - ii. Is received from a third-party source that contradicts or conflicts with other statements made by the client; or
 - iii. Causes you to question the accuracy of the information provided by the client.
- b. The client doesn't know information that could affect eligibility. (For example, the client knows that they pay the electric bill and the gas is included in the rent, but they do not know if the heat is electric or gas); or
- c. You need precise information in order to determine eligibility, e.g., a client's resources are close to the resource limit.

11. Criteria for evaluating verification:

- a. Use the following criteria to evaluate documents and verbal/written statements used for verification:
 - i. Does it verify the eligibility factor? (For example, a child's birth certificate verifies age, citizenship, and parentage. It doesn't establish that the child is living with the client.)
 - ii. Is the document/statement the most reliable available evidence?
 - iii. Was the document/statement prepared near the time the event took place?
 - iv. Is the document/statement signed and dated?
 - v. Has the time period the document/statement covers expired?
 - vi. Who prepared the document/statement? Is that person reliable? Does that person have a personal interest in the outcome?
 - vii. Is there a phone number to contact the person who prepared the document/statements?
 - viii. For what purpose was the document/statement prepared?
 - ix. Does the document/statement deny knowledge of a fact although the statement maker was clearly in a position to know the facts?
 - x. Was there a legal process involved in establishing the document/statement? Was an oath administered? Was an affidavit taken? Were witnesses present?
 - xi. Are there any inconsistencies in the document/statement itself?
 - xii. Is the document/statement consistent with other information?
 - xiii. Is the document/statement based upon first-hand knowledge rather than opinion, inference, or hearsay?
 - xiv. Has the document been in the possession of a person with reason to change it? Does it appear the document is altered? For instance, is a different typeset or handwriting style used on only a portion of the document? Has anything been erased or covered with correction fluid (White-Out®)?
 - xv. Is there any other reason to question the validity of the document?
- b. After evaluating a document on the above criteria, determine if you have enough information to establish eligibility. If not, document the reason and request further verification.
- c. When there are conflicts in documents or verbal/written statements:
 - i. Obtain in writing a clarifying statement from the client or other person that reasonably explains or resolves the conflict.

ii. Obtain verification items, or refer the case to FRED to obtain verification items needed to support the explanation or resolution of the conflict. See [FRAUD](#) for details on FRED referrals.

iii. When verification items cannot be obtained to support the explanation or resolution, make a decision based on available information. If the available information isn't sufficient to determine eligibility, deny or terminate assistance. Document the action taken.

12. What to document for each case:

- a. What verification you requested;
- b. Why you requested verification/additional verification;
- c. What verification you received;
- d. When you received the verification;
- e. Who prepared the verification document/statement;
- f. What action you took, if any, to help the client get the verification;
- g. Whether the client has a disability that would make it hard or impossible to get the verification, and/or whether the client is a victim of domestic violence and failed to get the verification due to the domestic violence;
- h. Whether the client has been designated as Equal Access- NSA, and if so, whether you followed the Equal Access Plan;
- i. What decision or action you took; and
- j. Any other information you consider pertinent to the situation.