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P-2122B

P-2122 Sources of Verification for Eligibility Determination (Continued)

B. Sources of Verification by Eligibility Factor

The following are guidelines to help you verify eligibility factors. Document verification in the case record by writing down the date, source, and any other relevant information or attach copies of documents. If possible, make photocopies of permanent documents such as birth certificates, Social Security Cards, etc.

1. Age and Identity

The birth certificate is the primary verification. If the client does not have a birth certificate available, birth record data is usually available from any of these sources:

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|---------------------------------|--------------------------------------|
| 1. Birth certificate/record | 10. Marriage license |
| 2. Baptismal certificate/record | 11. Driver's license |
| 3. Confirmation papers | 12. Liquor Control Board
Age Card |
| 4. Military service papers | 13. School records |
| 5. Immigration papers | 14. Physician's records |
| 6. Naturalization papers | 15. Draft card |
| 7. Hospital birth certificate | 16. Military service record |
| 8. Adoption record | 17. Alien registration card |
| 9. Passport | |

2. Living with Specified Relative (verified for Reach Up if doubtful)

Two elements are considered: (1) the degree of relationship, and (2) living with the specified relative. The primary verification for relationship is the birth certificate. For school age children, the basic verification to establish "living with the specified relative" are school records showing address of the child and the relative responsible for the child. For pre-school children, use verification from other sources based on the individual situations.

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|---------------------------------|--|
| 1. Birth certificate/record | 7. Reliable collateral |
| 2. Adoption papers | contact (public housing, authority, minister
neighbor, physician, etc.) |
| 3. Baptismal certificate/record | |
| 4. Marriage certificate | |
| 5. Court order record | |
| 6. Contact with school system | |

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B. Source of Verification by Eligibility Factor (Continued)

3. Real Estate

Verify property ownership with documents provided by the applicant/recipient or with town or county records.

Any of the following documents may provide verification:

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|--------------------|-----------------------------|
| 1. Deed | 5. Articles of agreement |
| 2. Sales agreement | 6. Real estate tax receipts |
| 3. Mortgage | 7. School tax receipts |
| 4. Estate data | 8. Income tax return |

4. Life Insurance

There are two basic types of life insurance policies which clients may own, term life insurance and whole life insurance. All other kinds of life insurance policies (Universal life, variable life, etc) are variations of whole life.

Term insurance pays a benefit (face value) only if the insured person dies. Term insurance has a face value but has no cash value.

Whole life insurance generates a cash value from an accumulation of dividends and interest, in addition to the death benefit (face value). The policy owner may take a loan against the cash value of the policy.

Whole life policies usually contain a table of estimated cash values. These tables should be used only to estimate the potential cash value of the policy because they become inaccurate over time.

To determine the actual cash value of a policy, contact the insurance company using form 216L (Life Insurance Information Release) and (Life Insurance Cover Letter) 216LL.

When a client denies ownership of insurance, and this is questionable, a check can be made through local insurance agencies or brokers to establish the non-ownership of insurance. Evaluate which insurance companies might be a potential carrier for the client, (i.e., use the present and former insurance policies for auto, home, personal property and policies held by other family members, to furnish leads as to what brokers and companies to contact).

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B. Source of Verification by Eligibility Factor (Continued)

5. Savings, Cash, Investments, etc.

When the client has declared ownership of these resources, he will generally have documents in his possession to establish ownership and value of the asset. If the client does not have these documents, this information can be obtained from the custodian of the funds or the investment organization. (See P-2122 D for list of banks.)

When the client denies ownership of these assets, and this is questionable based on some other circumstantial evidence, the subject should be explored. Evaluate the client's past circumstances and present living standards to determine the possibility of these assets. For example, did the client recently move from his own home to an apartment? What happened to the home? Was it sold and did the client put the profit into a savings account? Is it now rented? Did the client give the house away to become eligible?

If the client is in a long-term care facility: you may want to have the client (or the person authorized to handle the client's affairs) sign a DSW 201B "Information Release Authorization" to facilitate obtaining required verification. Note, in the "Other" section of the "Case Record Contents" form, (1) that the form has been signed and (2) the date.

If DSW 208s, Verification of Bank Accounts, are sent to banks, include a postage-paid envelope for the banks to use.

Ask the client where he/she cashes his/her check, what banks or institutions were used for past transactions, or what source of financing was used for major purchases. Through a thorough and well-directed interview, leads can be obtained for verification sources to establish ownership or non-ownership of these resources.

6. Automobile Ownership

The "blue book" (N.A.D.A.) of car valuations can be used to establish the value of motor vehicles. Another source is car dealers who can give an approximate valuation based on make, model, year and condition of the vehicle.

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B. Sources of Verification by Eligibility Factor (Continued)

7. Disposal of Property

This element of eligibility considers the type of property (real or personal), the valuation of property, consideration received for the transfer of property, and time period of the transfer. Eligibility factors in regard to provisions covering property disposal vary between programs.

In those situations, in which the client acknowledges that property was transferred, the client and the transferee will generally have some type of documentation to provide the necessary verification.

Courthouse records can be cleared to check on the transfer of real property. The docket books are listed by both grantor and grantee in the index so that real property transfers can be checked using either party's name.

When the client advises that he has not transferred property within the time limits of the State regulations, evaluate the client's circumstances, past and present, to determine if transfer might have occurred.

1. Property transfer tax return papers
2. Deed
3. Mortgage
4. Purchase and sales agreement for subject property
5. Court records
6. Attorney's records
7. Real estate agency or broker
8. Motor vehicle registration

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B. Sources of Verification by Eligibility Factor

8. Earnings

The primary verification for declared earnings is the employee's pay record of wages received from his employer (pay stubs, etc.). When the client has declared earnings but does not have verification available, this information can be obtained in writing, electronically, or by telephone directly from the employer.

If obtaining over the phone for 3SquaresVT and Healthcare, enter a note in CATN that collateral verification was obtained.

For Reach Up, collateral phone contact should only be used as a last resort if every attempt has been made to obtain written verification. If this is the case, document pay information on an Employment Verification Form (218 or 218E). Enter a CATN that states that a collateral contact was used, refers to the employment form in OnBase, and documents why the written verification was not able to be obtained.

Investigate the receipt of tips for service related employment.

If the applicant does not list employment on the application the interview should include a discussion of past employment to give an indication whether the recipient/applicant might be returning to work in the future or be eligible to collect UC benefits.

- | | |
|--|---|
| 1. Pay stubs | 6. Income tax forms |
| 2. Pay envelope | (state and/or federal) |
| 3. Statement from
client's employer | 7. Sales and expenditure
records |
| 4. Client's self-employment
bookkeeping records | 8. Department of Employment
and Training |
| 5. Employee's W-2 form | |

NOTE: All four paystubs may not be required. If, for example, you have the first and fourth paystubs with the YTD (year-to-date) earnings, use them to determine the missing earnings.

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B. Sources of Verification by Eligibility Factor (Continued)

9. Pensions and other benefits

1. SSI/AABD or social security award letter
2. BENDEX
3. Social security (Form SSA-1610 U-2 or SSA-491-TC TPQY Input)
4. Social security district office files
5. SDX (State Data Exchange System)
6. Railroad retirement award letter
7. Benefit payment check
8. Correspondence on benefits
9. Department of Employment and Training (Unemployment Compensation Division)
10. Unemployment compensation award letter
11. Pension award notice
12. Worker's compensation records
13. Income tax record (state and federal)
14. Union records
15. Insurance company records.
16. Department of Veterans Affairs award notice
17. Department of Veterans Affairs [DSW 214 (Veteran's Benefit Information Request)]

NOTE: The Department of Veterans Affairs will verify the benefit amount without a signed release. If the VA requires a signed release, use the 214.

Mail inquiries for other information to VA Medical Center, 215 North Main St, White River Jct., VT 05009-0001 or call 1-800-827-1000

10. Support Payments and Contributions

The Office of Child Support Services is responsible for contacts with the absent parents of ANFC recipients to establish payment directly to the Department. An ANFC applicant/recipient must assign their rights to support and agree to turn over any support payments received.

The ES is responsible for verifying child support payments to the client for NPA cases. (See P-2260 for further procedures)

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B. Sources of Verification by Eligibility Factor (Continued)

11. Other Income

This section covers all income not enumerated under its own individual income element. The principal items are income in kind, income derived from rental or lease of property or from property rights, money from friends on a regular basis, free shelter, and income from other sources.

The type of verification necessary depends on the type of income available to the client. The client's situation should be evaluated to ascertain the possibility of an additional source of income.

When the client discloses income of this type, she/he will generally have documents or papers to identify the source and amount. A contract or other document between the person making payments to the client to verify the purpose and the amount of money paid should be required.

Through a process of elimination, the possession or non-possession for most of these items can be established. For example, verification of client's shelter costs eliminated the possibility of free shelter, determination that the client does not own property eliminates rental income, lease rights, or income from property rights.

1. Rental agreement or lease
2. Receipts for service provided (income in kind)
3. Rent receipts of tenant, roomer or boarder
4. Statement of person providing income in kind, goods, or financial aid
5. Receipts, agreements, leases of person paying monies to client under this element.

12. Basic Budgetary Allowances (ANFS or GA) or Expense Deductions (FS or SF)

A basis for including each "need" item in the budget must be established. In addition, if actual cost is a factor, the cost of the item must be verified.

- | | |
|---|---|
| 1. Rent receipts or lease | 7. Room and board receipts |
| 2. Tax statements | 8. Contract with landlord |
| 3. Utility bills or water/sewage bills | 9. Real estate agent |
| 4. Home Owners Ins Policy | 10. Municipal taxing authority |
| 5. Mortgage payment receipts | 11. Records of Public Housing Authority |
| 6. Sales agreement or purchase contract | |

NOTE: A completed DSW 202H (Shelter Expense Statement) is also acceptable verification.

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B. Sources of Verification by Eligibility Factor (Continued)

13. Other--School Attendance

The primary verification for school attendance is certification from the proper school authority that the child is attending school and fulfilling the State requirements for school attendance.

14. Citizenship

A U.S. birth certificate in combination with verification of identity will usually establish citizenship. On foreign born individuals' other sources or combinations will be required.

1. U.S. passport
2. Naturalization certificate
3. U.S. Citizen Identity Card
4. Certificate of Citizenship
5. Consular report of birth
6. 202F (Citizenship/Legal Alien Statement) See also #16, "Alien Status".

15. Social Security Numbers

See individual program policy and procedures regarding who is required to have a Social Security number and the timeframes for applying for a number.

Temporary ID Number

Assign a temporary "666" ID number to each person who does not have a SSN (see P-2160). A client may receive benefits with a temporary ID number provided timeframes for applying for a SSN are met. See individual program policy and procedures.

To apply for a SSN:

The parent of a newborn can request a number for the child when the birth registration form is completed in the hospital.

All others complete a SS-5 (Application for a Social Security Number). These forms are available in Social Security offices as well as ESD offices. Explain to the client that the SS-5 explains how to apply (in person or by mail) and what evidence is required. SSA will not accept the application without the required evidence. Explain to the client that failure to provide evidence to SSA will delay the SSN application and may cause a delay or reduction in Department benefits.

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B. Sources of Verification by Eligibility Factor

15. Social Security Numbers (Continued)

Verification of Application for a SSN:

The client must provide verification of application for a SSN. Verification can be any of the following forms:

- o Form 215A (Social Security Number Referral): This form is given to the client who applies for ESD benefits prior to applying for a SSN. The form is given to the client by you to be signed by a Social Security Office worker upon completion of the SSN application and submittal of required evidence. The client is responsible for returning it to ESD. A temporary ID number must be entered on the form.
- o SSA 5028 (Receipt of Application for Social Security Number): This form is completed by the Social Security Office worker at the client's request for verification of application. This is primarily used when the client applies for ESD benefits after applying for a SSN.
- o SSA 2853 (Message from Social Security - Information about when you will receive your baby's Social Security Card): This form is completed by a hospital official at the time the parent requests to apply for a SSN for the newborn. Hospitals report that over 90% of the parents request to apply.

Verification of a SSN

The client is not required to provide physical verification of a SSN. Because the SSN is used as the primary identification number for both IV-A and IV-D and is needed for computer tape matches (e.g. Bendex, SDX, IRS, DOL), it is to the Department's benefit to identify the client by SSN as soon as possible.

NOTE: It is usually ten business days between application for and receipt of a SSN.

ESD and the Social Security Administration exchange computer tapes to match real numbers with temporary "666" ID numbers. This only happens when the client applies for a SSN and submits a Form 215A at the same time. This is called "enumeration".

For those who verified SSN application with the SSA 5028 or SSA 2853, ask the client to notify ESD when the SSN is received. If the client does not notify ESD, check with the client at each review. Change the "666" number to the SSN upon notification.

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B. Sources of Verification by Eligibility Factor

15. Social Security Numbers (Continued)

Numident: Once a SSN is entered into ACCESS, the numident tape exchange with Social Security will verify whether the number belongs to the person.

Discrepancies: Require verification of a SSN if a tape match discrepancy cannot be resolved with information available in ACCESS or in the case record. Potential causes of discrepancies include: name changes where SSA has not been notified; incorrect birth dates; incorrect spelling due to hyphenation; use of modifiers such as Jr, Sr, II, etc.

Send a verification letter asking for a copy of the individual's social security card.

- If the card matches what is on file, overwrite the 'D' in the numident field with a 'V'. Recurrent discrepancies after verification should be resolved with SSA collateral contact.
- If the card does not match what is on file, overwrite the 'D' with an 'S'. Direct recipient to report any changes to SSA that are causing the discrepancy.

If recipient fails to comply with verification, remove the individual from the eligibility household. If a Medicaid deemed newborn, pursue verification after the deemed eligibility period expires.

Examples

Application for SSN made before contacting ESD

1. Jane gives birth to her son John in Rutland Hospital. She applies for a SSN for him in the hospital and receives an SSA 2853 from the hospital social worker. Jane brings the SSA 2853 to you and asks to have John included on her Reach Up grant. Since we have verification that he's already applied for a SSN, do not require that this be done again. Since he has not received his SSN, assign him a "666" number. Ask Jane to notify you when she receives John's SSN.

NOTE: If she did not receive an SSA 2853 in the hospital, tell her to call the hospital medical records section to request a SSA 2853. This is preferable to sending the client to the Social Security Office since they may ask her to reapply for a SSN which may result in the issuance of two SSNs.

2. Paul goes to the Social Security Office to apply for a SSN for his daughter Polly. A few weeks later he comes to ESD to apply for Reach Up. Since he has already applied for a SSN, do not require him to reapply. Since Polly has not received her SSN yet, you assign her a "666" ID number. Ask Paul to contact the Social Security Office for verification of SSN application. Upon checking their computer to verify that the SSN application has been received, SSA gives Paul a SSA 5028. He sends it to you. Ask Paul to notify you when he receives Polly's SSN.

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B. Sources of Verification by Eligibility Factor

15. Social Security Numbers (Continued)

Application for SSN made before contacting ESD

Sally reports that her 8-year-old son is now living with her and that she would like 3SquaresVT and Medicaid for him. He does not have a SSN. Instruct her that an application for a number is required. Assign a "666" number to the child and fill out the top of the 215A. The Social Security office completes the bottom of the 215A when they receive the complete SS-5 with required evidence. Sally returns the 215A to you as proof of application. Submitting the 215A to the Social Security Office at the time of application for a SSN also ensures that the enumeration tape match will update ACCESS with the SSN.

16. Alien Status Applicants

At the time of initial application all adults applying for ANFC, Medicaid or Food Stamps are required to declare in writing on the DSW 202F (Citizenship/Legal Alien Statement) whether they are a U.S. citizen or a legal alien, with the following exceptions:

- a) The head of household, or other adult, in Food Stamp only and Food Stamp/Fuel households may sign the DSW 202F for all household members.
- b) Applicants applying on the DSW/VDH 010B (WIC/Medicaid/Dr. Dynasaur Program Application) are only required to indicate their citizenship with a yes/no answer on the DSW/VDH 010B. If they are not U.S. citizens, complete legal alien verification is required.

NOTE: Children and pregnant women who meet all Dr. Dynasaur eligibility criteria except citizenship (i.e., illegal aliens) are eligible for Dr. Dynasaur as a "pure" Dr. Dynasaur.

NOTE: Individuals applying on a DSW 201 (Application) and DSW 202 (Statement of Need) for benefits for a child(ren), but not for themselves, are required to sign the DSW 202F to attest to the citizenship of the child(ren).

Recipients

Non-Food Stamp households need not sign a new DSW 202F at recertifications or reapplications providing the original DSW 202F is in the case file. Any new adult member being added to the assistance unit must attest to his or her citizenship/alien status by completing a DSW 202F.

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B. Source of Verification by Eligibility Factor

16. Alien Status (Continued)

An adult member of a Food stamp recipient household must sign a new DSW 202F at each recertification. Adults who join a food stamp household do not need to verify citizenship/alien status until the next recertification, at which time the head of household, or other adult, may sign the DSW 202F for all household members.

Processing Non-Citizens

Notify legal aliens that changes in alien/citizenship status must be reported.

If a member of the assistance unit fails to fill out and sign the DSW 202F, count his/her entire resources and a prorated share of his/her income when computing the amount of assistance for the remaining household members. The Family Services Division (FSD) is responsible for obtaining information regarding the status of aliens. You must obtain the required information and submit it to the Family Services Clerical Unit according to the following procedures:

- Aliens must present original documentation of their alien registration or another form of documentation determined reasonable evidence of the alien's immigration status. Accept only original cards, forms and documents for verification purposes.
- Aliens without documentation, i.e. those claiming documents are lost or stolen, etc. should be referred to the local INS Office to request replacement prior to verification procedures.

MAILING Immigration & Naturalization Services
ADDRESS: P.O. Box 328
 St. Albans, Vermont 05478
 Tel: (802) 951-6506

LOCATED AT: 50 South Main Street, Federal Building
 St. Albans, VT 05478

- Most aliens will present documentation containing his/her registration number. Referred to as the "A" number, it references the individual's alien file at the Immigration & Naturalization Service. The "A" number consists of seven or eight digits preceded by the letter "A". Each alien has his/her own number.

NOTE: Some INS documentation does not include a photo of the individual. In these instances, ask to see a document which includes a photo, such as a driver's license.

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16. Alien Status (Continued)

Send an ACCESS "MAIL" message to "INS" requesting verification, giving the full name, the "A" number, and the programs the applicant is applying for. The "MAIL" message is to be followed by xeroxing both sides of the source document being used and send it to the Family Services Division (FSD).

If the alien does not have a "A" number, xerox any evidence he/she is presenting and submit it to the Family Services Division (FSD) in lieu of the "A" number.

Based on the "MAIL" message, FSD will verify the "A" number against the Immigration & Naturalization Service designated system, SAVE (Systematic Alien Verification for Entitlements). If there are discrepancies between the documentation provided by the individual and INS records, or if secondary verification is required based on the initial inquiry, ESD will be responsible requesting it. If additional hard copy documentation is needed for secondary verification, ESD will request it from the district.

In no case, however, should benefits be delayed, denied or reduced solely on the basis of immigration status before the results of the secondary verification have been received.

17. Death date

Before entering a death date in an individual's member panel, the death date should be verified for all programs except Supplemental Fuel. The Social Security Administration updates death date information on a daily basis. Death dates can be retrieved by updating SVES using the deceased individual's SSN. Other acceptable sources of verification include:

- death certification
- hospital records
- newspaper obituary
- Social Security, Railroad Retirement, Veterans Administration or similar award
- funeral home
- CFC 804A Discharge Notice from Nursing Home or Hospital
- Power of attorney or family member
- CFC 804 Home Based and ERC Change Report.