



CDSS

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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES



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GOVERNOR

October 28, 2011

ALL COUNTY INFORMATION NOTICE I-45-11

TO: ALL COUNTY WELFARE DIRECTORS
ALL CALFRESH PROGRAM COORDINATORS

SUBJECT: VERIFICATION REQUIREMENTS IN CALFRESH

REFERENCES: MANUAL OF POLICIES AND PROCEDURES SECTIONS 63-201.4, 63-300.32, 63-300.5, 63-300.5(a)(2), 63-300.5(e)(1), 63-300.5(e)(3), 63-300.5(e)(5), 63-300.5(e)(5)(A), 63-300.5(e)(6), 63-300.5(e)(7), 63-300.5(e)(8), 63-300.5 (e) (9), 63-300.5(e)(10), 63-300.5(e)(11), 63-300.5(f)(2), 63-300.5(g), 63-300.5 (g) (1), 63-300.5 (g) (2), 63-300.5 (j), 63-404, 63-404.13, 63-405.7, 63-405.11-17, 63-406.111(a), 63-406.2, 63-406.216(a) - (e), 63-410.21, 63-504.325(a), 63-505.311, 63-505.511-.518, 63-508.32, 63-508.616(b)(2), 63-508.62; WELFARE AND INSTITUTIONS CODES 10000 AND 15000; ALL COUNTY LETTER 09-01, 00-19; ALL COUNTY INFORMATION NOTICE I-64-11, AND FOOD AND NUTRITION SERVICE VERIFICATION REQUIREMENTS AND STATE OPTION CHART

<u>REASON FOR THIS TRANSMITTAL</u>
<input type="checkbox"/> State Law Change
<input type="checkbox"/> Federal Law or Regulation Change
<input type="checkbox"/> Court Order
<input type="checkbox"/> Clarification Requested by One or More Counties
<input checked="" type="checkbox"/> Initiated by CDSS

The purpose of this letter is to clarify the verification requirements in CalFresh, and to transmit a chart (attached), which lists mandatory and optional verification requirements and describes verification of expenses and what is needed if information is questionable. County Welfare Departments (CWDs) are to review and use this information to (a) simplify their verification policies where appropriate, (b) improve the timeliness of the application process; and (c) improve customer service. In general, counties should verify only the mandatory eligibility factors for CalFresh unless it is for the purpose of maximizing benefits.

While CalFresh households have primary responsibility for providing documentary evidence regarding key eligibility factors, counties can help reduce this burden and speed up processing time by the use of certain verification reduction strategies as detailed below:

- Ensuring mandatory verification is only requested when needed to document the eligibility of specific households (e.g., drug felons, noncitizens, sponsored noncitizens, etc.).
- Not limiting verification to any single type of document, if multiple sources are available.
- Utilizing collateral contacts made by the CWD to appropriate third-party sources.
- Utilizing self-certifications obtained through the household, where permitted.
- Only requesting “optional verification” for the purposes of maximizing benefits.
- Identifying “questionable information.”
- Not requiring verification for information that hasn’t changed at recertification or since the last report.

Rules and suggestions for implementing these verification reduction strategies are detailed below:

Use of Appropriate Mandatory Verification

The following items are some examples of eligibility factors that must be verified. An explanation of what verification is required follows each item. More detailed information is found at Manual of Policies and Procedures (MPP) § 63-300.5.

- **Able-Bodied Adults Without Dependents (ABAWD)** – For individuals subject to the CalFresh time limit who are satisfying the work requirement by working, by combining work and participation in a work program, or by participating in a work or workfare program that is not operated or supervised by the CWD; or have countable months in another state, the individuals’ work hours and/or countable months shall be verified (MPP § 63-410.21). Currently the U.S. Department of Labor’s Unemployment Insurance Service determined that California qualified for a waiver of ABAWD work requirement for Federal Fiscal Year (FFY) 2011 due to the high percentage of unemployment rate. Until October 1, 2012, the ABAWD work requirement will be waived for all counties within California which all counties chose to participate in (Refer to All County Information Notice I-64-11, dated September 26, 2011).
- **Eligible Noncitizen Status** – The CWD must determine if members of the household identified as noncitizens and applying for benefits are eligible noncitizens (MPP § 63-405.11 through .17 and .2). The household must present verification for each noncitizen member, but only if they are applying for benefits (MPP § 63-300.5(e)(8)). Verification may include immigration papers/forms/cards, certification of naturalization, etc. If no documentation is available, the noncitizen may contact the United States Citizenship and Immigration Service (USCIS) for documents or may sign a form authorizing the CWD to request verification of the noncitizen’s status

with USCIS. The CWD is required to assist all applicants in securing documents and may only contact USCIS if the noncitizen has given permission to do so.

- Child Support Obligation and Actual Payments – Before a child support payment is allowed as an exclusion from gross income, the CWD must verify the legal obligation to pay child support, the amount of the obligation, and the amount the household actually pays (MPP § 63-300.5(e)(10)). If verification is not provided, the exclusion is not allowed. Failure to verify payments is not a basis for denying or discontinuing a case if the person is otherwise eligible. The CWD is required to assist applicants in securing documents and with permission from the household, should assist the applicant household in securing child support payment verification from the Department of Child Support Services' (DCSS) automated system.
- Disability – The household must provide verification of disability unless the CWD already has verification on file (MPP § 63-300.5(e)(9)). Individuals receiving Supplemental Security Income (SSI) or Social Security (Title II) are considered disabled if they provide verification that they are receiving these benefits or if this information can be obtained electronically through the Applicant Income and Eligibility Verification System (IEVS). The same applies to recipients of Veterans Benefits or Railroad Disability Benefits. Otherwise, unless the disability is detectable without verification, the CWD must use the most current Social Security Administration (SSA) list of disabilities considered permanent under the Social Security Act for verifying disability. Refer to MPP § 63-300.5(e)(9) for more detailed information. Failure to verify a disability is not a basis for denying or discontinuing a case. If the disability cannot be verified within 30 days of the date of the application, the CWD shall determine the household's eligibility and benefit level by applying the gross income test.
- Identity – The household must provide a document to verify identity (MPP § 63-300.5(e)(3)). If documentary proof is not available; identity may be verified through a collateral contact. Acceptable documentary evidence may include a Social Security card or other document containing the Social Security Number, a driver's license, a work or school identification card, an identification card for health benefits or another assistance program, a voter registration card, a wage stub or a birth certificate. (Remember that counties have the duty to assist people to register to vote.) Additionally, if the household is applying for or already receiving Medi-Cal and identity has been verified via MEDs verification with Social Security Administration (SSA), then the verification of identity requirement in the CalFresh is considered to be met.

- Gross Nonexempt Income – Gross income must be verified by the household through wage stubs, a letter from the employer, award letter, Applicant IEVS, etc., (MPP §63-300.5(e)(1)). However, if verification of income has been unsuccessful after exhausting all attempts because the person or organization providing the income have failed to cooperate with the household, the CWD shall determine an amount to be used for the purpose of eligibility determination based on the best available information, which may include an affidavit completed by the household.
- Medical Expenses – Medical expenses must be verified before they can be allowed as deductions from gross income (MPP §63-300.5(e)(7)). If the expense cannot be verified, the deduction must be disallowed. Failure to verify medical expenses is not a basis for denying or discontinuing a case. The CWD is required to assist applicants in securing documents and should, with permission from the household, assist the applicant household in securing documents. Medical expenses may be deducted as a one-time only or have the expenses averaged out over the remaining months of their certification period (MPP § 63-502.33). Only the amount in excess of that expense shall be deducted each month.
- Residency – To the extent possible, verification of residency should be accomplished via information from other sources, such as rent or mortgage billing statement, utility billing statements, and identity documents (MPP § 63-300.5(e)(5)). If this cannot be accomplished, the CWD must use a collateral contact with a third party. No specific type of verification can be imposed, including requiring third-party contact.

For instances where verification of residency may be impossible due to homelessness, migrant farm worker status, or when the household is new to the community, see MPP § 63-300.5(e)(5)(A). In these circumstances, self-certification is acceptable for migrant farm workers and homeless households if the applicant, with the county's assistance, has made reasonable efforts to obtain verification and verification cannot be obtained and the applicant's statement regarding residency is not questionable. No length of residency may be imposed. In instances like this the CWDs can provide several options to ensure that clients without a mailing address receive notices by:

- Holding correspondence at the local office for pick up;
- Using the address of local shelter (with the shelter's permission);
- Using the address of a trusted friend or family member (with resident's permission); or
- Sending correspondence to a local post office as general delivery.

- Social Security Number (SSN) – Households must provide a SSN for each member of the household applying for benefits, but does not need to provide a SSN card (MPP § 63-404). If the household cannot provide a SSN for any member applying for benefits, the household must complete an application for the number and apply directly with SSA or show good cause why they cannot apply (MPP § 63-404.13). Once the SSN application is filed with SSA, benefits must be continued, providing all other eligibility criteria are met, pending verification through IEVS. More detailed information is found at MPP § 63-404. If no SSN is available for an individual in the household, benefits for the other household members must be issued if they are eligible.
- Student Exemption – Any individual who is age 18 through 49; physically and mentally fit for employment; and enrolled at least half-time, as defined by the institution, in an institution of higher education (as defined in MPP § 63-406.111(a)) shall be ineligible to participate in CalFresh unless that individual qualifies for a student exemption as specified in MPP § 63-406.2.

In order to be an eligible student and participate in CalFresh, a student must meet at least one of the following exemptions at the date of their interview: (1) be working for a minimum of 20 hours per week and receive gross weekly earnings at least equal to the federal minimum wage; (2) be approved for state or federal work study for the current school term; (3) be exerting parental control over a dependent household member under the age of six; (4) be exerting parental control over a dependent household member who has reached age six but is under age 12 and the CWD has determined that adequate child care services are not available to enable the individual to attend class and work 20 hours per week or participate in state or federal work study program; (5) be a CalWORKs recipient; (6) be assigned to or placed in an institution of higher education in compliance with the requirements of MPP § 63-406.216(a) through (e); or (7) be enrolled full-time in an institution of higher education and is a single parent with responsibility for the care of a dependent child under age 12.

Verification can include, but limited to pay stubs or letter from the employer that shows that the individual is working no more than 20 hours per week at minimum wage, an award letter from financial aid indicating that the individual is eligible for work study, documentation from school that the individual did not register for the next regular term, or, if that is not available, an affidavit from the student. If an individual claims to be mentally or physically unfit for employment and the unfitness is not evident to the CWD, verification may be required. Appropriate verification may consist of receipt of temporary or permanent disability benefits issued by governmental or private sources, or a statement from a physician, or licensed or certified psychologist.

- Utility Expenses – For the Standard Utility Allowance (SUA), if a bill for heating/cooling is not available, a statement suffices as verification that the household is incurring heating and/or cooling costs (MPP § 63-300.5(e)(6)). SUA is allowed if any heating and/or cooling costs are incurred apart from mortgage or rent payments. A statement also suffices as verification for households that do not qualify for a SUA but incurs expenses for at least two separate utilities (telephone, water, sewer, and garbage) other than heating and cooling are eligible for Limited Utility Allowance (LUA). A statement also suffices for a household incurring only a telephone expenses, or in its absence, an equivalent form of communication, is eligible to receive a telephone deduction referred to as Telephone Utility Allowance (TUA). If the household is not able to provide verification within the 10 day timeframe, the CWD should be able to determine eligibility and benefit level without verification for the deduction. If the recipient later provides verification, it should be considered, and if it would result in an increase in benefits, the CalFresh benefits should be increased.
- Shelter Costs - All County Letter (ACL) 00-19 amended CalFresh regulations (MPP Section 63-300.5, 63-504.3 and 63-505.4) for verifying shelter costs to provide counties flexibility. Federal regulations allowed states the option of mandating verification of any factors that affect household eligibility and benefit levels for which verification is not otherwise federally mandated. Therefore, routine verification of all shelter costs is not required. However, the CWD may elect to continue a county policy of requiring verification of shelter costs in accordance with ACL 00-19 (Note: ACL 00-19 preceded use of a mandatory SUA).
- Conditions of Eligibility for Certain Drug-Related Felony Convictions – If a household member has been convicted in a state or federal court of a felony after August 22, 1996 that includes an element of possession or use of a controlled substance, that member must, as a condition of eligibility, provide proof that the member has completed, participated in, is enrolled in or is on a waiting list for a government-recognized drug treatment program (MPP § 63-300.5(e)(11)). Other verification which shows that illegal use of the controlled substance has ceased is also acceptable (e.g., passing a drug test for employment). If proof is unavailable, the CWD must accept a self-certification under penalty of perjury as verification. The FS 26 is the form used for the applicant to certify under penalty of perjury, but it is not a required form. A written statement signed under penalty of perjury is also an acceptable form of certification. If the household member is able to self-certify and sign under penalty of perjury that they are no longer using a controlled substance, then CalFresh benefits shall be issued.
- Sponsored Noncitizen Information – A sponsored noncitizen must provide information about his/her sponsor in accordance with MPP § 63-405.7 unless the sponsored noncitizen claims to be indigent (MPP § 63-503.492(d)), is under 18

years of age, or “opts out” of receiving benefits (MPP § 63-300.5(e) (8)). Deemed income from the sponsor applies only if the sponsored noncitizen is determined “not indigent” and the sponsor has signed an enforceable Affidavit of Support (USCIS Form I-864 and/or Form I-864A). If the sponsor’s information for the non-indigent sponsored noncitizen cannot be verified, eligibility must be considered for all remaining members in the household (MPP § 63-503.492(d)).

Not Limiting Verification to any Single Type of Document if Multiple Sources are Available

All County Letter (ACL) 09-01 which describes types of verification and/or sources of proof, is a useful tool for identifying various types of acceptable verification. You may access this ACL and the attached forms from the California Department of Social Services (CDSS) web page at:

<http://www.cdss.ca.gov/lettersnotices/entres/getinfo/acl/2009/09-01.pdf>

Utilizing Collateral Contacts

With the approval of the applicant or recipient, collateral contacts must be used to confirm a household’s circumstances when verification cannot be provided by the household. The collateral contact may be made either in person or over the telephone. In instances where more than one person can verify, the CWD must not restrict acceptability of a collateral contact to a particular individual, but must be open to anyone who can be expected to provide an accurate third-party verification of the household’s statements. Examples of acceptable collateral contacts are employers, landlords, social services agencies, migrant service agencies, and neighbors of the household (MPP) § 63-300.5(h) (2)).

Utilizing Self-Certifications Where Permitted

Self-certification should be used in certain circumstances where the household is not able to provide the necessary verification through documentary evidence, collateral contact or home visits. Self-certification can be accepted in certain circumstances if all other proof is not available. Self-certification is acceptable as verification for certain eligibility factors such as: certain gross nonexempt income (e.g., cash payment for babysitting or yard work); meeting conditions of eligibility for certain people with drug-related felony convictions where the applicant must certify that their illegal use of controlled substances has ceased; or residency for migrant farm workers and homeless households (See MPP § 63-300.5(e)(1), (e)(5), and (e)(11)). All other mandatory eligibility factors such as most gross nonexempt income, noncitizen status, identity, SSN, child support payments, residency, utility expenses, medical expenses, sponsored noncitizen information, and disability require the household to provide some

type of documentary evidence or collateral contact for verification (see page 2 - 7 for the mandatory verification list and attached chart). Documentation in the case file must contain sufficient detail to permit a reviewer to determine the reasonableness and accuracy of the determination and an explanation as to why certain verification was accepted (MPP § 63-300.5(j)).

Only Requesting Optional Verification for the Purposes of Maximizing Benefits

CWDs should not request additional (optional) verification unless it is for the purpose of maximizing benefits. Counties should develop written county policies, which should be made available to the public, setting forth the standards for when such optional verification will be required. For example, the CWD must maintain the State CalFresh Manual in each local CalFresh office for examination by members of the public during regular work days and regular office hours (MPP §63-201.4).

Verifying Questionable Information

To be considered questionable, the information on the application must be inconsistent with statements made by the applicant and/or inconsistent with other information received by the CWD. When determining if information is questionable, the CWD must base the decision on the household's individual circumstances. For example, a household's report of no income while still meeting its financial obligations could justify the need for additional verification. These circumstances may not, in and of themselves, be grounds for a denial. The CWD must explore with the household how it is managing its finances, whether the household receives excluded income or has resources, and how long the household has managed under these circumstances. Household composition, liquid resources and loans, and citizenship specified in MPP § 63-300.5(f)(2), (g)(1) and (2) provide procedures to determine if information provided by the household is questionable. Once a county determines an item is questionable, then it must be verified (MPP § 63-300.5(g)).

Where verification is required to resolve questionable information, the CWD must document why the information was considered questionable, or at a minimum indicate where in the case file the inconsistency exists, and what documentation was used to resolve the questionable information. The CWD must also document the reason why an alternate source of verification, such as a collateral contact or home visit, was needed, and the reason a collateral contact was rejected and an alternate requested (MPP § 63-300.5(j)).

Verification for Information that Hasn't Changed at Recertification or Since the Last Report

All changes reported on the application for recertification must be subject to the same verification requirements that apply at initial certification (MPP §.63-300.5(a)(2)). Any information that has changed in source or amount must be verified, if it is a required item or if it is questionable. Information which is inaccurate, incomplete, outdated or inconsistent must be re-verified during the recertification process. Otherwise, if information has not changed at recertification or since the last report and was previously verified, re-verification must not be imposed upon the household.

Reporting Requirements on the Quarterly Report (QR) 7

The QR recipients must provide information and answers to all questions and items on the QR 7 and attest, under penalty of perjury, that they have truthfully reported all required information. The following items are reporting requirements which require verification with the QR7 (MPP § 63-508.32):

- Gross nonexcluded earned income and nonexcluded unearned income when first reported on the QR7 and when there is a change in the source and amount of income received except as specified in Sections 63-504.325(a) and 63-505.311.
- Source and amount of all excluded income when first reported on the QR7 and any changes in the source and amount of the income.
- Dependent care costs which have changed since the last report or when there is questionable information which is inaccurate, incomplete, outdated, or inconsistent.
- If the household voluntarily reports a change in its medical expenses and that change would increase the household's allotment, the CWD shall not make the change without verification.
- The CWD shall act on reported changes without requiring verification if the changes would decrease the household's allotment or makes the household ineligible, although verification which is required shall be obtained prior to the household's recertification (MPP § 63-508.616(b)(2)).
- The household can opt to provide verification for actual costs of producing self-employment income, if they wish to claim more than the standard deduction of 40% of gross earned income and it has provided the verification with the QR 7. Otherwise, the cost of producing self-employment income shall default to the standard deduction of 40% of gross earned income from self-employment.
- Residency when there is a change. If the CWD elects the option to require verification of shelter costs, verification shall be provided at application, when a change in residence by the household occurs, or at recertification.
- Social security numbers or citizenship or noncitizen status for household members when there is a change.

- A change in the legal obligation to pay child support to a person not in CalFresh household and/or an increase in the amount of child support payments.
- A change in household composition or loss of job or source of earned income on the applicability of the work registration or voluntary quit requirements.
- The effect of a reported change in resources on a household's total resource limit.

Verification must be requested immediately from the recipient when there is a decrease in income or a new household member is reported in the household, or for other changes that would require verification when benefits would increase. Action to increase or decrease benefits shall not take place until verification is received. The recipient must be allowed 10 days to provide the requested verification. A "No Change NOA" must be sent to the recipient when benefits cannot be increased due to non-receipt of verification. The "No Change NOA" must be sent within 30 days of the reported change. The NOA must remind the recipient to re-report the change on the QR7 and submit the verification of the reported change at that time.

The CWD shall not consider the QR7 incomplete if information regarding child support disregard payments has not been included. If the household submits information and/or verification with the QR7 which the CWD determines to be questionable, the CWD shall notify the household as specified in Section 63-508.62. The household shall be allowed until the extended filing date to submit the necessary verification/clarification.

Verification Responsibilities for Change Reporting Households

The CWD shall not impose any CalFresh reporting requirements on non-quarterly reporting households except as provided in Sections 63-505.511 through .518. Changes reported during the certification period shall be subject to the same verification procedures that apply at initial certification, with the following exceptions:

- Changes in the sources of income, including starting or stopping a job or changing jobs.
- Changes in the amount of earned income of more than \$100 per month since the last time the household's allotment was calculated.
- Changes in the amount of unearned income of more than \$50.
- All changes in household composition, such as the addition or loss of a household member.
- Residency when there is a change. If the CWD elects the option to require verification of shelter costs, verification shall be provided at application, when a change in residence by the household occurs, or at recertification.
- A change in the amount of child support payments made to a non-household member, and/or a change in the legal obligation to pay child support.

- A reduction of work effort to less than 20 hours per week, or average monthly 80 hours a month, for purposes of determining whether an Able-Bodied Adult Without Dependents (ABAWD) has satisfied the work requirement (e.g., migrant/seasonal farm workers). The ABAWD work requirement is currently waived for FFY 2012.

Applications must be Accepted without Verification

Counties are also reminded that an application must be accepted if it is signed and lists the applicant's name and address (See MPP § 63-300.32). Counties should never advise an applicant that he/she cannot turn in an application until all verification has been provided.

If you have any questions regarding the content of this letter, please contact Rosie Avena in the CalFresh Policy Bureau at (916) 654-1514, or by e-mail at: rosie.avena@dss.ca.gov.

Sincerely,

Original Document Signed By:

LINDA PATTERSON, Chief
CalFresh Branch

Attachment

Mandatory Verification Requirements

Item of Eligibility	Mandatory	Optional	Program Flexibility
<p>ABAWD – additional verification</p> <ul style="list-style-type: none"> - 273.2 (f)(1)(xiv) - 63-300.5(g)(3) - 63-410.2 	<p>Yes, hours worked if subject to the time limit and countable months in another state. Currently suspended.</p>	<p>The U.S. Department of Labor’s Unemployment Insurance Service determined that 49 states or geographic areas, including California, qualify for a waiver of the able-bodied adults without dependents (ABAWD) work requirement for FFY 2012. The waiver became effective October 1, 2011, for all counties within California.</p>	<ul style="list-style-type: none"> • ABAWD Statewide Waiver for FFY 2011 waived the ABAWD work requirement for all or portion of California that meet at least one of several federally-established waiver criteria, including being eligible for extended Unemployment benefits and Labor Surplus Area (LSA). • With the passage of the American Recovery and Reinvestment Act (ARRA) of 2009, the restrictions on CalFresh eligibility for ABAWDs were suspended.
<p>Eligible Noncitizens Status</p> <ul style="list-style-type: none"> - 273.2 (f)(1)(ii) - 63-300.5(e)(2) - 63-405.11 through .17 	<p>Yes, only if the noncitizen member(s) is applying for benefits.</p> <p>Verification may include: Immigration papers, forms, or cards, or certification of naturalization.</p>		<p>The CWD is required to assist all applicants in securing documents and may only contact USCIS if the noncitizen has given permission to do so.</p>
<p>Child Support</p> <ul style="list-style-type: none"> - 273.(f)(1)(xii) - 63-300.5(e)(10)(A) through (C) - 63.502.122 	<p>Yes, must verify legal obligation, the amount of obligation, and the monthly amount actually paid.</p> <p>Verification may be from the Department of Child</p>	<p>California treats legally-obligated child support payments as income exclusion instead of a deduction.</p>	<p>If not verified, income exclusion is not given. Lack of verification is not a basis for delaying or denying benefits.</p>

Mandatory Verification Requirements

Item of Eligibility	Mandatory	Optional	Program Flexibility
	Support Services automated system.		
Disability <ul style="list-style-type: none"> - 273.2 (f)(1)(viii) - 63-300.5(e)(9)(A) through (I) - 63-102(e)(1)(B) through (K) 	Yes, if applicable. Proof that a household is receiving Social Security Income (SSI), Social Security (Title II) benefits, or through Applicant Income and Eligibility Verification System (IEVS).		For some types of disability, observation by the worker suffices. Lack of verification is not a basis for delaying or denying benefits.
Household Composition <ul style="list-style-type: none"> - 273.2(f)(1)(x) - 63-300.5(g)(1)(A) and (B) - 63-402.15 	Yes, if questionable.		Households shall provide verification for individuals who claim to be a separate household from those with whom they reside or whom they reside based on the various age and disability factors
Identity <ul style="list-style-type: none"> - 273.2 (f)(1)(vii) - 63-300.5(e)(3) - 63-300.5(h)(2) 	Yes, of the person making the application. Examples of acceptable documentary evidence include, but are not limited to: a social security card, driver's license, picture ID, work or school ID, health benefits ID, voter's registration card, wage stubs or a birth certificate.	Yes, for other household members.	Any document which reasonably establishes identity must be accepted and no requirement for a specific type of document may be imposed. County must assist in obtaining verification, if needed. Collateral contact must be attempted if there is no documentation available. If the household is also receiving Medi-Cal and identity was verified via MEDs verification with Social Security Administration (SSA), then verification of identity requirement has been met for the purpose of the CalFresh application.
Gross Nonexempt Income <ul style="list-style-type: none"> - 273.2 (f)(1)(i) - 63-300.5(e)(1) - 63-502.1 	Yes, income must be verified through wage stubs, a letter from the employer, award letter,	The state opted to exclude certain types of income not counted under TANF. Also,	If verification of income is unsuccessful after exhausting all attempts, the eligibility worker can determine an amount to be used for certification purposes based on the

Mandatory Verification Requirements

Item of Eligibility	Mandatory	Optional	Program Flexibility
	Applicant IEVS, etc.,	this option does not apply to wages, salaries, benefits from major public assistance programs, regular government payments, worker's compensation, and child support payments.	best available information. Best available information may include an applicant's affidavit.
Medical Expenses - 273.2 (f)(1)(iv) - 63-300.5(e)(7) - 63-502.33	Yes, if deduction is sought. No need to re-verify if unchanged or change is \$25 or less.		If verification causes delay in certification, eligibility can be determined without deduction. Failure to verify expenses results in disallowance of deduction, not denial of application.
Residency - 273.2 (f)(1)(vi) - 63-300.5(e)(5)(A) - 63-301.7 - 63-401	Yes, with some exceptions. To the extent possible, verification of residency should be accomplished via information from other sources, such as rent or mortgage billing statement, utility billing statements, and identity documents.		Exceptions include homeless households, some migrant farmworker households, or households newly arrived in project area. Residency can be verified in conjunction with other forms of verification (e.g., rental agreement).
Liquid Resources and Loans - 273.2(f)(3) - 63-300.5(f)(2) - 63-501.1	Yes, if questionable. Liquid resources are counted for expedited service benefits only. When verifying whether		Categorically eligible households do not have to meet the resource limits under 273.8(b). AB 433, Chapter 625, Statutes of 2008 requires CDSS to establish a program of

Mandatory Verification Requirements

Item of Eligibility	Mandatory	Optional	Program Flexibility
	income is exempt as a loan, a simple statement signed by both parties which indicates that the payment is a loan and must be repaid shall be sufficient.		Modified Categorical Eligibility (MCE) for CalFresh in accordance with Section 5(a) of the federal Food and Nutrition Act of 2008 to not consider resources, for Non-Assistance CalFresh households (NACF), for the purpose of determining eligibility for CalFresh at initial and/or recertification.
Social Security Numbers - 273.2 (f)(1)(v) - 63-300.5(e)(4) - 63-404	Yes	A social security card is not required to be made available. Only the number must be verified.	Proof of application for Social Security number will suffice if no number exists.
Student Exemption - 273.2 (f)(1)(xi) - 63-406.2	Yes, for those whose physical or mental unfitness is not evident.	If the county elects to mandate verification.	In order to be an eligible student and participate in CalFresh, any student must meet at least one of the following exemptions at the date of their interview: (1) be working for a minimum of 20 hours per week and receive gross weekly earnings at least equal to the federal minimum wage; (2) be approved for state or federally work study for the current school term; (3) be exerting parental control over a dependent household member under the age of six; (4) be exerting parental control over a dependent household member who has reached age six but is under age 12 and the CWD has determined

Mandatory Verification Requirements

Item of Eligibility	Mandatory	Optional	Program Flexibility
			<p>that adequate child care services are not available to enable the individual to attend class and work 20 hours per week or participate in state or federal work study program; (5) be a CalWORKs recipient; (6) be assigned to or placed in an institution of higher education though or in compliance with the requirements of MPP § 63-406.21(a) through (e); or (7) be enrolled full-time in an institution of higher education and is a single parent with responsibility for the care of a dependent child under age 12.</p> <p>If an individual who claims to be mentally and physically unfit and the unfitness is not evident to the CWD, verification may be required. Appropriate verification may consist of receipt of temporary or permanent disability benefits issued by governmental or private sources, or a statement from a physician, or licensed or certified psychologist.</p>
<p>Utility Expenses</p> <ul style="list-style-type: none"> - 273.2 (f)(1)(iii) - 63-300.5(e)(6) - 63-502.363 	<p>Yes. Household must verify that they incurred heating and/or cooling cost separate and apart from their rent or mortgage payments or if the costs incurred is questionable.</p>	<p>Yes. The state elected a Standard Utility Allowance (SUA), Limited Utility Allowance (LUA) and Telephone Utility Allowance (TUA) –</p>	<p>The SUA is mandatory for all households which incur heating or cooling costs separate and apart from their rent or mortgage payments. This includes residents of rental housing who are billed on a monthly basis by their landlords for actual usage as determined through</p>

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		<p>Food Stamp Reauthorization Act of 2002. No option to claim actual expenses.</p>	<p>individual metering. Households that are not eligible for SUA, but incur expenses for at least two separate types of utilities (other than heating and cooling) are eligible for LUA. Allowable utilities include telephone, water, sewerage, and garbage or trash collection. If a household only incurs telephone costs, is entitled to TUA of \$20.</p> <p>Failure to verify expenses results in disallowance of deduction, not denial of application.</p>
<p>Condition of Eligibility for Drug Felon</p> <ul style="list-style-type: none"> - 273.11(m) - 63-300.5(e)(11)(A) through (E) - 63-402.229 	<p>Yes, if a household member has been convicted in a state or federal court of a felony that includes the possession or use of a controlled substance.</p>		<p>The member must provide proof that he/she has completed, participated in, is enrolled in or is on a waiting list for a government-recognized drug treatment program. Other evidence that the illegal use of controlled substances has ceased is acceptable. The member must state what the other evidence is and provide proof (e.g., passing a drug test for employment). If proof is unavailable, the CWD must accept a self-certification under penalty of perjury as verification. The CWD must consider the evidence and must clearly document the reasons upon which denial or approval of benefits is made.</p>
<p>Sponsored Noncitizen Information</p> <ul style="list-style-type: none"> - 273.4 (c) - 63-300.5(e)(8)(A) through (I) - 63-405.7 	<p>Yes, unless the sponsored noncitizen claims to be indigent, is under 18 years of age, or opts out of receiving benefits.</p>		<p>If the sponsored noncitizen is seeking benefits, deemed income from the sponsor applies only if the sponsor has signed an Affidavit of Support (USCIS Form I-864 and/or Form I-864A). If the sponsored</p>

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			noncitizen's sponsor's information cannot be verified, eligibility shall be considered for all remaining people in the household.
Citizenship <ul style="list-style-type: none"> - 273.4(a) - 63-300.5(g)(2)(A) and (B) - 63-503.442 	Yes, if questionable		Acceptable forms of verification include birth certificates, religious records, certificates of citizenship or naturalization provided by USCIS or U.S. passports