

FOOD DISTRIBUTION PROGRAM ON INDIAN RESERVATIONS

– HOUSEHOLD CERTIFICATION TRAINING –



MODULE 3

Application Processing, Interviews & Verification

Introduction:

- » The Food Distribution Program on Indian Reservations (FDPIR) is a federal program that provides USDA Foods to low-income households living on Indian reservations, in designated areas near reservations, and in the State of Oklahoma.
- » FDPIR Household Certification Training will help Indian Tribal Organization (ITO) and State agency certification workers and their supervisors successfully administer the program.
- » The training is comprised of nine modules, designed to be taken in any order. At the end of each module is a short quiz you may take to test your knowledge of the key learning points covered in the module. When you finish all nine modules, you may test your knowledge of the entire training by taking the post-test.
- » The knowledge gained in this training will help you provide the best support possible for current and potential FDPIR participants.

Acronyms Used in Module

The following acronyms appear in this module:

FDPIR – Food Distribution Program on Indian Reservations

FNS – Food and Nutrition Service

GA – General Assistance

ITO – Indian Tribal Organization

PA – Public Assistance

SNAP – Supplemental Nutrition Assistance Program

USDA – United States Department of Agriculture

Learning Module 3:

Application Processing, Interviews & Verification

- » Refer to FNS Handbook 501 for more information about topics covered in this module.
- » On each slide in this module, you can find the specific section in the handbook where the topic is covered in greater detail.

Learning Objectives:

After completing this module, learners will:

- » Understand the application process and be able to assist households in completing the application form.
- » Know what information the ITO/State agency must include on an application form.
- » Know when an application filled out by an applicant is considered complete.
- » Understand the requirements for regular processing timeframes and expedited service timeframes.
- » Determine if a Public Assistance/General Assistance household is eligible for FDPIR.
- » Know how to conduct an interview.
- » Know the general rules on verification.
- » Be able to advise an applicant household of its rights and responsibilities.

Application Process

Source: FNS Handbook 501, Section 3100

» The application process begins with a request for an application and ends with notification to the applicant household of its eligibility/ineligibility. The following is a list of steps in the application process:

- ✓ Making the application form available to applicant households, including mailing application forms to households at their request (see FNS Handbook 501, Section 3150);
- ✓ Providing required assistance to the household in completing the application form;
- ✓ Interviewing an appropriate member of the household or an authorized representative (covered in more detail later in this Module);

(continued on next page)

Application Process (continued)

Source: FNS Handbook 501, Section 3100

- Obtaining necessary verification (covered in more detail later in this Module);
- Advising the household of its rights and responsibilities (see FNS Handbook 501, Section 3600); and
- Preparing necessary documents to authorize or deny distribution of USDA Foods to the household.

Application Form

Source: FNS Handbook 501, Section 3110

- » The application form used by the ITO/State agency must be acceptable to the FNS Regional Office.
- » It must be understandable and easy to complete.
- » It must include the FDPIR nondiscrimination statement, which prohibits discrimination on the basis of age, race, color, sex, disability, religion, political beliefs, and national origin, and includes the appropriate address and telephone number for filing a discrimination complaint.

Application Form (continued)

Source: FNS Handbook 501, Section 3110

- » The application form must advise the applicant household of program violations.
- » The application form must include a description of the following program violations in understandable terms and in prominent and boldface lettering:
 - Participating in FDPIR and the Supplemental Nutrition Assistance Program (SNAP) in the same month;
 - Misusing USDA Foods (e.g., selling or trading USDA Foods); and
 - Misrepresenting household circumstances in order to receive benefits to which the household is not entitled. This includes misstatements about household income or the number of household members.

Filing an Application

Source: FNS Handbook 501, Sections 3120-3141

- » An applicant household has the right to file an application the same day, if the contact is made to the FDPIR office during office hours (see FNS Handbook 501, Sections 3140 and 3141).
- » An application is considered to be complete for filing purposes if it contains (see FNS Handbook 501, Section 3120):
 - The applicant's name;
 - The applicant's address; and
 - The signature of a responsible household member or an authorized representative.

Filing an Application (continued)

Source: FNS Handbook 501, Sections 3120-3141

» A household member or authorized representative can submit the application (see FNS Handbook 501, Section 3130):

- In person at the FDPIR office or tailgate site;
- By mail;
- By email/scan (as long as it is readable and the signature is clear); or
- By fax (as long as it is readable and the signature is clear).

» Once received, the certifier must document the receipt date (see FNS Handbook 501, Section 3140).

Screening for Expedited Service

Source: FNS Handbook 501, Section 3340

- » Some applicant households may be destitute and need food immediately. Your ITO's/State agency's application processing procedures must include procedures for identifying households that qualify for expedited service.

- » An applicant household would qualify for expedited service if:
 - It reports no income in the current month; or

 - The certifier believes the household would likely be eligible for FDPIR and the household would otherwise suffer hardship if it had to wait longer to receive USDA Foods.

- » If the certifier determines that the household qualifies for expedited service, the certifier must document the household's case file to show the basis for determining that the household qualified for expedited service.

Processing Time Frames

Source: FNS Handbook 501, Sections 3100; 3300; 3340

- » Households that qualify for expedited service must be provided an opportunity to receive USDA Foods no later than one business day (excluding weekends and holidays) after an application was submitted.
 - » If possible, the ITO/State agency must provide same-day service if the household would suffer hardship if required to return to the office the next day.
 - » The ITO/State agency must ensure that USDA Foods are available to distribute to expedited service households.

- » Households that are eligible for FDPIR but do not qualify for expedited service, must be provided an opportunity to receive USDA Foods as soon as possible, but no later than seven business days (excluding weekends and holidays) after an application is submitted.

Expedited Service Verification Procedures

Source: FNS Handbook 501, Sections 3341; 3509

- » The ITO/State agency must verify the household's identity and address through:
 - readily available documentary information, such as a driver's license; or
 - a collateral contact.
- » If possible, the following must be verified within the one-day expedited service processing time frame:
 - gross non-exempt income;
 - expenses to qualify the household for child support income deduction;
 - expenses to qualify the household for medical expense income deduction;
 - an expense to qualify the household for shelter and utility expense income deduction; and
 - participation in SNAP.
- » In approved near areas and in FNS service areas in Oklahoma, Indian Tribal Household status must be verified.

Expedited Service Verification Procedures (continued)

Source: FNS Handbook 501, Sections 3341; 3509

- » The ITO/State agency must make every effort within the expedited service processing time frame to check with SNAP officials to ensure that the household is not currently participating in SNAP.

- » If identity and address is verified, but other necessary verifications cannot be completed in time, the ITO/State agency must postpone completion of the verifications and certify the household for one month on an expedited service basis.

- » All regularly required verifications must be completed before the expedited service household can receive issuances of USDA Foods beyond the first month.

Case Study 1 Scenario:

Mary lost her job on June 20 and applies for FDPIR on July 1 for herself and her two children. The certifier determines that Mary's household qualifies for expedited service because Mary reports no income for the month of July. The certifier verifies Mary's identity and address. She also verifies through the local SNAP office that the household is not certified for SNAP.

The certifier is not able to complete verification of income and income deductions within the one-day expedited service processing standard. However, she is aware that the business where Mary worked has closed down.

Can Mary's household receive USDA Foods for July even though the certifier cannot complete all of the verifications?

Can Mary's household receive USDA Foods in August?

Case Study 1 Solution:

Yes. Because the certifier verified Mary's identify and address, the household can receive USDA Foods for the month of July.

Once all of the remaining verifications are completed, Mary's household will be able to receive USDA Foods in August, if otherwise eligible.

Public Assistance (PA) /General Assistance (GA) Households

Source: FNS Handbook 501, Sections 3200-3224; 3310

- » ITOs/State agencies that are responsible for and administer both FDPIR and Public Assistance (PA) or General Assistance (GA) programs may allow households to apply for FDPIR at the same time as PA or GA benefits.
- » If the ITO/State agency allows joint processing, it may use joint application forms that contain all of the information necessary to determine eligibility.
- » Alternatively, the ITO/State agency may attach a form to the PA or GA application for other information required to determine eligibility for FDPIR. The application must clearly state that the household is applying for both PA or GA and FDPIR benefits.
- » For more detailed information about the special application process for PA and GA households, review FNS Handbook 501, sections 3200 through 3224 and 3310.

Certification Interviews

Source: FNS Handbook 501, Sections 3600-3620

- » Once a household submits its FDPIR application, a certifier must conduct an interview before the household can become certified.
- » All applicant households must be interviewed. There are no exceptions.
- » The purpose of the certification interview is to ensure that the certifier has all information needed to determine eligibility.
- » The certifier should not simply review the information that appears on the application form, but must explore and resolve unclear and incomplete information.
- » If the household is also applying for PA or GA, the certifier must conduct a joint interview unless he or she is unable to do so within the FDPIR processing time standards.

Certification Interviews (continued)

Source: FNS Handbook 501, Sections 3600-3620

- » The interview is an official and confidential discussion of the household's circumstances. The applicant's right to privacy must be protected during the interview. Therefore, the facility in which the interview is conducted must be adequate to preserve the privacy and confidentiality of the interview.
- » The individual interviewed may be the head of household, spouse, other responsible household member or an authorized representative. For more information about authorized representatives, review Module 2: Household Composition.
- » The interview may be conducted in the FDPIR office, at a tailgate site, by telephone, or in the applicant's home. Note: No household can be interviewed by telephone for any two consecutive certifications. A telephone interview must be followed by a face-to-face interview at the household's next recertification.
- » If the interview takes place in the applicant's home, the certifier must attempt to schedule home visits in advance, but must also ensure that the eligibility determination is completed within the seven-day processing time frame.

General Rules on Verification

Source: FNS Handbook 501, Sections 3500-3550

- » In addition to conducting a household interview, the ITO/State agency must verify certain household circumstances prior to certification.

- » Verification is the use of third party information or documentation to establish the accuracy of statements on the application (see FNS Handbook 501, Section 3500).

- » The acceptable types of verification, in order of acceptance, are (see FNS Handbook 501, Section 3502):
 - documentary evidence;
 - collateral contacts; and
 - home visits.

Documentary Evidence

Source: *FNS Handbook 501, Section 3502*

- » Documentary evidence is written confirmation of household statements. Paystubs, receipts, canceled checks, signed statements from non-household members who are knowledgeable about the household's circumstances are all examples of documentary evidence.
- » The household has primary responsibility for providing documentary evidence to support its statements and resolve questionable information. If it would be difficult or impossible for the household to obtain documentary evidence in a timely manner, or the ITO/State agency can do so more quickly than the household, the ITO/State agency must offer assistance to help the household obtain it.
- » The ITO/State agency must accept any reasonable documentary evidence from the household, as long as it adequately verifies the household's statements.
- » Whenever documentary evidence cannot be obtained, the certifier must use alternate sources of verification such as collateral contacts and home visits.

Collateral Contacts

Source: FNS Handbook 501, Section 3502

- » A collateral contact is someone outside of the household that can verbally confirm statements made by the applicant household.

- » A collateral contact can be an employer, landlord, neighbor, dependent care provider, or other person outside the household.

- » The certifier is responsible for obtaining verification from the collateral contact. Generally, verification is obtained from collateral contacts either in person or over the phone.

- » The certifier may ask for another collateral contact if the originally named collateral contact cannot be expected to provide accurate third party verification.

Home Visits

Source: FNS Handbook 501, Section 3502

- » Home visits are used only when documentary evidence and collateral contacts cannot be obtained.
- » The certifier must attempt to schedule the home visit in advance, but must also ensure that the eligibility determination is completed within the required processing time frame.

Mandatory Verification

Source: FNS Handbook 501, Section 3504

» Whether the certifier verifies household information via documentary evidence, collateral contacts, or home visits, the certifier must verify the following (except for expedited service and categorically eligible households):

- Gross non-exempt income;
- Expenses to qualify the household for the child support income deduction;
- All allowable expenses to qualify elderly and/or disabled household members for the medical expense income deduction; and
- Proof of at least one allowable monthly expense to qualify the household for the shelter and utility expense income deduction.

» The certifier must also verify that the household is not currently participating in SNAP.

» In FNS service areas in Oklahoma and in approved near areas outside participating Indian reservations, Indian Tribal Household status must be verified (see Module 4: Financial and Non-Financial Eligibility Criteria).

Verification of Income Deductions

Source: FNS Handbook 501, Section 3539

» Verification is required for the child support deduction, the medical expense deduction, and the shelter and utility expense deduction. For all other deductible expenses, verification is necessary only when the claimed expense is questionable.

» Child support deduction: Applies only to child support payments to or for a nonhousehold member. The certifier must obtain verification of:

- The household's legal obligation to pay child support;
- The amount of the obligation; and
- The monthly amount of child support the household actually pays.

Verification of Income Deductions (continued)

Source: FNS Handbook 501, Section 3539

» Medical expense deduction: Applies to households that incur monthly medical expenses in excess of \$35 by any household member who is elderly or disabled. The certifier must obtain verification that the incurred cost is an allowable, out-of-pocket medical expense for elderly and/or disabled household members only.

» Shelter and utility expense deduction: The shelter and utility expense income deduction applies to households that incur shelter and/or utility expenses. The certifier must obtain verification that at least one allowable shelter or utility expense is incurred by the house hold on a monthly basis.

Allowable expenses for both the medical and shelter and utility income deductions are discussed further in Module 4: Financial and Non-Financial Eligibility Criteria.

Case Study 2 Scenario:

Pete applies for FDPIR and during his interview states that he pays \$250 every month in child support to a child that does not live in his home. He provides the certifier pay stubs that show \$125 being garnished from his check twice a month.

Can Pete's household receive the child support income deduction in the amount of \$250 based solely on this documentation?

Case Study 2 Solution:

No. Pete's paystubs serve as verification of the monthly amount of child support Pete's household actually pays. However, the certifier must also verify Pete's legal obligation to pay child support and the amount of that obligation.

The certifier informs Pete that he will need to provide a copy of the court order or similar documentation that verifies his legal obligation to pay child support and the amount of that obligation in order to receive the child support income deduction.

Case Study 3 Scenario:

Anne applies for FDPIR and during her interview states that she pays \$300 every month in shelter and utility expenses. She provides the certifier receipts for shelter/utility bills she paid that total \$250. The certifier verifies that the receipts are for allowable costs.

Can Anne's household receive the shelter and utility expense deduction based solely on this documentation?

Case Study 3 Solution:

Yes. In fact, the certifier only needs to obtain verification that *at least one* allowable shelter and utility expense is incurred by the house hold on a monthly basis. Anne does not need to show proof of all of her shelter and utility expenses.

Important Note: The deduction amount of the shelter and utility expense deduction is a regional standard amount and listed in Exhibit M of the FNS Handbook 501.

The Shelter and Utility Expense income deduction is also covered in more detail in Module 4: Financial and Non-Financial Eligibility Criteria and Module 5: Eligibility Determinations and Assigning Certification Periods.

Questionable Information

Source: FNS Handbook 501, Section 3505

- » All other household information must only be verified if questionable.

- » To be considered questionable, the information on the application must be inconsistent with:
 - Statements made by the applicant;
 - Other information on the application; and/or
 - Other information received by the certifier.

Requirement for Advising Applicant Households of Rights and Responsibilities

Source: FNS Handbook 501, Sections 3101; 3141; 3600

- » During the application process, the certifier must advise the applicant household of its rights and responsibilities.

- » It is recommended, but not required, that the certifier provide an attachment to the application form that the household may keep that describes its rights and responsibilities.

Applicant Household's Rights and Responsibilities

»The household's rights and responsibilities include:

- » Right to request a fair hearing (see FNS Handbook 501, Section 3101). The household must be advised in writing of this right.
- » Right to same-day filing (see FNS Handbook 501, Section 3141).
- » Right to file an application before the interview is held (see FNS Handbook 501, Section 3141).
- » Right to file an application with just name, address, and signature (see FNS Handbook 501, Section 3141).
- » The application processing time frames (see FNS Handbook 501, Section 3300).
- »The household's responsibility to report specific changes in household circumstances (see FNS Handbook 501, Section 5141).

Failure to Cooperate/One-Month Certification Pending Completion of Verification

- » If a household fails to cooperate in attempts to arrange the interview and the application does not contain enough information to make a determination of eligibility, the certifier will take no further action on the application (see FNS Handbook 501, Section 3620).
- » If a household fails to provide requested documentation to verify income and/or income deductions within the seven-day processing time frame, but the application appears to contain all necessary financial information and the household appears to be eligible, the certifier will certify the household for one month pending completion of the required verification (see FNS Handbook 501, Sections 3320 and 5101).
- » All regularly required verifications must be completed before the household can receive issuances of USDA Foods beyond the first month (see FNS Handbook 501, Sections 3320 and 5101).

Refusal to Cooperate

Source: FNS Handbook 501, Section 3620

- » If the applicant household refuses to cooperate with any part of the application process, the certifier must deny the application at the time of the refusal to cooperate.
- » “Refuses to cooperate” means that the household is able to cooperate, but clearly demonstrates that it will not take actions necessary for the completion of the application process.
- » For example, if a household refuses to be interviewed instead of merely failing to show up for the interview, the application will be denied for refusal to cooperate.
- » If the household is denied for refusal to cooperate, the household may reapply, but cannot be determined eligible until it cooperates.

Abusive Applicants

Source: FNS Handbook 501, Section 3170

- » The certifier may terminate the application process if an applicant becomes verbally or physically abusive to FDPIR staff.

- » The safety of FDPIR staff is of utmost importance. Every effort should be made to ensure the safety of FDPIR staff, including the physical removal of abusive clients from the FDPIR office by security officers or local law enforcement.

Voluntary Withdrawal of Applications

Source: FNS Handbook 501, Section 3160

- » An applicant household may voluntarily withdraw its application at any time prior to the eligibility determination.

- » The withdrawal request may be verbal or in writing.

- » The certifier must document in the case file the reason for the withdrawal, if given, and that contact was made with the household to confirm the withdrawal. The certifier must advise the household of its right to reapply.

Conclusion:

Application Processing

- » As soon as a household requests an application form, the ITO/State agency must provide it in person or via mail.
- » Households have a right to file an application on the same day they contact the FDPIR office.
- » The application form must be understandable and easy to read, and must include the FDPIR nondiscrimination statement, information on filing a discrimination complaint, and describe the FDPIR program violations (for example, participating in FDPIR and SNAP in the same month; misusing USDA Foods; and misrepresenting household circumstances).
- » Applications are considered complete if they contain the name, address, and signature of a responsible household member or an authorized representative.
- » Applications can be filed in person, by mail, by email/scan, or by fax before the interview is held.

Conclusion (continued):

Expedited Service

- » Households qualify for expedited service if they report no income or if the certifier believes they would be eligible and would suffer hardship if they had to wait to receive USDA Foods.
- » Households qualifying for expedited service must be provided an opportunity to obtain USDA Foods no later than one business day after submitting the application.
- » Households that do not qualify for expedited service must be provided an opportunity to obtain USDA Foods no later than seven business days after submitting the application.
- » In certifying households that qualify for expedited service, the ITO/State agency must, at a minimum, verify the household's identity and address. The certifier must also make every effort within the one-day expedited service processing time frame to verify income, income deductions, questionable information, and that the household is not participating in SNAP.
- » If verification of all necessary items other than identity and address cannot be completed within the one-day time frame, the ITO/State agency will certify the household for one month. All necessary verifications must be completed before the household can receive USDA Foods beyond the first month.

Conclusion (continued):

PA/GA Households

» ITOs/State agencies may allow a household to apply for FDPIR at the same time it applies for PA and GA benefits using joint application forms.

Interviews

» Before a household can be certified, a certifier must interview the head of the household, spouse, another responsible household member, or an authorized representative, to ensure that the certifier has all information needed to determine eligibility.

» The interview may be conducted in the FDPIR office, at a tailgate site, by telephone, or in the applicant's home, but the applicant's right to privacy must be protected. No household can be interviewed by telephone for any two consecutive certifications.

Conclusion (continued):

Verification

- » Before completing certification, the ITO/State agency must verify certain household circumstances via documentary evidence, collateral contacts, or home visits.
- » With the exception of expedited service and categorically eligible households, the certifier must verify:
 - the household's gross non-exempt income;
 - expenses to qualify the household for the child support income deduction including:
 - The household's legal obligation to pay child support;
 - The amount of the obligation; and
 - The monthly amount of child support the household actually pays;
 - all allowable expenses to qualify elderly and/or disabled household members for the medical expense income deduction; and
 - proof of at least one allowable monthly expense to qualify the household for the shelter and utility expense deduction.

Conclusion (continued):

Verification (continued)

- » The certifier must also verify that the household is not currently participating in SNAP.
- » In FNS service areas in Oklahoma and approved near areas outside participating Indian reservations, Indian Tribal Household status must be verified.
- » Other household information must only be verified if questionable.

Conclusion (continued):

- » During the application process, the certifier must advise the household of its rights and responsibilities, including the household's responsibility to report specific changes in circumstances and its right to request a fair hearing.

- » If a household fails to cooperate in attempts to arrange an interview but the application does not provide sufficient information to make an eligibility determination, the certifier will take no further action.

- » If household fails to provide requested documentation to verify income and/or income deductions within the seven-day processing time frame, but the application appears to contain all necessary financial information and the household appears to be eligible, the certifier will certify the household for one month pending completion of the required verification.

Conclusion (continued):

- » If a household refuses to cooperate, the certifier must deny application at the time of the refusal.

- » The certifier may terminate the application process if an applicant becomes verbally or physically abusive.

- » An applicant may voluntarily withdraw its application verbally or in writing at any time prior to the eligibility determination.

Module 3 Quiz

Instructions:

The following quiz will test your knowledge of FDPIR application processing, interviews, and verification.

1. Which of the following is NOT a step in the FDPIR application process?

- A. Interviewing all members of the applicant household**
- B. Assisting the household in the completion of its application**
- C. Advising the household of its rights and responsibilities.**
- D. Obtaining necessary verifications**

2. True or False? Receiving benefits from both SNAP and FDPIR during the same month is a program violation that must be listed on the application form.

A. True

B. False

3. Which is the correct response? An application is considered complete for filing purposes when it includes the following:

- A. Name and address**
- B. Name and signature**
- C. Name, address, and signature**
- D. Signature**

4. Which of the following is not a method by which a household member or authorized representative can submit an application?

A. In person

B. By mail

C. By phone

D. By email/scan or fax

5. True or False? A household will qualify for expedited service if it reports no income in the current month.

A. True

B. False

6. If a household does not qualify for expedited service but is eligible for FDPIR benefits, when must the ITO/State agency provide them with the opportunity to obtain USDA Foods?

- A. No later than one business day after the application is submitted**
- B. No later than five business days after the application is submitted**
- C. No later than seven business days after the application is submitted**
- D. No later than ten business days after the application is submitted**

7. True or False? If the certifier cannot verify a household's gross non-exempt income within the expedited processing time frame, the certifier cannot expedite the household's certification even if it is in immediate need.

A. True

B. False

8. Where can a certification interview take place?

- A. FDPIR office**
- B. Tailgate site**
- C. By telephone**
- D. The applicant's home**
- E. All of the above**

9. If a household cannot provide the ITO/State agency with appropriate documentary evidence, is the household ineligible to receive FDPIR benefits?

A. Yes

B. No

10. True or False? A household member can be a collateral contact if documentary evidence cannot be obtained.

A. True

B. False

11. The Travis household is not categorically eligible, does not qualify for expedited service, and none of the information on the household's application is questionable. Which of the following is the certifier not required to verify before certifying the household?

- A. Gross non-exempt income**
- B. Expenses to qualify the household for the dependent care deduction**
- C. Expenses to qualify the household for the Medical Expenses income deduction**
- D. Expenses to qualify the household for the child support income deduction**

12. True or False? Certifiers must provide an attachment to the application form that describes the household's rights and responsibilities.

A. True

B. False