**Policy Clarifications
Cash Assistance – All
Medicaid – All
SNAP
PCA-18434-178
PMA-18434-378
PFS-18434-578**

**Submitted: 4/17 Agency: CAOs**

**Subject: No Income Reported at Application and Renewal**

**Question**: If an individual reports no income, does the CAO have to verify “past management” for Medical Assistance (MA), Cash Assistance and Supplemental Nutrition Assistance Program (SNAP) purposes?

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| **Response By: Bureau of Policy** | **Date: 4/11/17** |

No. Verification of “past management” is only necessary if the individual’s reported information is questionable, or if it contradicts known information.

**Reminder:** The “Zero Income Statement” (HSEA 6) is a LIHEAP-specific form approved by headquarters and must NOT be used for anything other than LIHEAP budgets.

CAOs should not use forms that have not been reviewed and approved for use by headquarters. This includes CAO “Management Verification” letters.

 At Application

If an applicant indicates he or she has no income, the CAO must check all available electronic data sources for conflicting information. If electronic data sources show no current income for the individual, the CAO does not need to ask for further information from the applicant, unless the applicant’s statement contradicts CAO records or is questionable. The CAO should process these applications based on $0 income.

To be considered questionable:

* Information on the application must be inconsistent with other information on the application or previous applications.
* Information is inconsistent with information received by the CAO, known in the case record, presented during the interview, or provided from other sources

**Example**: Elizabeth (age 22) lives with her parents and her 2 year old son, Max. Elizabeth applies for SNAP, Cash, and MA for herself and Max. Elizabeth reports no income on her application and electronic data sources do not indicate any current employment or income for Elizabeth. Elizabeth’s parents allow Elizabeth and Max to live in their home rent-free. The CAO does not need to request any income verification from Elizabeth.

If the individual’s statement contradicts CAO records or is questionable, the CAO may ask the individual to verify his or her circumstances. Verification can include requesting a statement from the source of the income used to meet the individual’s needs ([CAH 178.3](http://services.dpw.state.pa.us/oimpolicymanuals/cash/178_Verification/178_3_CAO_Responsibility.htm); [MAEH 378.311](http://services.dpw.state.pa.us/oimpolicymanuals/ma/378_Verification/378_3_County_Assistance_Office_Responsibility.htm); [SNAPH 578.3](http://services.dpw.state.pa.us/oimpolicymanuals/snap/578_Verification_Requirements/578_3_County_Assistance_Office_Responsibility.htm)).

**Example**: Lisa (age 45) applies for SNAP, Cash, and MA for herself and her children, Steve (age 15) and Meg (age 12). Lisa reports on the application that she rents an apartment and that she has no income. Electronic data sources show no current employment or income for Lisa. Lisa indicates that her mother gives her money each month to meet her needs. The CAO must request verification of Lisa’s mother’s name and address, as well as the amount and frequency of the money provided. Verification can be written (e.g. a letter from the source of the income) or verbal (e.g. collateral contact with the source of the income).

**Example**: If, in the example above, Lisa reported an expense of $500 per month in rent and that her mother paid her rent directly to the landlord, the CAO must request verification of this arrangement. Verification can be written or verbal.

**Reminder** – both Cash and SNAP applications require an interview. Discuss any inconsistent income information with the applicant. If there is no contradictory or questionable information reported by the individual or available on electronic data sources at application, eligibility must be reviewed based on $0 income.

At Renewal

For MA:

If an individual is eligible for MA based on $0 income, and there is no contradictory information reported by the individual or available on electronic data sources at renewal, eligibility must be reviewed based on $0 income.

**Example**: Frank (age 37) is open MG91 based on $0. At application, he reported that he lives with his grandmother, who allows him to stay with her rent-free. At renewal, the CAO reviews electronic data sources and finds no current employment or income information for Frank. The CAO must review Frank’s eligibility based on $0.

**Reminder**: An ex parte review must be completed for all MA-only renewals (**Ops Memo 14-12-01**) and when a Cash budget is closed at renewal.

* If a renewal packet is manually scheduled, the CAO must complete an ex parte review before a renewal packet is generated for the recipient.
* If a renewal packet is automatically scheduled, the CAO must complete an ex parte review before taking any action on the case, regardless of whether the packet is returned.

For Cash and SNAP:

Both Cash and SNAP renewals require an interview. If there is no contradictory information reported by the individual or available on electronic data sources at renewal, eligibility must be reviewed based on $0 income.

This clarification obsoletes PFS-17751-578.