

# Policy Clarifications – All

**Cash – PCA-19088-930**  
**SNAP-PFS-19088-930**  
**MA-PMA-19088-930**  
**LIHEAP-PLA-19088-930**  
**LTC-PMN-19088-930**

**Submitted: August 27, 2018**

**Agency: CAOs**

**Subject: Completing the Income Verification Request (PA 162VR) for Data Exchanges 4 and 5**

## **Question:**

1. What fields are IMCWs permitted to complete on the PA 162VR form when requesting verification regarding hits on Exchanges 4 and 5?
2. Can the PA 162VR be submitted as an exhibit at a Bureau of Hearings and Appeals (BHA) hearing for assets or income discovered via Exchanges 4 or 5?
3. If it can be used as an exhibit, how? If not, what are the County Assistance Office's (CAO's) appeal/exhibit procedures at the BHA hearing?

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**Response By: Bureau of Policy**

**Date: 9/6/18**

1. All fields on the PA 162VR should be completed prior to sending it to the client. To safeguard the information, the CAO must NOT refer to the information as being sourced from the IRS or from Exchange 4 or 5. In the 'Source' field of the PA 162VR, the CAO must enter "Electronic Data Source." In the 'Paid By' field, the CAO must enter the name and address of the source or payer of the income. This may be an employer, bank or other sources identified on Exchanges 4 and 5.
2. Yes, if the information on the PA 162VR was sent to the client in a way that safeguarded the information. The CAO can scan the form into Imaging and use it in a hearing. If scanned into Imaging, the PA 162VR must have its own entry. It cannot be comingled with other exhibits, documents, or hearing packets. The

image description should clearly identify the entry as Confidential Federal Tax Information (FTI).

3. The PA 162VR can only be used in a hearing to argue that the client failed to provide verification to the CAO. It cannot be used as proof that an asset exists for eligibility purposes. The source of the information should be described as an “electronic data source.” The CAO should not refer to the information as being sourced from the IRS or from Exchange 4 or 5. Any information received from the client is not FTI, so the CAO may present the information received from the client in the same way as any other exhibit. Whether the client satisfied the verification requirement will be left up to the Administrative Law Judge (ALJ).