

## Policy Clarifications - All

### Cash Assistance – PCA-19818-178 Medical Assistance – PMA-19818-378 SNAP Assistance – PFS-19818-578

Submitted: 03/27/2020

Agency: CAOs

Subject: Verification Requirements

Question: Are verification requirements waived for applicants and recipients during the coronavirus (COVID19) emergency?

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Response By: Division of Family Assistance

Date: 5/22/2020

Verification requirements are not waived, and verification can still be requested as needed. However, if the applicant or recipient is not able to provide needed verification from a third party and the CAO was not able to verify using electronic data sources (using current guidelines for verified upon receipt), or the CAO is not able to secure third party verbal, electronic, or documented verification because the third-party is unavailable due to the COVID-19 emergency, the CAO will use applicant/recipient self-attestation.

**For Cash:** If the applicant/recipient has cooperated but cannot get acceptable evidence, the CAO should work with the individual for collateral contact. Prior to collateral contact, the CAO will get verbal permission to complete collateral contact if a PA 4 is not available in the TANF case record. If efforts of both the individual and the CAO do not produce valid proof, then the CAO must make a reasonable judgment based on available evidence and absent contrary information. The CAO shall accept the client statement as valid based on the reasonableness of other supporting and conflicting evidence. In response to COVID-19, the CAO will accept self-attestation for earned income loss or reduction, school enrollment, and compliance with criminal history if the clerk of courts is closed until the next eligibility review. (CAH 178.31, 178.311)

**For SNAP:** Food and Nutrition Service (FNS) has provided clarification that in the event attempts to verify income have been unsuccessful, CAOs may determine the amount based on the best available information, including using collateral contacts. For SNAP, State and local “Stay at Home”, “Shelter in Place”, or comparable orders may be used as collateral contact to verify an individual has lost their job and thereby experienced a loss of income due to a COVID-19 related business closure. (SNAPH 578.32, 578.34)

**For MA:** If verification is requested and the client does not provide by the date verification was due, the CAO should accept what was reported as verification by self-attestation. If the client reports zero income and data sources report an employer or wages, the CAO should attempt to verify if the employer is open or not (as non-essential businesses are not to be open per the Governor). If contact cannot be made, enter zero income as client statement. For more information regarding verification for MA during the COVID-19 emergency, please see OPS 20-03-02 and 20-03-03.

**NOTE:** For information specific to LTC and HCBS verification, please see PMN 19932-378.