**Policy Clarifications
Cash Assistance – All
Medicaid – All
SNAP
PCA-18433-178
PMA-18433-378
PFS-18433-578**

**Submitted: 04/17 Agency: CAOs**

**Subject: Verification of Terminated Income**

**Question**: We have a client who states that she recently lost a job. What verification of terminated income should we require?

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

Third-party verification of terminated income from work should be required **only** if the verification is necessary to calculate the client’s monthly income to determine eligibility, or for adjusting recent benefits.

If the client states that she has recently stopped working, the CAO may discuss this statement to determine how the client is living and paying bills. The CAO should narrate the client’s explanation. Additional proof is not necessary unless the client’s statement that the job has ended is questionable – that is, incomplete, contradictory, or unclear. A determination that a statement is questionable, and that additional proof is necessary, shall be made based on the individual client’s circumstances. The CAO’s determination that the statement is questionable, and that additional verification has been requested, should be narrated.

**Example:** A client applies for Medical Assistance (MA), SNAP, and TANF. The client states that she was working two months ago, but lost her job due to health problems. The client states that she is behind on her mortgage and facing utility shut-offs due to nonpayment. The caseworker will narrate the client’s explanation and authorize benefits, provided that all other eligibility factors are met.

**Example:** A client applies for MA, SNAP, and TANF. The client requests retroactive MA coverage for a hospital bill from two months ago. The client states that she was working two months ago, but lost her job due to health problems. The caseworker will request the client’s pay stubs or an employer income verification letter to determine countable income for the retroactive MA period.

**Example:** A client completes a SNAP recertification. She submits pay stubs in the amount of $850 per month from Company A. When she completed her SNAP Semi-Annual Report six months ago, she had verified income in the amount of $750 from Company B. At the SNAP interview, the client states that she switched jobs four months ago. The caseworker will narrate the client’s explanation and reauthorize benefits, provided that all other eligibility factors are met.

Proof of terminated income to calculate current monthly income should only be required if current monthly income cannot be reasonably determined from electronic data sources, including TALX and the Unemployment Compensation (UC) Data Exchange.

**Example:** A client applies for MA benefits. She has been receiving SNAP benefits. The client states that she lost her job at the beginning of the month. She states that she just began receiving $300 per week in UC. She provides the only pay stub that she received during the month of application. The UC Data Exchange confirms the client’s UC income. The caseworker will authorize benefits, provided that all other eligibility factors are met, and will recalculate SNAP benefits based on the UC income, effective the following month.

**MAGI-related MA**

If the client is applying for a MAGI related category of MA only, proof of terminated income is not required if the client’s self-reported income and income information obtained electronically through a data source are reasonably compatible. See [MAEH 312.72](http://services.dpw.state.pa.us/oimpolicymanuals/ma/312_ACA/312.7_Verification.htm). The CAO will use the information from the data source as verification of income.

**Reminder:** Self-reported income and income information from an electronic data source are reasonably compatible if they are both at or below the applicable MAGI income standard.

**Example:** A client applies for MA. She states that she lost her job a week ago, and is expecting her last biweekly pay check of $600 in the next week. Electronic data sources show income in the amount of $1,300 per month. Because the client’s self-attested (self-reported) income and her income from electronic data sources are both below the Adult MAGI MA income threshold, the caseworker will authorize benefits provided that all other eligibility factors are met.