

SNAP Outreach and Advocacy

2014 Quick Guide

Introduction

Community Food Advocates is an anti-hunger organization based in Nashville, serving Middle Tennessee. Our mission is to end hunger by creating a healthy, just, and sustainable food system. We are farmers, parents, students, persons of faith, community gardeners, and health advocates united by the idea that all members of our community should have access to food grown in a way that promotes the health of people, planet, and community.

Through our SNAP Outreach and Advocacy program, we partner with the Tennessee Department of Human Services in our work to ensure that families and individuals who might be eligible for SNAP (the Supplemental Nutrition Assistance Program, formerly known as Food Stamps) are aware of and have access to benefits. Each year we connect tens of thousands of Tennesseans with nutrition benefit support and information through literature and presentations – collaborating with neighborhood and community groups, faith-based organizations, and schools. Every week we are present at soup kitchens and other direct service locations, focusing on persons experiencing homelessness, those transitioning back into the community from incarceration, seniors and disabled persons, the working poor (or underemployed), and persons who are immigrants or refugees.

Moreover, we advocate on behalf of clients who have been incorrectly denied benefits. When individuals seeking nutrition assistance feel they are wrongfully denied they may pursue an appeal of that decision, and we strive to provide resources and support. In addition to advocating on an individual level, we work with state administrators to ensure that SNAP is functioning as effectively as possible in Middle Tennessee, and advocate for program changes that increase access to benefits state wide.

For this quick guide we have compiled the foundation elements of SNAP Outreach to assist with applications, change reports and renewals (or recertifications) for our staff, volunteers, partnering organizations, and other service providers. We have also created a full 2014 Best Practices Field Guide, compiling tools and best practices for SNAP Outreach and Advocacy in Middle Tennessee, that also includes basic information about client complaints, case appeals and hearings.

For further assistance or more information, please contact us at SNAP@communityfoodadvocates.org.

Community Food Advocates

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Our offices are located at 604 Gallatin Rd., Suite 211, Nashville, TN 37206.

Visit our website at www.communityfoodadvocates.org.



Community Food Advocates is a 501(c)3 non-profit organization. Our SNAP Outreach Program is funded in part through a contract with the USDA and the Tennessee Department of Human Services (400 Deaderick St, Nashville, TN 37243. 615-313-4700). Community Food Advocates is an equal opportunity provider and employer. Language interpreters are available upon request at no cost to our clients.

SNAP 101: Household Eligibility, Income Requirements, Assets and Allowable Deductions

The Supplemental Nutrition Assistance Program (SNAP) is our nation's largest anti-hunger program. After unemployment insurance, SNAP is the most responsive federal assistance program during periods of economic insecurity. SNAP is funded through the United States Department of Agriculture (USDA), and is administered in the state of Tennessee through the Department of Human Services (DHS). As of March 2014, over 46 million Americans were utilizing this benefit, and over 1.3 million participants are residents of Tennessee. 65% of SNAP participants in Tennessee are families with children, and more than 35% of participants are in households with seniors or persons experiencing disabilities.

A household is defined as the number of people who buy and prepare food together. Household eligibility is determined by a number of factors, including gross and/or net income, financial assets, shelter expenses, medical expenses, dependent care expenses, child support payments, as well as other non-financial factors.

Gross income is defined as a household's total income prior to any deductions, and net income is determined by subtracting allowable deductions. When assisting an individual in the SNAP application process, it can at times be helpful to determine whether or not the applicant is likely to qualify. The eligibility chart below shows the maximum gross and net income per household, per month. **However, seniors and persons with disabilities are eligible for special deductions when calculating net income and are not required to meet the maximum gross income standards.**

Household size	Gross monthly income 130 percent of poverty	Net Monthly Income 100 percent of poverty
1	\$1,265	\$973
2	\$1,705	\$1,311
3	\$2,145	\$1,650
4	\$2,585	\$1,988
5	\$3,024	\$2,326
6	\$3,465	\$2,665
7	\$3,904	\$3,003
8	\$4,344	\$3,341
Each additional member	+440	+339

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The asset limit is \$2,250 for most households and \$3,250 for households containing a member who is disabled or 60+. Assets *not* counted include home and lot, household goods, income producing property, real estate that is for sale, cash value of life insurance, personal property, retirement accounts such as IRA and 401k plans, or vehicles—or the resources of people who receive Supplemental Security Income (SSI), or Temporary Assistance for Needy Families (TANF, formerly AFDC). Countable assets include cash on hand, money in checking and savings accounts, certificates of deposit, stocks, bonds, and lump-sum payments.

These standard financial deductions help determine a household's net income:

- 20% automatic deduction from earned income
- Standard \$152 deduction for households of 1 to 3 people, \$163 for a household size of 4, \$191 for a household of 5, and \$219 for a household of 6 or more (deductions are higher in Alaska, Hawaii, Guam and the Virgin Islands)
- Child/dependent care when necessary for work, training, or education
- Legally owed child support payments
- National homeless shelter cost deduction of \$143
- Tennessee allows shelter costs that are more than half of the household's income after the other deductions, including gas, electric, water, telephone, rent or mortgage, and property taxes on the home

There are special exceptions for seniors (60+) or disabled persons, and households that include them.

Unlike other households, they are only required to meet the *net income* requirements. Generally, a person is considered to be disabled for SNAP purposes if s/he:

- Receives State or Federal payments under the Social Security Act, including *Supplemental Security Income (SSI)* or *Social Security disability or blindness payments*
- Receives a *disability retirement benefit* from a governmental agency because of a disability considered permanent under the Social Security Act
- Receives an annuity under the Railroad Retirement Act, and is eligible for Medicare *or* is considered to be disabled based on the SSI rules
- Is a veteran who is totally disabled, permanently housebound, or in need of regular aid and attendance
- Is a surviving spouse or child of a veteran who is receiving VA benefits and is considered to be permanently disabled

Households with a senior or disabled member are only subject to the net monthly income requirements and therefore should not be screened based on gross income.

This net income is determined differently for households with senior or disabled members as there special deductions permitted for the following:

- most medical and dental expenses, such as doctors' bills, prescription drugs and over-the-counter medication when approved by a doctor, including dentures;
- inpatient and outpatient hospital expenses and nursing care, attendant care;
- health insurance premiums; and
- certain transportation costs in rural or remote areas.

Anyone who meets the eligibility requirements can receive federal SNAP benefits, with final determination of eligibility applications administered through state agencies. If an applicant does not speak English well and requires an interpreter, DHS will provide an interpreter upon request. Applicants/recipients may also bring their own translator.

Children may be eligible to receive SNAP, even as members of a household where adults are ineligible.

Though some documented immigrants are ineligible for food stamp benefits, dependants of an ineligible immigrant are often still eligible. Any and all adult household members are not considered eligible if they are:

- A fleeing felon;
- A parole or probation violator; or
- Guilty of a drug-related felony that was committed after August 22, 1996, unless that have completed an acceptable drug treatment course or can show proof of current enrollment.

Citizenship Eligibility Requirements

The 2002 Farm Bill restored SNAP eligibility to most documented immigrants that 1) have lived in the country for 5 years, 2) are receiving assistance or benefits for a disability, or 3) are children under 18.

Children qualify for assistance based on the income and resources of the household in which they live. Eligible household members can receive benefits even if there are *non-qualifying* household members.

All SNAP applicants must have a social security number, or proof for having applied for one.

Certain non-citizens such as those admitted for humanitarian reasons and those admitted for permanent residence may also be eligible for the program. Non-citizens that are in the U.S. temporarily, such as students, are not eligible.

Parents who apply for SNAP on behalf of a child born in the U.S. are not required to answer questions about their own immigration status or to provide their own social security number, nor is the office allowed to contact U.S. Citizenship and Immigration Services to determine the parents' immigration status.

However, parents are required to show proof of income and resources as well as other information that may help prove the child's eligibility. If parents cannot provide proof of income and other information, they may provide a signed letter from an employer or collateral contact.

Work Requirements

With some exceptions, able-bodied adults between ages 16 and 60 must seek *and* accept suitable employment or participate in job training and placement from a local agency referral. Failure to meet work requirements can result in disqualification for assistance.

Able-bodied adults without dependants (ABAWD) ages 18-50 are generally able to receive SNAP benefits for a maximum of 3 months in a three year period if they are unemployed. This means that unless an ABAWD applicant is working, going through job training, or actively attempting employment, his/her ability to draw benefits will be limited. No such time limits apply to those meeting the work requirements.

Application Steps

To apply for SNAP, the first step is to fill out a Family Assistance Application from the Tennessee Department of Human Services (DHS). This document can be completed by the applicant, or by an authorized representative or legal guardian. Applications can be requested through any DHS office, or by phone from the TN DHS Family Service Center 1-866-311-4287.

While eligibility information is required for an application to be approved, an incomplete application can be filed as long as it contains the following information:

- Applicant's name
- Applicant's residential or mailing address
- The signature of either the applicant, legal guardian, or an authorized representative

However, incomplete applications can prevent expedited services from being offered. When assisting an individual with a SNAP application, first help them determine his/her household size (the number of people who buy and prepare food together) and encourage the inclusion of as much of the following information as possible from the applicant:

- Name and address
- Contact phone numbers
- The name, social security number, citizenship, marital status and birth date of each household member
- Name of Authorized Representative (only if applicable)
- Name and phone numbers of individuals who can speak on behalf of the applicant (only as needed, such as in the case of an unstable or complicated situation)
- Household resources
- Household income
- Federal and/or State Convictions
- Childcare costs
- Shelter costs
- Recurring medical expenses for seniors or disabled household members
- Child support payments made (not received, this is entered under household income)
- Date and signature

Submission

All applications must be submitted to the TN DHS office in the county of residence for those applying.

Applications can be submitted by fax, mail, or in person. *Including a copy of a photo ID for the primary applicant is strongly recommended to facilitate timely processing.*

Individuals and households that require emergency or expedited services, or who do not have a regular telephone number, should be advised to apply in person.

The date an application is submitted is considered the *application file date* and includes holidays and weekends. It can be recommended that individuals submit applications by FAX or via certified mail to avoid lines and to ensure that applicants have proof of submission. When applying in person, applicants are encouraged to request and save his/her application submission receipt in the unfortunate case that an application is lost or delayed.

Once an application is filed, the county office must conduct a face-to-face interview and verify eligibility within 30 days – a letter will be sent to the applicant regarding scheduling. If an individual fails to attend a scheduled interview for an initial application or for recertification, the applicant will receive a Notice of Missed Appointment. If no attempt is made to reschedule the missed appointment, the certification will be allowed to expire or the application will be denied at the end of the 30-day period. The applicant will then have to begin the application process anew. Benefits can be lost when SNAP recipients fail to complete the SNAP recertification requirements.

Emergency SNAP Benefits

Households may be eligible for expedited benefits if they have very low income or resources. Individuals that qualify for emergency assistance are only required to show proof of identification to receive the first month of benefits. If no identification is available, a collateral contact may be used. Assigning a *collateral contact* means giving DHS permission to call or write to a third party – such as an employer or other agency – to verify information. *If emergency assistance is required, applicants are strongly encouraged to apply in person.* When an application is approved, benefits will start from the application file date.

To determine whether someone is eligible for expedited services, they must meet at least one of the eligibility criteria listed below:

1. The monthly household income is less than \$150, and household resources are less than \$100;
2. Household shelter costs (including utilities) are higher than household monthly income plus savings;
3. Or, the applicant is a seasonal or migrant farm worker.

Authorized Representative and Office Visit Waivers

Some applicants, particularly senior or disabled individuals, may be eligible for a phone interview instead of an in-person interview. An applicant unable to attend the office interview may designate in writing someone who knows the circumstances of the applicant to attend on his/her behalf, also known as an “authorized representative.”

The office interview shall be waived upon request by any household which is unable to appoint an authorized representative and which has no household members able to come into the DHS office, because they are 65 years of age or older, or are mentally or physically handicapped –or if requested by any household which is unable to appoint an authorized representative and lives in a location which is not served by a certification office.

Answers to Frequently Asked Questions

For a list of DHS offices in Tennessee visit http://www.tn.gov/humanserv/st_map.html.

Families First (the State of Tennessee program name for TANF) applicants who are also applying for SNAP will go through a single interview for both programs. Individuals receiving SSI, cash assistance, a First Wheels Loan or Family Services Counseling may be categorically eligible for SNAP benefits.

The county shall waive the office interview for any household which is unable to appoint an authorized representative and which has no household members able to come to the DHS office, because of transportation difficulties or similar hardships conditions. These conditions include, but are not limited to: illness, care of a household member, prolonged severe weather, and hardships associated with living in a rural area, and/or employment or job training, which the county determines warrants a waiver of the office interview. The county determines this on a case by case basis.

Applications may be voluntarily withdrawn at any time prior to determination of eligibility. If a withdrawal occurs, DHS must contact the household to confirm that the withdrawal was intentional.

Students enrolled in an institution of higher education, defined as any school, college or institute which requires a high school diploma or G.E.D. for admission or enrollment, may be eligible to participate in SNAP if they meet one of the following criteria: is enrolled in school more than half time; is receiving (any amount of) federal or state work-study monies; is employed for pay, for 20 hours or more per week; or, is caring for a child under the age of 12 (further rules apply).

Homeless individuals are required to verify their identities, as are all applicants; however, if a photo ID is inaccessible for an individual, caseworkers may use other forms of documentary evidence to verify an applicant's identity—such as wage stubs, an ID from another government program, or a collateral contact. A homeless person cannot be denied benefits because they lack a permanent address. A mailing address is requested, and if no address or phone number can be supplied, the individual must apply in person at the DHS office in his/her county of residence to ensure adequate communication. Homelessness is also considered a barrier to employment, therefore the work requirements of most able-bodied adults do not automatically apply to homeless applicants.

Residents of shelters for battered women and children are exempt from the policy that prohibits individuals from receiving benefits as a member of more than one household, county, or state within the same month. However, they are limited to a one month certification period. Any resident of a shelter for battered women and children should be certified separate from a spouse, partner, family member, etc. residing in their *former household*. The household applying should be certified according to their current situation and without regard to the income, resources, and expenses of their former household and should consider resources held jointly with members of the former household as inaccessible resources. When determining deductions, only expenses for which the applicant is currently responsible can be considered.

Many people wrongly believe that immigrants who apply for and/or receive government support will be considered a "public charge." Though the U.S. government can refuse an individual entrance, re-entrance, citizenship or other legal residential statuses if it believes that the individual is likely to become a public charge, the U.S. government is not allowed to treat an individual as a "public charge" for receiving non-cash benefits such as food stamps. Visit the USDA Food and Nutrition Services website for more information about the reception of SNAP benefits NOT being a "public charge." <http://www.fns.usda.gov/snap/nutrition-benefits-and-public-charge-effect-immigration-status>.

Any previously incarcerated individual may apply for SNAP benefits. Individuals convicted under federal or state law of a felony offense which occurred after August 22, 1996 and which involved the possession, use, or distribution of a controlled substance must receive or intend to receive substance abuse treatment before they can become eligible to apply for SNAP. A substance abuse treatment program approved by DHS is licensed by the TN Department of Health. A list of such programs may be found on their website: www.state.tn.us/health.

In order for DHS to process a SNAP application, all members of the household must provide proof of eligibility *during the initial 30 day period*. Copies of these documents can be submitted by mail, by fax, or in-person. The sooner these documents are received, the sooner eligibility can be determined.

An individual residing in Tennessee *can* apply with an out-of-state photo ID, as long as they do not maintain an open SNAP case in their former state of residence.

Once a household has been approved for SNAP, an Electronic Benefits Transfer (EBT) card will be issued and sent to the household mailing address. Every month the benefits allotted will be transferred to this card, which acts like a debit card, to buy groceries at stores authorized to take SNAP. The customer swipes the card in a Point of Sale device (POS) and enters a four-digit Personal Identification Number (PIN). All transactions are electronically processed and recorded, and the USDA has access to records of all transactions. Any benefits that clients have remaining in their EBT account at the end of the month will be carried over to the next month, and can be used throughout the current certification period. SNAP benefits are used for food only. To see who is authorized to accept SNAP visit: <http://www.fns.usda.gov/snap/retailerlocator>.

SNAP is a Federal benefit program so an EBT card issued in one state will work in another. EBT Customer Service Information: call 1-888-997-9444 or visit www.ebtedge.com.

In most cases, benefit recertification occurs every six months for individuals who are able or likely to find employment and every twelve months for individuals who are less likely to find employment (e.g. children, seniors, disabled, etc.) The Department of Human Services will mail notices for recertification and reporting to each household prior to the last month of the household's certification period. All correspondence mailed by the applicant's DHS caseworker will be dated and will show clear deadlines for form submission. This mailing will include the required forms for reporting information, e.g. Renewal Applications, Simplified Reporting Forms, and a postage-paid envelope addressed to the DHS office.

When an application is received after the end of the certification period, the household's benefits may be prorated. However, if an individual can show good cause for a late application, lost benefits may be restored. Mid-year recertification interviews are typically done by phone, but may be done in person if desired. Applicants that fail to complete all of the application or recertification requirements, without waivers for missed interviews or missing verification information, must reapply for food stamps.

All changes in eligibility requirements that are subject to verification at the time of the initial application should be reported. However, caseworkers only actively verify income, resources, personal loans, and medical expenses at the time of recertification.

If a household's monthly income exceeds required limits for his/her household size, or if an individual household member's total resources exceed the limit, this must be reported by the 10th day of the month following the increase in income. If the applicant is an employed able-bodied adult without dependants, the applicant must report the reduction of hours worked below 20 per week.

When individuals fail to report changes, charges of food stamp over-issuance or even fraud can occur. If the over-issuance is unintended, it will be considered a non-fraud, or "inadvertent household error." Over-issuances may be calculated by simply subtracting the amount of benefits that should have been received from the amount actually (or wrongly) received. Households that do not report a new job or increased earnings may be charged an additional penalty.

If an applicant refuses to cooperate with DHS in the process of determining eligibility, the application will be denied at the time of refusal. Most benefit cancellations are a result of incomplete verification information at the time of recertification. If an applicant fails to submit information on time, his/her assistance will be discontinued and s/he must reapply for SNAP. If an applicant believes that s/he was incorrectly denied benefits or the appropriate benefit amount, they can file an appeal.