Advocacy Tips: The Basics on Food Stamp/SNAP Expedited Benefits

Under federal food stamp/SNAP law, a household that qualifies for "expedited" food stamps gets the benefits are provided *within 7 days* of application for FS/SNAP. This means the household gets the plastic EBT card in hand, with benefits loaded on the card ready for food shopping within 7 days of the application. Here are some advocacy reminders on the FS/SNAP expedited rules with citations to DTA's regulations and relevant procedures.

Who qualifies for expedited?

Expedited criteria are found at 106 CMR 365.810. A household must meet any one of the following conditions:

- Household income is less than \$150 and liquid assets less than \$100,
- Household income <u>and</u> liquid assets are *less than* shelter costs (rent/home ownership plus the relevant Standard Utility Allowance, see below), *OR*
- Household is migrant (farm worker) household.

What proofs are needed for expedited?

An applicant needs to verify the *identity* of the *head of household*. This is the only verification required for expedited. 106 CMR 365.830. The applicant does not need to verify income, expenses, the identity of other members of the household or other eligibility factors. To prove identity -

- DTA can accept any one of a wide range of documents including a photo ID, birth certificate, work or school ID, wage stub, health care benefit, statement from a social services agency, other documentary evidence or collateral contact. DTA cannot demand a specific item, like a birth certificate or driver license. 106 CMR 361.610(G).
- DTA also verifies identity by confirming the applicant's SSN through the SVES electronic inquiry SSN validation process. (See May 2007 FYI, DTA Transitions Magazine).

Do assets count for expedited?

Even though there is no asset test for regular benefits, the expedited FS/SNAP rules do require a household to provide information on available "liquid" assets:

- Liquid assets include money in the bank, liquid securities, IRAs, certain Keough plans, etc. See 106 CMR 363.100
- Assets that cannot *be readily converted into cash* within the expedited eligibility period are *not* counted. For example, jointly held assets that require cooperation of a third party, and assets in court proceedings, real estate.
- A household's money should be considered <u>either</u> income or assets, but not both.

Example: A low wage worker deposited his or her paycheck in the bank, along with other assets. The paycheck should be considered as income for the month of application and not asset. It's important to ensure that the same source of money is not double counted when determining expedited eligibility.

• A household need *not* provide verification of assets for expedited. The amount of assets is asked on the application or during the DTA screening interview.

How does DTA determine "shelter costs" for expedited benefits?

A household qualifies for expedited FS/SNAP benefits when the household's combined income and liquid assets is *less than* the household shelter costs.

• Shelter costs are calculated by adding together household rent or mortgage/ homeownership costs <u>plus</u> the appropriate heating/cooling SUA for the household. 106 CMR 365.810(C). Most households should qualify for the \$586 Heating/Cooling standard utility allowance (SUA) unless the household has NO separate heating or cooling (AC) costs and has not received/applied for fuel assistance.

Example: A household has \$900 in available income and \$200 assets in the month of application, totaling \$1,100 in combined income/assets. The household reports it pays \$700 in rent, and pays heating and cooling costs separate. The household's shelter costs are \$700 plus \$586 SUA, totaling \$1,286 for the month. The household is eligible for expedited benefits.

 Be sure to check all homeownership costs. Some newly unemployed households may have substantial mortgage debt as well as other homeownership costs as their resources dwindle. Homeownership costs include not just the primary mortgage, but any second mortgage on the property, homeowners insurance, real estate taxes, home repair costs, condo fees, etc.

Who is part of a SNAP "household"?

Unlike the FS/SNAP program, certain government benefits, such as Unemployment Insurance (UI), do not ask about the presence or income of spouses or other household members.

- UI benefits are based on an individual's past earnings record and current
 unemployment. Different rules can be confusing for households first applying for
 FS/SNAP benefits. Sometimes a former UI claimant who has run out of benefits
 may not be eligible for expedited if other household members have countable
 income or assets.
- FS/SNAP rules look at the "household" of persons living together to determine eligibility. An FS/SNAP applicant must provide information on his or her spouse and children (under age 22 who) are living in the household. The applicant must also includes any other persons who "purchase and prepare" most of their food (e.g. more than half) with the applicant even if unrelated. 106 CMR 361.200.

How long do expedited FS/SNAP benefits last?

Most households will get expedited benefits for 30 – 45 days while DTA processes the regular FS/SNAP application. If the applicant has provided all required verifications for ongoing benefits within 30 days of application, the household should *continue* on regular benefits without interruption if otherwise eligible. 106 CMR 365.850 (A), (B). A household that has cooperated with giving required verifications and an interview should *never* be required to reapply for FS/SNAP benefits after the expedited benefits period.

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