



Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Transitional Assistance
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Field Operations Memo 2010-29
June 16, 2010

To: Transitional Assistance Office Staff
From:  John Augeri, Assistant Commissioner for Field Operations
Re: SNAP: Self-Declaration of Shelter and Utility Expenses

Overview

To further streamline the application and verification processes, the Department now considers a self-declaration to be sufficient verification of shelter and utility expenses for most NPA SNAP and SSI only households. Effective with the issuance of this Field Operations Memo, no other verification of shelter or utility expenses is needed unless the information provided appears to be questionable or contradictory (see 106 CMR 361.620).

Recent Quality Control error analyses indicate that very few errors are related solely to the shelter deduction. Since the shelter deduction is capped for most households, variances in shelter expenses often make no difference in the calculation of the benefit amount. Additionally, initiatives such as H-EAT and the Standard Medical Deduction have maximized benefits for many households, also with little or no error impact if a shelter expense is not accurate.

Clients who receive TAFDC benefits are still required to verify shelter costs in order for the Department to determine eligibility for the \$40.00 rental allowance.

Purpose of the Memo

This memo provides guidance to case managers about:

- when a self-declaration of shelter/utility expenses is acceptable;
 - when further verification may be necessary; and
 - how to process these cases in BEACON.
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Shelter Deduction

SNAP policy at 106 CMR 364.400 allows for the deduction of monthly shelter and utility costs in excess of 50 percent of the household's income after all other deductions have been applied. This limit on the shelter deduction amount does not apply if the household contains a member who is elderly or disabled in accordance with 106 CMR 361.210. Verification of shelter and utility costs is considered optional and will continue to be optional. However, as of the issuance of this memo, any signed and dated communication from a client - including an application, recertification or change report form - that indicates the cost of shelter and utilities incurred by the household is acceptable verification of those costs.

Additional verification will be required only if the information provided by the household appears contradictory to prior statements made by the household or if information on the application is inconsistent with the statements made by the client during the interview.

Case Manager Responsibilities

During the application or recertification interview, case managers must continue to ask clients about shelter and utility expenses and to explore the possibility that the household:

- has moved or had a change in shelter expenses;
- lives in subsidized or public housing;
- lives in a shared housing situation and receives partial payment of the shelter amount;
- reported shelter amounts that contain arrearages;
- receives roomer or rental income from other non-household members;
- pays a rental amount that includes utilities; or
- has home ownership costs, such as insurance, real estate taxes or condominium fees, even if the household has no mortgage costs.

Also, if the household's income is less than claimed expenses, the case manager must ask follow-up questions to determine if additional verification of shelter/utility expenses is required.

Example: A household is responsible for a rent of \$500 but currently has no income. The client states that she has not been able to pay the rent and is in arrears or has borrowed heavily on her credit card. No additional verification is required, but the case manager must annotate the Narratives tab with the client's response.

Example: A client who lives in public housing now claims the monthly rent has increased significantly but reports no change of address or change of income. The case manager must request additional verification because public housing rents are typically based on the household's income and an increase in rent most likely indicates an increase in the household's income.

**Case Manager
Responsibilities
(continued)**

If additional verification is required, acceptable verifications include but are not limited to: a current rent receipt, a current lease agreement, a cancelled check or money order, a current mortgage, tax or homeowners insurance statement and the Department's landlord and shared housing verification forms.

Note: Case managers are reminded that residency must be verified in accordance with 106 CMR.362.120, and that one of the above documents may be needed for verification of this requirement.

**BEACON
Procedures**

When processing cases with self-declared shelter/utility expenses, case managers must access the Verifications tab in BEACON, select *Other* as the verification of shelter or utility expenses and type "Self-declaration" in the *Other* field. Also, annotate the Narratives tab to indicate that a self-declaration was used as a verification of shelter/utility costs.

Reminder: When entering shelter expense records in BEACON, it is important that the shelter costs be attributed to the household member who incurs the cost. In some situations, more than one household member may be paying shelter expenses (for example, a teen parent in the parent's TAFDC case).

Department forms, brochures and other documentation will be updated in the future to reflect this change. TAOs will be notified of those updates as they occur.

Questions

If you have any questions, please have your Hotline designee call the Policy Hotline.
