

1.4 SNAP APPLICATION PROCESS

This Section describes the process for determining initial and ongoing eligibility for the SNAP Program.

A. APPLICATION FORMS

Applications may be submitted using the DFA-2, **DFA-SNAP-1** or inROADS. See Section 1.2 for the inROADS process.

Usually an application form is required to reapply for SNAP benefits. However, there are times when an AG may reapply without completing a new form. See Section 1.3 for reopening benefits during a certification period.

- If an applicant AG fails to provide the verifications requested on the DFA-6 or verification checklist within the specified time limit and the application is denied, the AG must be given an opportunity to have its eligibility established for up to 60 days from the date of application without completion of a new form.

If the client brings in the verifications before the 60-day period has expired, the Worker determines the AG's eligibility based on the original application, noting in Case Comments any changes which have occurred since the form was completed. If the application is approved, SNAP benefits are not retroactive to the date of application because the approval delay was the fault of the client. Benefits are issued from the date the client provides the verification. The Worker provides benefits using information reported during the original application and any other pertinent information provided prior to approval.

EXAMPLE: An application for SNAP benefits was made on November 1st. A DFA-6 was issued requesting verification of income by November 30th. The verification was not provided by this date and the application was denied. The client brought in the requested information on December 5th. No new application form is required since the client reapplied within 60 days of the date of application. However, if the client is eligible, SNAP benefits are issued from December 5th.

- Different procedures apply when the case is closed because of failure to provide needed verification at the time of redetermination. When the client provides the verification within 30 days of the end of the certification period, it is still considered a redetermination and a new application is

Application/Redetermination Process

- A SNAP AG can be reinstated from the date the household provides the information and or necessary verification without a new application when they meet the following conditions:
 - The SNAP benefits must be in closed status,
 - The SNAP AG has at least one full month remaining in the certification period after the last month benefits are received,
 - The SNAP AG must report and verify a change in circumstances during the 30 days following the last month benefits are received, and
 - The SNAP AG must be eligible for SNAP benefits during the reinstatement month and the remaining months of the certification period.

B. COMPLETE APPLICATION

When the applicant signs a DFA-2 or DFA-SNAP-1 which contains, at a minimum, his name and address, his application is complete, and must be acted upon. When the applicant submits his application by inROADS, the application is considered complete when the application is signed electronically or signed signature page is received. An interview must be scheduled. See Sections 1.2 and 1.4 for mail-in and Special Considerations of this Section inROADS applications. See Section D, Interview Required, below.

NOTE: The DFA-5 is used only in conjunction with an application completed in RAPIDS when the DFA-2 cannot be printed for signature. Completion of the form, with no corresponding application in RAPIDS, does not protect the date of application.

An application is considered incomplete when the applicant chooses not to sign the DFA-2, DFA-SNAP-1 or when no signed signature page or electronic signature is received for an inROADS application. When this occurs, it is a withdrawal and appropriate data system action and client notification must be completed. The recording in Case Comments must specify that the client did not want to sign the application and the reason for his decision. The client should always be encouraged to sign the application to avoid a misunderstanding that he was denied the right to apply.

When the applicant chooses to leave or end the interview before it is complete and does not indicate to the Worker that he wants to withdraw his application, it is considered a withdrawal and appropriate action is taken.

C. DATE OF APPLICATION

The date of application is the date the applicant submits a DFA-2 or DFA-SNAP-1, in person, by fax or other electronic transmission or by mail, which contains, at a minimum, his name and address and signature. When the application is submitted by mail or fax, the date of application is the date that the form with the name, address and signature is received in the local office.

NOTE: When a faxed or other electronic transmission copy of an application is received that contains a minimum of the applicant's name, address and signature, it is considered an original application and no additional signature is required to protect their application date.

When the application is submitted by inROADS, the date of application is the date the application is electronically signed or the signature page is received. These forms must be date-stamped when received.

NOTE: When the applicant has completed an in-office interview and there is a technical failure that prevents printing the DFA-2, Form DFA-5 must be signed by the applicant. Form DFA-RR-1 must also be completed and signed. He must not be required to return to the office to sign the DFA-2 when a DFA-5 has been signed. However, completion of a DFA-5 alone, without a corresponding application in RAPIDS, does not protect the date of application.

When a new DFA-2 or DFA-SNAP-1 is not required, the date of application depends on the situation. See **Application Forms** above.

D. INTERVIEW REQUIRED

An interview is required when an application form is required. See Application Forms above and Section 1.3 for situations when an application form is not required. See **Who Must Be Interviewed** below about authorized representatives.

All individuals who apply for SNAP benefits using any method, are interviewed by phone unless the individual chooses to be interviewed face to face.

When an interview is completed by phone, an application form is still required. If the client submits an application form with only a name, address, and signature to protect their application date, the customer must provide another signature attesting the information provided during the phone interview is accurate.

If the client provided enough information to determine eligibility but the Worker discovers discrepancies or additional information from the interview, it is not necessary to send the client another application for signature. Instead the Worker documents in the case record the differences.

EXAMPLE: An application is received providing income, household composition, and utility amounts. During the interview, the Worker discovers there is a rent obligation. It is not necessary to require another signature or updated application.

When a SNAP application is submitted using inROADS, the Worker must schedule an interview with the client after the application is signed electronically or the signed signature page is received. If the applicant keeps the appointment for the interview, procedures for the intake interview and application processing apply. See Special Considerations in this section for procedures for missed interview appointments.

Waiver of a face-to-face interview does not affect the length of the assigned certification period.

E. WHO MUST BE INTERVIEWED

The identity of the applicant AG member and/or authorized representative must be verified and documented in the case record prior to benefit approval.

1. AG Member

Any adult member of the AG may be interviewed and sign the DFA-2 or **DFA-SNAP-1**. If there is no member of the AG age 18 or over, any member may apply.

The applicant may bring any person he chooses to the interview. This person may participate in the interview only to the extent the applicant wishes. The AG must be informed that it is responsible for repayment of any overissuance caused by erroneous information provided by this person.

2. Authorized Representative

An adult non-AG member may participate in the interview as an authorized representative of the AG, either with or without an AG member. This individual must be authorized and designated in writing by an adult member of the AG or by any AG member if there is no member at least age 18. The authorized representative must have sufficient knowledge of the AG's circumstances to provide the necessary information. The authorized representative may act on the AG's behalf in making an application, completing a redetermination or reporting information during the certification period. See Section 2.2 for reported changes.

Different individuals may be selected for each activity which requires an authorized representative, i.e., one person may complete an application

- The first card must be activated prior to use.
- When the benefits will be available in the account

NOTE: The Worker must determine if there is an existing EBT account and reactivate expunged accounts. He must also inform the client of the availability date of any balance remaining in the account.

- The importance of choosing an authorized cardholder who can also access the EBT account

NOTE: For EBT, the AG may have an authorized cardholder to spend benefits from the AG's EBT account. There is not a separate case or EBT account, but the authorized cardholder has a separate EBT card with his own Personal Identification Number (PIN) and uses the card to spend benefits from the AG's EBT account in the same manner as the AG's payee. The authorized cardholder, authorized representative and the information provider may be the same or different individuals, at the discretion of the AG's payee. See **Who Must Be Interviewed above or The Benefit below** in this Section.

- Services which are available by calling the EBT Helpline and using either the Interactive Voice Response Unit (IVRU) or speaking with a Customer Service Representative (CSR). These services include, but are not limited to, activation of a new card, deactivating a lost/stolen/damaged EBT card, obtaining a new or different PIN, cancellation of an authorized cardholder or checking an account balance.

H. DUE DATE OF ADDITIONAL INFORMATION

Additional information is due 30 days from the date of the DFA-6 or verification checklist.

I. AGENCY TIME LIMITS

Data system action must be taken and, if eligible, the client must receive his first SNAP benefits within 30 days of the date of application, unless Expedited Service applies. See **Expedited Processing below**. The Worker must take action to approve all eligible applications as soon as possible. When the application must be denied because the client has not responded to an DFA-6 or verification checklist within 30 days, the Worker must wait until the 30th day to deny the application.

J. AGENCY DELAYS

If, because of an agency error, an application has not been acted on within the required time limit, corrective action must be taken immediately.

It is a requirement that the DFA-6 or verification checklist be given to applicants no later than 30 days after the date of application, if one is required. If the agency failed to request the necessary verification, the Worker must immediately send an DFA-6 or verification checklist to the applicant and note that the application is pending. When the information is received, benefits are retroactive to the date of application.

If the agency failed to act promptly on the information already received, benefits are retroactive to the date eligibility would have been established had the agency acted in a timely manner. See Section 6.2 for notification requirements.

EXAMPLE: Application was made November 2. The pending information was received November 17, but the Worker overlooked the application until December 17. It was processed on December 17 when the Worker discovered the error. The client was found eligible. The client is issued benefits retroactive to November 2.

K. PAYEE

The term payee identifies the person to whom benefits are issued.

For EBT purposes, certain information about the RAPIDS primary person is sent automatically to the EBT vendor in what is called a demographic record. This information is used to set up the EBT account, mail the EBT card and to identify the payee and authorized cardholders for security card replacement procedures. The card is sent to the primary person. A primary person who is not a payee can be issued an EBT card as an authorized cardholder, if so designated by the payee. See [The Benefit below](#).

L. REPAYMENT AND PENALTIES

1. Repayment

When there is an outstanding claim, RAPIDS automatically initiates repayment upon approval. See Chapter 20.

2. Penalties

Individuals who have not complied with a SNAP work requirement may be ineligible for a specified time. The Worker must determine if any AG member is still subject to a penalty. See Chapter 13.

1. Establishing The Certification Period

The redetermination schedule is based on the following guidelines:

- One Month: Expedited Service cases which apply prior to the 16th of the month and do not provide the necessary verifications prior to approval. If verifications are provided within the time limit given, the certification period is extended an additional 5 or 23 months based on the AG's reporting requirements.
- 2 Months: AG's eligible for Expedited Service who apply on or after the 16th of the month and have verification postponed. See **Combined Issuance below**. If verifications are provided within the time limit given, the certification period is extended an additional 4 or 22 months, based on the AG's composition and income.
- 6 Months: All AG's except those described below for 24 months.
- 24 Months: All AG's in which there is no earned income or only excluded earned income and all adult AG members are:
 - At least age 60, and/or
 - Disabled

NOTE: These AG's may include individuals under age 18 as long as all adults are disabled and/or elderly.

A contact must also be made every 12 months however no interview is required for the 12 month contact. The DFA-SNAP-12, is automatically mailed to the AG by RAPIDS. The client may choose to complete the DFA-SNAP-12 and return it by mail, complete the form through inroads, or they may complete the contact by calling their Worker in the local office or the Customer Service Center.

When the client chooses to complete the contact review by phone the client is not required to return the DFA-SNAP-12. The contact review is considered complete when the Worker records the results of the phone interview and indicates any necessary verification has been received.

The 24-month redetermination is completed by using CSLE. The form is automatically mailed to the AG by RAPIDS. An interview is required for redetermination by phone unless the AG requests a face-to-face interview. See Section 2.2 for the 12- and 24-month procedures.

EXAMPLE: Mr. B applies for SNAP benefits on May 1 and is found eligible for Expedited Service. He is certified for one month only and verification is postponed. He reapplies on May 12 for June. He provides all verification that was postponed from the previous expedited certification. He has \$0 income and is eligible beginning in June. He qualifies for Expedited Service because he provided the postponed verification from the previous expedited certification.

2. Screening For Expedited Service

Every applicant must be screened on the date of application for eligibility for Expedited Service whether or not the applicant requests this service.

In addition, an Expedited Service eligibility decision must be made on the date of application.

If, for any reason, an AG is not identified on the date of application as being eligible for Expedited Service, or is not eligible at that time, and the Worker subsequently discovers that the AG is entitled, the Worker provides Expedited Service as if entitlement had been established on the date of application. However, the time limits are calculated from the date the Worker discovers the entitlement, not from the date of application.

AG's requesting, but not entitled to Expedited Service, have their applications processed according to normal standards. See Section 6.2 for notification requirements.

The DFA-2, **DFA-SNAP-1** or the case record must show that the application was screened for Expedited Service and the justification for the Worker's decision at application. Any changes in the original decision documented in the case record.

3. Variations In Usual Procedures

AG's which qualify for Expedited Service are entitled to receive faster service. To ensure faster service, some exceptions to standard procedures apply.

a. Verification/Work Requirements

Only verification of identity is required prior to approval. Verification of eligibility requirements is temporarily waived, unless it can occur within the Expedited Service time frame. This does not mean that eligibility requirements are waived prior to approval, only that the

2. Mail-In SNAP Applications

If the client calls to request an application be mailed to him, the Worker must screen the client for Expedited Service over the telephone and advise him of his potential eligibility.

The Worker schedules an interview no later than 5 working days after the DFA-2 or DFA-SNAP-1 is received. The interview can be scheduled by telephone or by letter.

If the applicant keeps the appointment for the interview, procedures for the intake interview and application processing apply. See **Procedures for Missed Scheduled Interviews** below.

3. Categorical Eligibility

Categorical Eligibility may be determined at any time as long as the eligibility requirements are met.

a. Who is Eligible

(1) Mixed AG's

When an AG has at least one member who is authorized to receive benefits from TANF-funded programs or is authorized to receive information and referral services about TANF and other department programs, the AG is categorically eligible. Authorized to receive means the AG is coded in the data system as active for a benefit whether they are receiving it or not. Those authorized to receive include individuals who have been determined eligible for benefits and notified of the determination, even if benefits have not been received or accessed or the benefits have been suspended, recouped or not paid because they are less than a minimum amount or they have not yet received the information or referral.

EXAMPLE: A WV WORKS case was closed 5 months ago but is still enrolled in WP as the AG is still eligible for support service payments. The AG last received a payment 4 months ago, but is still categorically eligible.

EXAMPLE: A WV WORKS case is closed for the third sanction in June. In July, the AG applies for WVSCA and is eligible. The AG is categorically eligible from July through October, when the clothing vouchers expire.

- The Worker must not deny an AG that could be categorically eligible until the 30th day to determine if the AG is eligible to receive a TANF-funded benefit.

This applies to AG's that:

- Have an application for TANF-funded benefits pending; and
- Are denied SNAP benefits; and
- Are later determined eligible for TANF-funded benefits; and
- Are otherwise categorically eligible.

The Worker must provide benefits using the original application and any information supplied later. Benefits are issued from the date for which TANF-funded benefit eligibility is established or the date of the original SNAP application, whichever is later. The client cannot be required to complete a new DFA-2, **DFA-SNAP-1** or another interview. The Worker may contact the client to update the DFA-2 or **DFA-SNAP-1** information by mail or by telephone.

(2) SSI Applicants

Persons who apply for SSI and SNAP benefits at the same time have SNAP eligibility determined as any other AG until Categorical Eligibility is met.

SSI applicants who are denied SNAP benefits, must be informed in the denial notice of the possibility of potential Categorical Eligibility should they become SSI recipients.

4. Procedures For Missed Scheduled Interviews

When an application is received in person, by mail or by inROADS, and the client subsequently misses a scheduled interview, the following procedures apply.

- Notice must be sent to the client informing him that he missed the scheduled interview and that it is his responsibility to reschedule. The notice is system generated once the Worker updates the client's status to "no show." This notice must be sent to the client within a reasonable amount of time to insure that the

Application/Redetermination Process

- interview and/or application can be completed within the 30-day application processing period.
- If the client contacts the office within 30 days from the application date, the Worker reschedules the interview and issues the RAPIDS notice NA2I to confirm the rescheduled appointment. If eligibility is established in the 30-day application processing period, benefits are prorated from the date of application. The application is denied on the 30th day after the application date if the interview cannot be rescheduled within the 30-day application processing period.
- Deny the application on the 30th day after the date of application when the client misses the scheduled interview and does not contact the office to reschedule it.

EXAMPLE: An application is received by mail on October 1st and an interview is scheduled for October 10th. The client fails to complete the interview and the notice of missed interview was issued from RAPIDS. The client does not contact the Worker to reschedule the interview by October 30th and the Worker denies the application on October 31st.

If the client misses both interviews or fails to keep or postpones the second interview at his request until after the 30th day following the date of application, the delay is the fault of the client. No benefits are issued until he completes an interview and supplies information to establish eligibility. The beginning date of eligibility is the date the information is supplied. Provisions in Section 1.4 for the beginning date of eligibility apply when the client completes all application requirements, including the interview, within 60 days of the date of application.

S. APPLICATION/REDETERMINATION VARIATIONS

Redetermination procedures are the same as application procedures except in the following situations.

All SNAP AG's must receive a notice of expiration of the certification period. For cases certified for more than one month, the notice must be received in the month prior to the last month of certification.

The local office has the following options in scheduling face-to-face redetermination interviews:

- Schedule an interview by sending an appointment letter to each AG to be redetermined.

The appointment may be scheduled anytime during the last month of certification. However, if the client's appointment is scheduled after the 15th, he may request and must be granted an appointment for the 15th or earlier. The client must be given 15 days from the date of the appointment letter before any penalties are applied for failure to keep the appointment.

- Redeterminations for pure SSI AG's may be initiated by SSA staff and completed by the Worker. The AG is notified of this service by form ES-FS-3. See **Special Considerations below**.

3. Completion

A SNAP redetermination is a reapplication for benefits. Under no circumstances are benefits continued past the month of redetermination, unless a redetermination is completed and the client is found eligible.

If the recipient is no longer eligible, the SNAP AG is closed.

Clients who reapply in a timely manner, complete the interview and provide requested verification within the Worker's deadline must receive uninterrupted benefits or have lost benefits restored if the Department's delays cause benefits to be interrupted. The client does not lose the right

The interview must take place the same day it is received via inROADS or a scheduled interview notice is required. When the application is submitted and e-signed through inROADS after business hours, the filing date is considered the same day.

b. Face-to-Face Interview Waiver Redetermination Process

AGs included in the SNAP waiver of the face-to-face interview must complete a redetermination by the end of the 6th month of eligibility. Under no circumstances are benefits continued beyond the last month of the certification period, unless the redetermination process has been completed and the AG is determined eligible. AGs that complete a redetermination in a timely manner, as specified in this section, must receive uninterrupted benefits or have lost benefits restored if the Department's delay causes an interruption in benefits.

(1) Redetermination Forms

RAPIDS form CSLE or inROADS is used. The CSLE, inROADS redetermination or the DFA-2 and DFA-RR-1 **or DFA-SNAP-1** may be used for a redetermination. RAPIDS automatically mails the CSLE in the 5th month of the certification period. The form must be completed and returned prior to the scheduled telephone interview date specified on the CSLE. The form is considered complete when signed and dated by the client or his authorized representative or completed and submitted by inROADS.

If the CSLE is not completed and returned by the end of the certification period, benefits are stopped. Notice of closure is required, but advance notice is not required. If the CSLE is returned in the month after the end of the certification period, no DFA-2 or DFA-SNAP-1 is required for reapplication. The CSLE is used as the application form and benefits are prorated from the date the application is received in that month.

NOTE: If the CSLE is used as an application form, a face-to-face interview is required, unless it is waived as specified in Interview Required of this Section.

(2) Redetermination Interview

An interview is required regardless of the method by which the redetermination is completed. A telephone interview is conducted unless one or more of the following criteria is met:

- The client or his authorized representative requests a face-to-face interview. The Worker must schedule the appointment; or
- The Department determines that a telephone interview is not appropriate due to questionable circumstances. The criteria stated in Section 4.1 for questionable circumstances for verifications, also apply to and serve as guidance for scheduling face-to-face interviews due to questionable circumstances. Supervisory approval and case documentation is required when scheduling a face-to-face interview due to questionable circumstances.

When an AG submits a completed CSLE or inROADS redetermination prior to the scheduled telephone interview date, the Worker must contact the AG at the specified time to conduct the telephone interview. The Worker must make a reasonable attempt to contact the AG to conduct the telephone interview. If an AG does not answer the Worker's call, the Worker must document in case comments the reasonable attempt(s) made prior to a determination that the appointment was missed. The AG is notified of the missed interview and the responsibility to reschedule. The notice of missed interview is included in the RAPIDS notice of closure and/or denial.

All cards are mailed to the payee following the address hierarchy in RAPIDS. See the RAPIDS User Guide. See **Effect on Card Distribution of Legal Guardian or Protective Payee Coded in RAPIDS** below when the AG has a legal guardian or protective payee coded in RAPIDS. This includes the card(s) for any additional authorized cardholder(s). It is the responsibility of the payee to distribute the cards to any other cardholder(s).

(2) Effect on Card Distribution of Legal Guardian or Protective Payee Coded in RAPIDS

When the Worker indicates in RAPIDS that the AG has a legal guardian or protective payee, all cards are mailed to the address of that individual. Current policy contains no reference to a specified legal guardian as a payee. Any other representative or protective payee is indicated in RAPIDS as a protective payee.

(3) Authorized Cardholder

The AG may designate an additional individual(s) as an authorized cardholder for EBT. The authorized cardholder has his own card and PIN and accesses the EBT account for the specified benefit(s) without restriction. For this reason, the choice of an authorized cardholder and its importance must be stressed with the applicant or recipient. The authorized cardholder is designated, changed or removed on RAPIDS screen AIRQ.

NOTE: When the individual designated as primary person for the AG has a legal guardian or protective payee coded in RAPIDS, the card for the AG is mailed to that person. In this situation, if the primary person or other individual must have a card, the information must be entered on screen AIRQ as an authorized cardholder. All cards are mailed to the address of the legal guardian or protective payee.

Only one authorized cardholder may be selected for SNAP benefits.

If the AG receives both SNAP benefits and cash assistance, they may select one authorized cardholder for each benefit. The maximum number of cards issued for any case is 3.