1.4

Application/Redetermination Process

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

not required. See Section on Application and Redetermination Variations for instructions on proration due to delayed processing.

- Categorically Eligible AG's, as defined in Special Considerations of this section, do not require a new form when all of the following conditions are met:
 - There is a WV WORKS application pending; and
 - SNAP benefits were denied; and
 - Subsequent to the denial, they are determined eligible to receive WV WORKS; and
 - The AG is otherwise Categorically Eligible.

The Worker provides benefits using the original application and any other pertinent information provided subsequent to that application. Benefits are paid from the date for which WV WORKS eligibility is established or the date of the original SNAP application, whichever is later. Changes must be recorded in case comments.

NOTE: If an active WV WORKS case, also certified for SNAP benefits, is closed and there is enough information to continue the SNAP certification, benefits are continued with no interruption. A new application must not be required. See Chapter 2.

- When an individual's SNAP work requirement penalty expires, or he becomes exempt, he is added to the AG, if otherwise eligible, without having to complete an application, unless he is the sole AG member.
- When a SNAP AG is closed for failure to complete the interim contact form, a new application is not required when the form is returned by the last day of the 13th month for households certified for 24 months. For households certified for 12 months, the form must be returned by the last day of the 7th month. Benefits are prorated from the date the interim contract form is returned. If the form is not returned, a new application must be completed.

- When a SNAP AG is included in the face-to-face interview waiver and is closed for failure to return a completed CSLE form, a new application is not required when the completed CSLE is returned by the last day of the month following the end of the certification period. See Section on Application/Redetermination Variations.
- 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.

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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.

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 and another may report a change. Unless it is otherwise documented from the AG, the authorized representative who completes the application is assumed to be authorized to report changes as well. An authorized EBT cardholder is considered to be authorized to report changes as well, but must not be considered authorized to complete an application or redetermination, unless specified by the AG. See The Benefit in this section for authorized cardholders for EBT. A recording must be made in case comments regarding the authorized representatives' status.

The AG must be informed that it is responsible for repayment of any overissuance caused by erroneous information provided by the authorized representative.

The RD or CSM may disqualify an authorized representative or authorized cardholder for up to one year, provided there is evidence that the individual has committed any one of the following offenses:

- Misrepresenting an AG's circumstances; or
- Knowingly providing false information about the AG; or
- Using SNAP benefits improperly.

The Worker must send written notification to the affected AG and the authorized representative or authorized cardholder 30 days prior to the date of the disqualification. The letter must include: the fact that disqualification of the individual is proposed, the reason for the action, the AG's right to a Fair Hearing, the telephone number of the office and the name of the person to contact for additional information.

This disqualification provision does not apply to drug and alcoholic treatment centers and GLF's which act as authorized representatives, information providers or authorized cardholders for their residents.

F. WHO MUST SIGN

More than one signature is never required for a SNAP application.

If an applicant for, or recipient of WV WORKS is applying for SNAP benefits, the SNAP benefits cannot be denied solely because of the absence of the two signatures that may be required for WV WORKS. The rules governing who must sign are the same as below.

The individual who is interviewed signs the application. If more than one individual is interviewed, both may, but are not required, to sign. Only an AG member or authorized representative may sign the application.

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Application/Redetermination Process

G. CONTENT OF THE INTERVIEW

All SNAP applicants must be screened for Expedited Service on the day the application is made, whether the client is applying for SNAP benefits only or SNAP benefits in combination with any other Program.

NOTE: The applicant may bring any person he chooses to the interview.

In addition to the responsibilities in Section 1.2, the Worker has the following additional responsibilities during the intake interview:

- Explain all aspects of the SNAP Program including application processing time limits, expedited service, basis of initial and ongoing issuance, combined issuance, method of issuance, date benefits should be received, how to use SNAP benefits and the EBT card.
- For homeless AGs with shelter costs, explain the option of using the Homeless Shelter Standard Deduction versus actual shelter and SUA costs.
- Explain the interview options that are available.
- Explain that the receipt of SNAP benefits has no effect on time limits for WV WORKS, and SNAP benefits may continue even when WV WORKS stops.
- Explain certification periods and specific reporting requirements.
- Explain the Department's employment programs and the requirements for keeping job/training appointments, accepting employment or training, registering for SNAP E&T and the consequences for failing to comply with the requirements.
- Explain the authorization to receive information and referral services about TANF and other programs offered by the WV DHHR.
- Explain the following about EBT:
- SNAP benefits will be deposited into an EBT account and accessed with an EBT card
- When the first card will be received and how to create a PIN.

- 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 10 days from the date of the DFA-6 or verification checklist.

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 a DFA-6 or verification checklist within 10 days, the Worker must wait until after the 10th day but no later than the 31st day to deny the application.

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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 10 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.

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.

Individuals who have committed an Intentional Program Violation (IPV) are ineligible for a specified time, determined by the number of previous IPV disqualifications. See Chapter 20.

The Worker must determine if any member(s) of the applicant AG has been disqualified and the length of the disqualification period.

M. BEGINNING DATE OF ELIGIBILITY

The beginning date of eligibility is the date of application when all eligibility criteria are met within 30 days of the date of application or the date that a signed signature page from inROADS is received. Benefits for the initial month are prorated from the date of application, over the number of days remaining in the month. Initial month means the first month following any period of time in which the AG was not participating.

If the AG fails to provide the information requested on a DFA-6, verification checklist, an electronic signature or a signed signature page from inROADS, within the 30-day processing time limit, but provides it within 60 days of the original application date, the date of eligibility is the date the information was provided. See Application Forms in this section. This only applies at application. See Application/Redetermination Variations in this Section for redetermination time frames.

EXCEPTION: For migrant and seasonal farm workers, the initial month is the first month following any break in certification of more than 30 days.

If an AG applies in WV, but received SNAP benefits for the same month in another state, the beginning date of eligibility is the first day of the month following the last month of receipt from the other state.

N. REDETERMINATION SCHEDULE

The client's certification period must be the longest possible period, but must not exceed 24 months for AG's in which all adult members are elderly or disabled with no earned income or only excluded earned income or 12 months for all other AG's.

- Establishing The Certification Period
 - a. 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.
 - 12 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.

b. Interim Contact Report

- A contact report must also be made midpoint of certification however no interview is required for this report. The Interim Contact Report is automatically mailed to the AG by eRAPIDS. The client must complete the Interim Contact Report and return it to the local office.

2. Adjusting The Certification Period

Extending a Certification Period

Once a 12-month certification period is established, the Worker may extend it to a total of 24 months only when all adult AG members are elderly or disabled and the AG has no earnings or only excluded earnings. No certification period may exceed a total of 24 months.

b. Shortening a Certification Period

Once a 24-month certification period is established, the Worker may shorten it only in the following situations and advance notice must be given. AG's certified for less than 24 months may not have their certification period shortened for any reason except ineligibility.

An AG with a 24-month certification period must be shortened when the AG experiences one or more of the following:

- The AG has an onset of non-excluded earned income;
- The AG is joined by an individual with non-excluded earned income;
- The AG is joined by an adult who is not elderly or disabled.

When the AG no longer qualifies for a 24-month certification period, the Worker must complete a redetermination when the advance notice period ends and assign a new certification period based on the AG's current circumstances.

EXCEPTION: When an adult who is not elderly or disabled joins the AG and the AG is approved for WV WORKS, the Worker must give advance notice that the SNAP certification period was shortened. No additional SNAP redetermination is required at this time. The WV WORKS application serves as the SNAP redetermination in this instance only.

EXAMPLE: An AG is composed of 2 elderly individuals who have only unearned income. The 24-month certification period is January 2005 through December 2006. On June 2, 2006, the AG adds their 25-year old son, who is not disabled. The Worker notifies the AG that the certification period is being shortened and that they must report for a redetermination in July 2006. When the redetermination is completed, a new 12-month certification period is assigned based upon the AG's new circumstances.

EXAMPLE: An elderly couple with only unearned income is certified for 24 months beginning January 2006. On May 24, 2006, their 12-year old granddaughter moves in with them. They apply for WV WORKS and are approved for benefits beginning May 2005. The SNAP certification period is not shorted because the new AG member is not an adult. The WV WORKS application does not serve as the SNAP redetermination.

EXAMPLE: A 1-person AG with no income is certified for 12 months, as the AG member has a pending RSDI disability claim. In the second month of the certification period, the RSDI is awarded and it is determined the AG is still eligible for SNAP benefits. The certification period is extended 22 months to equal a total of 24 months, now that all adult AG members are disabled without earnings.

EXAMPLE: An AG composed of 2 elderly adults with earnings and one child is certified for 12 months. In the second month, the AG reports the loss of earned income. Because all of the adult AG members are elderly without earned income, the certification period must be extended to 24 months. The extended certification period starts the month the change is effective.

EXAMPLE: An AG with only excluded earnings is composed of 2 children and 2 disabled adults and is certified for 24 months. In the 19th month, the AG reports the onset of non-excluded earnings. Changes in the benefit are made, and the AG is notified of a redetermination due the month the changes are effective.

O. EXPEDITED PROCESSING

NOTE: It is possible for a client to qualify for Expedited Service at any time during the application process.

Expedited Service is the term used for special procedures in processing applications meeting specific requirements. The requirements and procedures follow.

1. Eligibility Requirements

The following groups of cases are eligible for Expedited Service provided all other eligibility factors are met. They are:

- Those whose monthly gross income is less than \$150 and whose liquid assets do not exceed \$100.
- Migrant and seasonal farm worker AG's which have been determined Destitute, as defined in Chapter 10, and whose liquid assets do not exceed \$100.
- Eligible AG's whose combined monthly gross non-excluded income and liquid assets are less than the AG's monthly paid and unpaid shelter and the appropriate utility standard, if eligible. The AG's income and liquid assets must be less than the AG's monthly paid and unpaid shelter costs and the SUA amount for which the AG is eligible.

There is no limit to the number of times an AG may be certified under expedited procedures, as long as, prior to each expedited certification, the AG either completes the verification requirements that were postponed at the last expedited certification, or was certified under normal processing standards since the last expedited certification.

NOTE: Liquid assets must be evaluated when determining eligibility for Expedited Services even though the assets may not be counted toward the SNAP asset limit or are not required to be verified.

EXAMPLE: Mr. A was due for redetermination in April. He kept his scheduled appointment and continues to be eligible. He is not eligible for Expedited Service because his normal issuance cycle continues.

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

routine verification of them is postponed. This also applies to the verification of and the application for an SSN. All reasonable efforts must be made to meet all routine verification requirements prior to confirmation. See Chapter 4.

Postponed verification must be received prior to the second issuance.

EXCEPTION: Combined issuance procedures require verification be received prior to the third issuance.

If the applicant is able to verify identity, before, or at the same time, the additional information for which the case was pending is received, procedures for Expedited Service apply. The client also qualifies for Expedited Service if the verification of identity is received at the same time the pending information is received. In addition, if the pending information is received, but not acted on, and then the verification of identity is received, Expedited Service procedures are appropriate. This must be explained to the client.

Prior to approval, the non-exempt individual(s) who completes the application process is subject to the work requirements that apply at application. The Worker must also attempt to have all other non-exempt individuals in the AG comply with the work requirements prior to approval. When this is not possible within the Expedited Service time frame, all other non-exempt individuals must comply with the work requirements by the second issuance.

EXCEPTION: Combined issuance procedures require compliance prior to the 3rd issuance.

b. Time Limits

Federal regulations require that SNAP benefits be received by an eligible Expedited Service AG no later than the close of business on the 7th calendar day following the date of application.

To ensure this happens, consideration must be given to the following factors:

- SNAP benefits are available in the client's EBT account the day after approval in RAPIDS.

- If the AG does not already have an EBT card and/or PIN, the EBT card is mailed the day after entry of information in RAPIDS.
- The client must receive benefits no later than 7 calendar days after the date of application, including weekends and holidays.
- If eligibility is overlooked on the date of application or the client subsequently becomes eligible, data system action must be taken on the same date the Worker discovers the client is eligible.
- The intention of the Expedited Service policy is to provide assistance quickly. When an uncontrollable situation forces a delay, the application must be processed as soon as possible. A recording must substantiate the reason any expedited approval was not confirmed timely.

c. Combined Issuance

When a SNAP applicant meets all the following criteria, his first prorated benefit and first full benefit must be issued at the same time.

- The client applies for an initial month's benefits. Initial month
 is defined as the first month for which the AG is certified for
 SNAP benefits following any period of time during which the
 AG was not certified.
- Application is made on or after the 16th of the month.
- The client is eligible for the initial month and the next subsequent month.
- The client is eligible for Expedited Service.

To reduce the time period between the receipt of the Combined Issuance and the third month's issuance, the approval must be confirmed by the first working day of the third month if the client continues to be eligible.

The policy regarding Combined Issuance applies when the applicant is also a WV WORKS applicant. The procedures used to accomplish the Combined Issuance must not delay the processing of WV WORKS AG's.

The client must be told during the intake interview that his Combined Issuance must last until his next issuance is available and the date his next issuance will be available. He must also be told that no additional SNAP benefits are available should he use them all prior to receipt of the next issuance.

RAPIDS notifies each client who receives a Combined Issuance.

P. CLIENT NOTIFICATION

See Chapter 6.

Q. DATA SYSTEM ACTION

Each application requires data system action to approve, deny or withdraw and a recording in case comments to support the action.

R. SPECIAL CONSIDERATIONS

Special considerations are outlined below.

1. Joint SSI/SNAP Application/Redetermination Process

SSA offices accept SNAP applications for pure SSI AG's and forward them to the local office.

The work requirements in Section 13.2 are waived for individuals who complete the joint SSI/SNAP application process until eligibility for SSI is determined.

The date of application is the date the SSA/DHS-1 was signed at the SSA office.

NOTE: When a resident of an institution applies for SSI and SNAP benefits jointly prior to leaving the institution, the application date is the date the individual leaves the institution.

A pure SSI AG is one in which all members of the AG are either recipients of, or applicants for, SSI on the date application is made.

SSA Responsibilities a.

- Inform each client in a pure SSI AG that he may apply for SNAP benefits at the SSA or the local DHHR Office, and that service may be faster if they choose to apply at the DHHR office. If the client prefers to apply at the DHHR Office, SSA provides him with the address and telephone number of the appropriate office.
- Assist the client in completing form SSA/DHS-1.
- Inform the client to contact the local office about the status of his application.
- If the AG qualifies for Expedited Service, inform the applicant that the AG may receive these benefits faster if he applies at, or delivers the application to, the local office.
- Forward the SSA/DHS-1 to the local office within one working day, following procedures worked out between the CSM and the SSA contact person. See Section 1.2.
- Complete an SSA/DHS-1 for a redetermination when the client requests this service. SSA may initiate this action. Since SSA accepts the client's statement that his case is due redetermination, the local office may receive. SSA/DHS-1 for persons who are not actually due for redetermination.
- The local office completes the redetermination when the SSA/DHS-1 is received, whether it is due or not.

- A redetermination is indicated by "Recertification" written in red at the top of the SSA/DHS-1.
- All procedures and time limits which apply to applications accepted by SSA, apply to redeterminations accepted by SSA.

b. Worker Responsibilities

- Screen and, if eligible, process the application for Expedited Service.

NOTE: The date of application for the Expedited Service time limits is the date the application is received in the local office.

 Screen the SSA/DHS-1 to determine if further information is necessary.

If the form is incomplete, any needed information must be supplied by the client. The form is not returned to SSA, and, under no circumstances, is the client required to visit the local office for completion of the form. The client can be requested to visit the office, but the application cannot be denied solely because he does not. Needed information may be obtained by telephone, mail or home visit.

If verification not provided by SSA is needed, the Worker must notify the client of the required information within 3 working days of the date the application is received from SSA.

- Process according to normal procedures if the AG does not qualify for Expedited Service.
- Process any SSA/DHS-1's completed as redeterminations the same way applications are handled.

c. QC Errors

If an error is a result of information supplied by SSA, it is not included in the county's error rate. However, if SSA supplied the correct information and the Worker failed to take the appropriate action, the county is charged with the QC error.

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.

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.

EXAMPLE: A person applies for SNAP benefits and is authorized to receive information and referral services about TANF-funded programs. The DFA-SNAP I&R-1 is mailed out the day of approval and the client receives it 5 days later. The client is categorically eligible from the day of application even though the DFA-SNAP I&R-1 is received 5 days later.

(a) TANF-funded Programs

The following are TANF-funded programs:

- WV WORKS: Any month for which benefits are received
- Employment Assistance Program (EAP): Any month for which benefits are received
- DCA: 3 months beginning with the month of approval
- Support Service Payments: As long as actively enrolled in Work Programs (WP)
- SCA and WVSCA: Until the voucher expiration date
- (b) Authorized for Information and Referral Services
 The following AG's are authorized to receive information and referral services. The DFA-SNAP-I&R-1 is mailed to the AG by RAPIDS to inform the client of potential programs or services available to him. The DFA-SNAP-I&R is paid for by TANF/MOE funds.
 - AG's in which all adult members are elderly or disabled with no earned income or only excluded earned income with income at or below 200% FPL.
 - AG's with income at or below 130% FPL.

(2) Pure AG's

When the AG contains only recipients of SSI, or SSI and a combination of one of the mixed AG's as specified above, the AG is categorically eligible. This also includes the following:

- Persons determined eligible for SSI even though benefits have not been paid yet.
- Persons determined eligible, but who receive zero benefits, such as:
 - SSI recipients whose benefits are withheld for repayment
 - Persons whose SSI payments are suspended.
- The presence of any of the following people does not prevent the remaining AG members from being categorically eligible.
 - Ineligible alien
 - Ineligible student
 - Any individual disqualified due to enumeration
 - Any individual disqualified as a drug felon

NOTE: An SSI recipient who is convicted of a felony drug offense as described in Section 9.1,A is ineligible to be included in a SNAP AG.

b. Who is not Categorically Eligible

An AG is not categorically eligible only in the following situations

- A person who is normally required to be a member of the AG
 is disqualified due to an IPV.
- The AG refuses to cooperate in providing information necessary to make an eligibility determination.
- The AG is ineligible due to the striker provisions.
- The AG is in a penalty for transfer of assets.
- The AG does not meet any of the requirements in Categorical Eligibility, Who's Eligible Section.

c. Presumed Eligibility Requirements

Once it is determined that an AG qualifies for Categorical Eligibility, the following eligibility requirements are presumed to be met.

- Asset limit: The transfer of assets policy is applied as appropriate.
- Gross income limit, when applicable
- Net income limit
- Sponsored alien information
- Residency
- SSN information: Only if the AG member is receiving a benefit which requires the SSN to be verified.

If any of the presumed information is questionable, it is verified. All other eligibility requirements of the SNAP Program are applicable to categorically eligible AG's.

d. Special Processing Requirements

The following special processing requirements apply:

(1) TANF Benefit Applicants

To determine if an AG is categorically eligible due to its status as a recipient of TANF-funded benefits, the Worker may temporarily postpone, within the 30-day processing limit, the SNAP eligibility determination if the AG is not eligible for Expedited Service and appears categorically eligible.

- 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

- 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.

1. Redetermination Cycle

When a case is redetermined and found eligible, a new redetermination date is entered. See Redetermination Schedule in this section.

2. Scheduling Interviews

A face-to-face interview is required unless certain exceptions are met. See below. The same individual(s) who may be interviewed and sign the application may be interviewed and sign a redetermination.

EXCEPTIONS:

- The interview was completed by SSA. See Interview Required in this section.
- AG's that meet the criteria to have the face-to-face interview waived. See Interview Required in this section.
- AGs that are included in the SNAP waiver of the face-to-face interview. See SNAP Waiver of the Face-to-Face Interview in this section.

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 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

to uninterrupted benefits if the Worker establishes a deadline for verification which extends into the new certification period.

Uninterrupted benefits means benefits are received within 30 days of the last issuance. For longer certifications, uninterrupted benefits means benefits are received at the usual time in the issuance cycle.

EXCEPTION: AG's which have met all redetermination requirements are entitled to uninterrupted benefits. When this cannot be done due to the time frame for submitting missing verification, the Worker must take action to reinstate benefits so that the client receives benefits within five working days after supplying the missing verification, if eligible.

In the following redetermination situations, benefits are not prorated and the certification period begins the month following the end of the certification period.

- The verification is due within the last month of the certification period and is returned by the last day of the certification period; or
- The verification is due after the last day of the certification period and is returned by the date the Worker specifies. A reapplication is not required.
- The redetermination is not submitted until the month following the end of the certification period due to an Agency error.

In the following redetermination situations, benefits are prorated and the certification period begins the month following the end of the certification period and a reapplication is not required.

- The verification is due within the last month of the certification period and is not returned until the following month. Benefits are prorated from the date the verification is returned.
- The verification is due after the last day of the certification period and is returned after the due date, but by the end of the month it was due. Benefits are prorated from the date the verification is returned.

In the following redetermination situations, a reapplication is required. Benefits for the first month of certification and the beginning of the certification period are determined as they are for any other applicant.

 The verification is due within the last month of the certification period and is not returned by the end of the certification period or during the following month; or

- The verification is due after the last day of the certification period and is not returned by the last day of the month it was due, i.e., the month following the end of the certification period.
- The AG does not submit a redetermination before the end of the certification period.

EXAMPLE: A SNAP AG is redetermined on July 3rd and submits required verification by July 20th. The new certification period begins August 1. Benefits are not prorated.

EXAMPLE: Same situation as above, but the verification is not provided until August 4th. No reapplication is required and August is the first month of the new certification period. Benefits are prorated from August 4th.

EXAMPLE: A SNAP AG is redetermined on July 29th and the verification is due by August 8th. The verification is received in the local office on August 4th. The first month of the new certification period is August. Benefits are not prorated.

EXAMPLE: Same situation as above, but the verification is returned on August 20th. The first month of the new certification period is August. Benefits are prorated from August 20th.

EXAMPLE: Same situation, but the verification is not returned until September 3rd. The AG must reapply because the verification was not returned within the month following the last month of the certification period.

Clients who fail to reapply timely, fail to complete an interview or fail to submit missing verification by the established deadline lose the right to uninterrupted benefits. Some failures to provide verification may only result in loss of a deduction, not ineligibility.

When the client submits a redetermination, either in person, by mail, fax or inROADS, but fails to complete a scheduled interview for redetermination, he is notified of the missed interview and that it is his responsibility to reschedule the interview. In addition, he receives notice of AG closure if the redetermination is not completed.

When the client does not submit a redetermination and fails to complete a scheduled interview and redetermination, he is notified only of AG closure.

EXAMPLE: A SNAP redetermination is scheduled for September 1. The client calls the office and requests a redetermination form be mailed to him and that an interview be scheduled to accommodate his work hours. The interview is scheduled for September 10th and the client returns the redetermination form by mail on September 7th. The client misses the scheduled interview on September 10th. Because he filed a redetermination by mail, but missed a scheduled interview, the Worker sends a notice to inform the client he is responsible for scheduling another interview. At adverse notice deadline, if the client has not completed the interview, a closure notice is sent.

EXAMPLE: Same situation as above, but the client does not file a redetermination or appear for an interview. No notice is required for a missed interview because a redetermination was not submitted, but a closure notice is sent.

Overdue Redetermination

SNAP AG's which are due for redetermination and for whom a redetermination has not been completed are automatically closed by the data system on the adverse action deadline of the month when a redetermination is due.

SNAP Waiver of the Face-to-Face Interview

WV has implemented waivers to eliminate the face-to-face interview at application and redetermination. A telephone interview is required for all applications unless the household requests a face-to-face interview or the Worker determines a face-to-face interview is warranted for the household.

a. Face-to-Face Interview Waiver Application Process

A scheduled interview notice is not required when an interview is conducted the same day the application is received. A scheduled interview notice is required when an interview is not conducted on the date the application is received. This is applicable regardless of the method in which the application is received.

When the application is e-signed through inROADS, the filing date is the date of the e-signature. The application is not available to the local office until the following business day.

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.

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 last 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/CSLR or inROADS is used. The CSLE/CSLR 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 last month of the certification period. The form must be completed and returned prior to the scheduled telephone interview date specified on the CSLE/CSLR. 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/CSLR 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/CSLR is used as the application form and benefits are prorated from the date the application is received in that month.

NOTE: If the CSLE/CSLR is used as an application form, an interview is required.

(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/CSLR 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.

When an AG submits a completed CSLE/CSLR or inROADS redetermination after the originally scheduled interview date, the Worker must schedule another telephone interview appointment. The telephone interview appointment must be scheduled within a reasonable amount of time to permit notice to the client and to conduct the interview.

NOTE: All interviews must be scheduled using current RAPIDS procedures.

T. THE BENEFIT

USDA is responsible for authorizing business establishments to accept SNAP benefits. SNAP benefits may be used to purchase food for home preparation, seeds and plants which produce food for home consumption. SNAP benefits cannot be used to buy hot foods that are ready to eat or foods that may be eaten in the store.

SNAP benefits are deposited into an Electronic Benefit Transfer (EBT) account and accessed by using a card. This is the SNAP identification card for these AG's.

Initial Benefits

Initial benefits are usually received or are available within 3 days of entry in the data system.

a. Amount

A determination of the initial SNAP benefit month must be made to determine if initial benefits must be prorated. Any month determined to be an initial month must have benefits prorated. The amount of the initial allotment is prorated over the remainder of the month from the date of application. The full month's countable income is used to determine the full month's allotment. The amount of the initial benefit due the recipient is based on the number of days left in the approval month from the date of application as compared to the full month's benefit. The amount of the prorated benefit is determined by comparing the AG's full month benefit to the day of the month of application. Use Appendix D of Chapter 10. An initial prorated benefit is not issued.

b. Method of Issuance

If the approval occurs prior to deadline for the current month, eRAPIDS issues a prorated amount for the current month and the next month's benefit is issued based on the schedule in Ongoing Benefits below. If the current month's benefit is not confirmed until after deadline, eRAPIDS issues the prorated amount for the benefit month and the next full month's benefit is issued on the first day of that month. See Expediting Process in this Section for combined issuance when Expedited Service applies.

2. Ongoing Benefits

a. Amount

Once eligibility is established, the AG is eligible to receive SNAP benefits for a full month. See Chapter 10.

NOTE: When it is determined that a full month's benefit is \$0, the application is denied or the AG is closed. This applies whether or not the AG is categorically eligible.

b. Method of Issuance

SNAP benefits are available in the EBT account on a staggered schedule the first 9 calendar days of the month, based upon the payee's last name.

First Letter of Last Name	Calendar Day of Month
B, X, Y, Z	1
C, F	2
H, N, V	3
I, M, O, U	4
Q, S	5
A, W	6
J, K, P	7
D, E, R	8
G, L, T	9

Electronic Benefits Transfer (EBT)

SNAP benefits are deposited into an EBT account and accessed by using the EBT card and a Personal Identification Number (PIN), similar to a personal debit or ATM card. The possession of two or more EBT cards that do not identify the individual may be subject to criminal charges. The following outlines procedures which are specific to EBT. Additional information about how EBT affects other policy and procedures is found in specific Manual sections which apply.

a. EBT Definitions and Terminology

The following is a list of commonly used terms or acronyms associated with EBT.

Administrative Terminal - EBT vendor system used to inquire into EBT account information, reactivate expunged accounts, deactivate EBT cards and, in some instances, make changes to the EBT account.

IVRU - Interactive Voice Response Unit also referred to as EBT Helpline. The EBT vendor operates the IVRU 7 days a week, 24 hours a day. Functions of the IVRU include, but are not limited to, account balance inquiries, card activation and PIN changes.

Authorized Cardholder - An individual, who, in addition to the payee, may be issued an EBT card and access an EBT account.

CSR - Customer Service Representative for the EBT vendor who is reached through the IVRU toll-free number also referred to as the EBT Helpline. This person has the ability to replace or deactivate lost, stolen or damaged cards and to file a claim on behalf of a client regarding transactions.

Demographic Information - Identifying information about the AG's primary person which is sent to the EBT vendor in order to set up an EBT account and mail the EBT card. This includes the name, SSN and date of birth of the AG's primary person and the payee's address.

EBT - Electronic Benefits Transfer or the use of a card to access SNAP benefits.

EBT Helpline – The toll-free number through which the client may access the IVRU or CSR.

Mountain State Card - The West Virginia EBT card.

PIN - Personal Identification Number. This number must be used to access EBT benefits with the EBT card. This is not the RAPIDS PIN number.

POS - Point of Sale. This is used to spend SNAP benefits at a store. Account balance inquiries may be made using a store's POS machine located at the Service Desk. Account balances also appear on all receipts printed by a POS machine.

Status the EBT Card - Deactivate the card so that it cannot be used. This occurs when a replacement card is requested, a payee is changed or an authorized cardholder is removed or changed.

b. EBT Card Issuance

(1) Initial Card Issuance

The EBT card is issued when the first benefit to be issued into an EBT account is approved. It is mailed the day after the approval in RAPIDS. The PIN is no longer mailed to the cardholder. Once the card is received the cardholder must call the EBT Helpline to create a PIN and activate the card.

All cards are mailed to the payee following the address hierarchy in eRAPIDS. See the eRAPIDS 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 eRAPIDS. 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 eRAPIDS 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 eRAPIDS 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 eRAPIDS.

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 in eRAPIDS 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.

Once an authorized cardholder is chosen, the payee may stop the cardholder's access to the EBT account immediately by calling the EBT IVRU or DHHR Customer Service Center. Local office staff cannot inactivate a card. However, the DHHR Customer Service Center or local office Worker can change or remove a cardholder. When the client first calls the IVRU to stop cardholder access, he must still contact the DHHR Customer Service Center or local office to remove or change the cardholder.

(4) Cardholder Security

The demographic information sent to the EBT vendor for the primary person in the AG is the SSN, date of birth and address to which the card is sent. No demographic information is sent for any authorized cardholder. The authorized cardholder must know the date of birth of the AG's primary person and the address to which the card(s) is mailed. If the SSN is requested for a PIN change, the AG's primary person provides his own SSN and the authorized cardholder or representative/protective payee must provide zeros.

(5) Frequent Card Replacement

After a client requests a replacement EBT card 4 or more times in a rolling 12-month time period, an education letter is issued. This letter contains the penalties for trafficking, opportunities for additional education of card handling procedures, and informs the client that future replacements may be blocked until contact is made with the Department.

IFM will determine if the client meets the criteria for investigation and will notify the Worker for additional action needed on the case.

U. PERSONAL RESPONSIBILITY CONTRACT (PRC)

The PRC is not used for SNAP purposes.

V. ORIENTATION

Attending WV WORKS orientation is not an eligibility requirement for SNAP benefits.