

# Part 5

## Proving Continuing Eligibility

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### 95 What changes do I need to report to DTA?

When you are approved for SNAP, you are “certified” for a set amount of time. This is called your *certification period*. During your certification period you may have to do paperwork to keep SNAP. You may also have to tell DTA about certain changes. At the end of your certification period, you must do a Recertification so DTA can determine if you are still eligible for SNAP.

After your SNAP is approved, DTA will send you a notice telling you what your reporting rules are, how long your SNAP certification period is, and what kind of certification type you have.

There are **5 different SNAP certification types** with different reporting requirements. See the chart below.

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### SNAP certification types:

Certification Type	Which households?	What do I have to report and when?
<p><b>EDSAP:</b></p> <p><b>36 Month Certification Period</b></p> <p><i>See Question 98</i></p>	Households where all adults are either age 60+ or disabled and have no earned income (can include children under 18)	<p>Recertification at <b>36 months</b>. No Interim Reports.</p> <p>Otherwise, only required to report if:</p> <ul style="list-style-type: none"> <li>● someone joins or leaves the households <b>or</b></li> <li>● anyone in the household starts a job (has earnings)</li> </ul>
<p><b>Simplified Reporting:</b></p> <p><b>12 Month Certification Period</b></p> <p><i>See Question 96.</i></p>	Most SNAP households, including families with children, working adults, SNAP households where some but not all members get TAFDC, unemployed adults, students, households formerly on EDSAP, etc.	<p>Some households have an Interim Report at <b>6 months</b>. Recertification at <b>12 months</b>.</p> <p>Otherwise, only required to report if:</p> <ul style="list-style-type: none"> <li>● Gross income exceeds 200% FPL for the household size, unless household includes person 60+ or disabled (no reporting requirements for households with person 60+ or disabled).</li> <li>● If an ABAWD, must also report if meeting the rules through work and work hours drop below 20 per week. <b>(NOTE: The ABAWD rules are currently suspended.)</b></li> </ul>
<p><b>Simplified Reporting:</b></p> <p><b>36 Month Certification Period</b></p> <p><i>See Question 96.</i></p>	Households who were formally on EDSAP or Bay State CAP, but were moved to Simplified Reporting because of changes in their SNAP case.	<p>Interim Reports every <b>6 months</b>. Recertification at <b>36 months</b>.</p> <p>NO reporting requirements, unless there is an ABAWD in the case whose work hours drop below 20 hours per week. <b>(NOTE: The ABAWD rules are currently suspended.)</b></p>
<p><b>Change Reporting:</b></p> <p><b>12 Month Certification Period</b></p> <p><i>See Question 99</i></p>	“Public Assistance” cases – all members receive TAFDC (or some get TAFDC and some get SSI) or EAEDC cash benefits.	<p>Recertification at <b>12 months</b>.</p> <p>Also required to report a number of changes to household circumstances.</p>

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<p><b>Transitional Benefits Alternative (TBA):</b></p> <p><b>5 Month Certification Period</b></p> <p><i>See Question 102</i></p>	<p>Certain cases terminated from TAFDC due to income.</p>	<p>Recertification at 5 months.</p> <p>NO reporting requirements.</p>
<p><b>Bay State Cap:</b></p> <p><b>36 Month Certification Period</b></p> <p><i>See Question 4.</i></p>	<p>Certain individuals receiving SSI.</p>	<p>Recertification at 36 months.</p> <p>NO reporting requirements.</p>

## 96 What is Simplified Reporting and when must I report changes to DTA?

The majority of SNAP households are on “Simplified Reporting”. This means you do *not* have to report to DTA any changes most of the time except for when you have to do paperwork (an Interim Report or Recertification) to keep your SNAP benefits.

There are also times when you DO need to tell DTA about a change in between your reporting periods. The rules vary for different types of households.

### **Households without members age 60+ or disabled:**

You only need to tell DTA when your household’s *gross income goes over the monthly gross income limit* for your household size. [106 C.M.R. § 366.110\(C\)\(3\)](#). This includes if someone moves into your household with income that puts your household’s income goes over the limit.

Be sure to tell DTA *by the 10th day* of the month following the month your income went over the gross income limit. The gross income limit for your household is 200% of the Federal Poverty Level for your household size and should be listed on your approval notice. See Gross Income Chart in **Appendix B**.

**Example:** Selina is a single mom with one child on simplified reporting. She has a part time job, earning \$1,000 per month. Her SNAP was approved in January. Selina starts a second part time job in March earning \$200/week. Her total monthly gross income from both jobs is about \$500 below 200% FPL. She does not need to report the second job until her Recertification. However, in April Selina works more shifts and her gross income goes above 200% FPL. She needs to tell DTA by May 10<sup>th</sup> about this increase in income.

### **Households with members age 60+ and/or disabled**

You only need to report changes when DTA sends you an Interim Report or Recertification form. You *do not* need to tell DTA about any changes in between these forms.

Reporting rules are different for some households where all members are seniors or persons with disabilities. See **Question 98** about “EDSAP.”

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### When to report other changes to DTA

You are not required to report other changes, but you may want to report some changes if it will help boost your SNAP. For example, you may choose to report to DTA when:

- Your income goes down,
- Someone without income moves into your home or you have a baby,
- Your shelter, childcare or medical costs go up, or you start paying child support.

DTA is required to act on the information you report and increase your SNAP benefits if you are eligible for more. [106 C.M.R. § 366.110\(C\)\(4\)\(b\)](#).

**Example:** Suzyn and her 3 kids are on Simplified Reporting. Her employer reduces her hours. If Suzyn chooses to report and verify the drop in earnings, DTA will recalculate and increase her SNAP benefits. Unless her income goes over the Gross Income level for her household, she is not required to report anything else until her Recertification.

If the change you report results in your SNAP increasing to the maximum benefit amount, DTA should issue you a supplement for the month of the reported change. See **Question 103**.

If you send DTA pay stubs or other information that shows your income has gone up or your housing costs or other costs have gone down – even though you are not required to send it -- DTA may treat that information as verified and reduce your SNAP. See **Question 100**. See also [106 C.M.R. § 366.110\(C\)\(4\)\(b\)](#). If you move, see **Question 19**.

**DTA Online Guide:** See **Appendix G** for links to the DTA's BEACON Online Guide for this section.

## 97 What is the Interim Report and when do I need to do one?

Some households on Simplified Reporting (see **Question 96**) have to do an Interim Report in order to continue receiving SNAP. Only three groups of households on Simplified Reporting must do an Interim Report:

- Have no income on record with DTA (and are not homeless)
- Have income on record that is within \$200 of the gross income limit for their household size (see Gross Income Chart in Appendix B).
- Used to have to follow EDSAP rules (see **Question 98**) but who started working or had someone join or leave their SNAP household so DTA moved the case to regular Simplified Reporting. Or, households who used to be on Bay State CAP (see **Question 4**) but who went off Bay State CAP and did not qualify for EDSAP rules.

**Example:** Alexa is certified for 12 months, from January through December and gets her SNAP benefits the 1<sup>st</sup> day of each month. When she was approved she had no income and is not homeless. DTA requires Alexa to complete an Interim Report. If she doesn't, her SNAP will end after 6 months. DTA mails Alexa her Interim Report on May 15<sup>th</sup>, 45 days before July 1. She needs to finish the Interim Report process before July 1 to keep her SNAP without interruption.

The changes you are required to tell DTA about on the Interim Report are:

- If your household's income (earned or unearned) changed up or down by *more than \$125 per month*,
- You or anyone in your household started or stopped a job,
- You moved and what your new shelter costs are,
- Your household members have changed (e.g. someone moved in or out or you had a baby), or
- You are no longer legally required to pay out child support. See **Question 78**.

### How to complete your Interim Report

Do your Interim Report:

- Online on **DTA Connect**. See **Question 23**.

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- Call DTA at 877-382-2363 to do it over the phone.
- Fax or mail the report to DTA. See **Question 15**.
- Bring it to a local DTA office.

You do *not need an interview* as part of the Interim Report. If DTA reviews your Interim Report and determines they need additional proofs they will send you a Verification Checklist.

If you do your Interim Report and get DTA any proofs they need on or before the deadline, DTA should continue your SNAP without interruption.

### Troubleshooting:

**Late Interim Report form or missing proofs:** If you are late returning required proofs or doing the Interim Report, your SNAP may be delayed. If you get the proofs to DTAS within 30 days of when your case closed, DTA should reopen your SNAP back to the date DTA received your proofs. The benefits may be prorated if the delay was your fault.

**Interim Report not submitted:** If you do not do the Interim Report by the deadline your SNAP benefits will stop. DTA must send you a termination notice if they are closing your SNAP case for this reason, or if you are missing proofs. You have a right to get aid pending if you appeal within 10 days of the notice.

**30 Days:** If *less than 30 days* have passed from when DTA tells you your case is closing, you can do the Interim Report instead of doing a new application. If it's been *more than 30 days*, file a new SNAP application.

**Advocate if case was wrongly closed:** If you did everything DTA asked but your SNAP still closed, contact a DTA Office Supervisor, the Ombuds or file an appeal. See **Question 108**.

Note: Under federal rules DTA is required to send you a notice if they are stopping your SNAP at the point of Interim Report. [7 C.F.R. §273.12\(a\)\(5\)\(iii\)\(D\) and \(E\)](#). You have a right to appeal if you think DTA should not have denied you (for example because you sent in verifications that were requested). You also have a right to get aid pending if you appeal within 10 days of the date of the notice. See **Question 104**.

**DTA Online Guide:** See **Appendix G** for links to the DTA's BEACON Online Guide for this section.

## 98 What are the reporting rules for older adults and persons with disabilities without earned income (EDSAP)?

The Elder/Disabled Simplified Application Project (EDSAP) is intended to help eligible older adults and persons with disabilities more readily keep their SNAP benefits. There is less paperwork for you to fill out and less work for DTA to process your case. For example, your SNAP benefits are certified for 3 years (36 months) at a time, you do not need a Recertification interview or fill out any Interim Reports – just certain changes listed below.

You are eligible for EDSAP even if you have children in the household under age 18 as long as *every adult* in your household is:

- Age 60 or older, or
- Receives a disability-based benefit, and
- Does not have earned income.

Under EDSAP, you only need to tell DTA about **two changes**:

- When someone joins or leaves your household, **or**
- If you or anyone in the household starts to work.

You need to tell DTA about these changes by the 10<sup>th</sup> day of the month following the month of change. If these changes apply to you, DTA will move your case from EDSAP to Simplified Reporting. See **Question 96**.

**Example:** Edward, age 65, starts a new job in November and receives his first paycheck on November 28. He needs to report the earnings to DTA by December 10<sup>th</sup>. Edward's SNAP case will be moved out of EDSAP and onto Simplified Reporting. He is still certified for SNAP for the remainder of his 3-year certification period.

If you are on EDSAP, you are **NOT required** to tell DTA about any other changes. However, it is best to report increases in expenses if you are not getting the maximum SNAP benefit, such as an increase in rent or medical costs.

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If you are eligible for EDSAP, DTA will send you a notice telling you about your reporting requirements and when your 36 month certification period ends, and your reporting requirements.

**DTA Online Guide:** See **Appendix G** for links to the DTA’s BEACON Online Guide for this section.

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### 99 What is Change Reporting for cash assistance households?

Reporting requirements are different for households where all household members also get cash assistance from DTA. [106 C.M.R. § 366.110\(A\)](#). If *everyone* in your household receives TAFDC or EAEDC (or SSI and TAFDC), you are on “Change Reporting” and have to report more changes than households who are on Simplified Reporting or EDSAP.

If just *some of the people* in your SNAP household receive cash assistance (TAFDC, EAEDC, or SSI), you need to follow the Simplified Reporting rules. See **Question 96**.

For example: If you are a grandparent living with your teenage child and grandchild, and your child and grandchild get TAFDC together, your SNAP household is on Simplified Reporting.

If you are on Change Reporting, you must report the following within 10 days of the change:

- Your income (earned or unearned) goes up or down by more than \$125 per month. This is the rule for SNAP regardless of how your income is treated for TAFDC (even if DTA is disregarding 100% of your income for TAFDC).
- You start or stop a job.
- You move and what your new rent, mortgage or utilities are.
- Who lives with you changed (for example, someone moved in or out, or a baby was born).
- You are legally obligated to pay child support and your obligation changed. See **Question 78**.

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If your SNAP benefits will go down or end because of a change, DTA must give send you a notice at least 10 days in advance of the date your SNAP will change. Your benefits will not be decreased or stopped until after this ten day period. [106 C.M.R. § 366.200](#).

**Example:** Mary usually receives her SNAP benefit on the 2<sup>nd</sup> of the month. On 11/15, she reports an increase in income. By November 25, DTA must send her a written notice that her SNAP will go down. DTA cannot reduce her benefits until 12/5, 10 days after that notice. Since Mary will already have received her next SNAP on 12/2, her benefits will not decrease until January.

DTA does not have to give you a 10 day notice of a change when DTA has confirmed information that a household member has died, when there is a mass change (such as a Social Security cost of living adjustment) or in certain other situations. [106 C.M.R. §§366.210](#), [106 C.M.R. §366.215](#). In some situations, your benefits can be reduced or ended right away. [106 C.M.R. §366.120\(C\)](#). You still have the right to appeal. See [Part 6](#).

**DTA Online Guide:** See [Appendix G](#) for links to the DTA’s BEACON Online Guide for this section.

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## 100 What happens when DTA receives information about me after my SNAP application is approved?

Like all states, DTA uses different government and private company computer matches to find unreported income and check other information. When DTA receives information from you, or from data matches or information from other sources, they must follow specific rules about how and when they can follow up on the information.

Usually, DTA waits to ask you about the information at your Interim Report or Recertification. In limited situations they are allowed to ask you to verify the information and terminate your SNAP if you don’t reply. Sometimes they can act on the information they receive from third parties without asking you to verify it.

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This question explains how and when DTA should respond to new information they get during your certification period (outside of your Interim Report or Recertification). These rules depend on where the information came from, what changes you are required to report (see **Question 95**, and how recent the information is.

### Information that DTA will automatically act on

When DTA receives information directly from certain third parties, DTA can automatically act on the information right away without contacting you first. It can only do this when the information it receives is “*verified upon receipt*” – meaning the information is already verified by the source. Usually this is because the information came directly from the source that provides the benefit or took the action.

For example, DTA can automatically act on information it receives from:

- The Social Security Administration (SSA) about the amount of your Social Security benefits
- The Division of Unemployment Assistance (DUA) about your Unemployment benefits
- The Department of Children and Families when DCF removes a child from your home.

**Example:** SSA increased Tom’s Social Security benefits in January with a 10% cost-of-living increase. DTA received the benefit information from SSA and reduces Tom’s SNAP benefits without talking to Tom in advance. DTA will send Tom a letter that his SNAP benefits have gone down based on the increase in Social Security.

DTA can also act on verification *you send to them* during your certification period if they can tell without asking you for more proofs what the verification means for your benefit amount and eligibility. For example, if you send DTA your most recent 4 pay stubs, DTA will change your benefit amount based on those pay stubs without asking you for more verification.

### Information DTA cannot automatically act on

DTA also receives information from other agencies or sources that is not “verified upon receipt.” Because this information is not already verified by the source, DTA cannot use the information to make changes to your eligibility or your benefit amount. For example, DTA often gets

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information from “The Work Number,” (a service owned by a company called Equifax that helps large businesses with employee payroll information). DTA cannot automatically act on information from The Work Number because the Work Number is not the employer who hired and is paying wages to the household (unlike the example above of the SSA paying Social Security benefits).

When DTA receives “unclear information,” they can only require you to provide proof about the information outside of your Interim Report or Recertification in two situations:

- the information DTA received is recent (less than 60 days old) **and** - if the information is accurate - you would have been required to report it. For example, if you have earnings and you are an EDSAP household. See **Question 95**, or
- the information conflicts with the information you gave DTA when you applied for SNAP or when you did your Recertification. For example, when you applied you told DTA you had no income, but DTA gets a data match that you had income from a job you had at the time you applied.

**Example:** Jane was approved for SNAP in January and her case is on Simplified Reporting. DTA learns through The Work Number that Jane started working at McDonald’s part-time in September. DTA cannot reduce Jane’s SNAP even if they learn of the wages through The Work Number because The Work Number data is “unclear information” **and** Jane was not required to report the change in income until September, when her Recertification is due. She was not required to report it because her gross monthly income stayed below the gross income test (see **Question 95**). DTA can ask Jane for more information about her McDonald’s job at her Recertification.

If you think DTA stopped or denied your SNAP because of information they received from another source or because of a data match, contact MLRI at [info@masslegalservices.org](mailto:info@masslegalservices.org).

**DTA Online Guide:** See **Appendix G** for links to the DTA’s BEACON Online Guide for this section.

## 101 When do I need to recertify my SNAP and what do I do?

When your certification period ends, *your SNAP will stop unless you timely reapply or “recertify” for benefits.* [106 C.M.R. §364.700](#). SNAP is certified for 12 or 36 months. See **Question 95**. Within 45 days before the end of your certification period, DTA will send you a Recertification form to fill out. [106 C.M.R. § 366.310](#).

When completing the form, you *need* to tell DTA about:

- Changes to your address or phone number,
- If someone joined or left your household,
- Any changes to noncitizen status,
- If anyone is a student, and
- Income for all household members.

**You also have the *option* of telling DTA about:**

- Dependent care costs,
- Housing and utility costs,
- Medical costs,
- Child support payments you make.

You can return your signed Recertification form to DTA one of four ways:

1. Complete the Recertification online on **DTAConnect.com**. See **Question 23**. This is the fastest way to do the paperwork!
2. Call DTA to complete it by phone at 877-282-2363.
3. Send it to DTA by fax or mail **OR**
4. Bring it to a local DTA office.

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### Recertification interview:

In general, most households are interviewed by phone. [106 C.M.R. §§ 366.320\(B\), 366.330\(A\)](#). This is similar to the application interview. See **Question 10**.

Currently, the interview is waived for households who give DTA all mandatory verifications when they do the Recertification paperwork.

**Example:** Jolene and her partner do a SNAP recertification, and at the same time they send DTA copies of recent pay stubs on DTAConnect. DTA waives the phone interview and approves their SNAP.

Alternatively, Jolene reports to DTA that both she and her partner have new jobs. But, she only sends in one pay stub for herself and no pay stubs for her partner. DTA sends out a notice scheduling an interview and a Verification Checklist requesting copies of a month's worth of pay stubs for both jobs. If Jolene sends in all the pay stubs, DTA should cancel the scheduled interview and approve the SNAP without an interview.

There is no *recertification interview* for EDSAP households. If you are on EDSAP (see **Question 98**) DTA will still schedule a recertification interview for you if you ask for one, the information you provided is questionable, or your SNAP case is going to close.

### Keeping Your SNAP without Interruption:

DTA should give you enough time to complete and return the recertification paperwork to continue your SNAP benefits *without interruption* – as long as you get the form back on time and are still eligible. [106 C.M.R. § 366.320\(A\) and \(B\)](#). DTA should send you a notice if you return the form and for some reason your SNAP will be delayed.

If you send the form back after the DTA deadline, you may have an interruption in benefits. *If you do not return the form*, your benefits will stop. You will not get any additional notice from DTA.

If you sent DTA your recertification and any necessary proofs on time but didn't get your SNAP benefits on time, check your case status on DTA Connect or call the DTA Assistance Line to speak with a worker.

### Getting a closed case reopened:

DTA should reopen your case if you sent in the recertification form before the deadline, **and** you get your missing proofs in within 30 days of the date your case closed. You do not have to start a new application. [106 C.M.R. §](#)

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[366.340. 106 C.M.R. § 361.700\(B\)\(2\)](#). Your benefits may be pro-rated if the delay was your fault.

If your SNAP closed at the point of Recertification and *less than 30 days* have passed, you can send DTA your Recertification instead of doing a new application. If more *than 30 days* since your case closed, file a new SNAP application.

**DTA Online Guide:** See **Appendix G** for links to the DTA's BEACON Online Guide for this section.

## 102 If my TAFDC case closes, do my SNAP benefits continue?

If your family was receiving TAFDC and your benefits end you may *automatically get five months of SNAP benefits*. This special benefit is called the Transitional Benefits Alternative or “TBA.” TBA does not apply if your TAFDC closes due to a TAFDC program sanction.

The amount of SNAP you get will be calculated using *only* the income you had in the month your TAFDC benefits stopped. DTA will not count the amount of your TAFDC that stopped. DTA will also *not count new income* you receive that caused your TAFDC to close, such as new earnings or child support. [106 C.M.R. § 365.190](#).

**Example:** Mary gets TAFDC for herself and her baby. She has no other income. After a couple of months, the baby’s father gets a new job and she begins to get \$800 per month in child support. When her TAFDC closes, her TBA SNAP is calculated based on \$0 of income (the TAFDC she was getting and the new child support – which caused the TAFDC to close – do not count). This helps Mary transition off TAFDC.

During the five-month TBA period, you are *not* required to report any changes in your household. You do have the option to report changes and if you report a change that could *increase* your benefits (such as loss of income or the addition of a household member), DTA is required to act on that change and recertify your benefits to the higher amount. See [106 C.M.R. § 366.110\(B\)](#).

About 45 days before the end of the 5-month TBA period, DTA should send you a recertification form that you will need to complete in order to continue your SNAP.

**Note:** If you get TAFDC and start a job, DTA does not count 100% of your earnings for up to 6 months, as long as your TAFDC household’s gross income stays below 200% FPL. With this 100% earnings disregard, it is usually better for you to keep your TAFDC instead of closing the TAFDC case and getting the TBA benefit. However, each family is different. Your DTA cash assistance worker should be able to explain how this works, or contact MLRI at [info@masslegalservices.org](mailto:info@masslegalservices.org).

## 103 How quickly will DTA increase my SNAP if my income decreases or my expenses increase?

DTA has to take action on certain changes that you report to them. After you report the change, DTA may ask for proof of the change. You may be eligible for *supplemental SNAP benefits* for the month you report the change in addition to DTA increasing your SNAP in the future.

*If your net countable income drops to \$0 dollars* – meaning your SNAP increases to the maximum SNAP benefit for your household size -- DTA should issue you a supplemental payment of SNAP for the month you report the change. [106 C.M.R. § 366.120\(A\)\(1\)](#).

**Example:** Kristina and her 2 kids get \$50 on the 2<sup>nd</sup> of each month in SNAP because she is working. Kristina’s company lays her off and on June 15<sup>th</sup> she reports to DTA that she has lost her income. DTA should increase Kristina’s SNAP to \$766 on July 2<sup>nd</sup>, and should also issue a supplemental SNAP payment of \$716 for June.

*If you report a new household member or a change in income of \$50 or more*, DTA must adjust your SNAP benefits effective with the first payment you are due ten days after you reported the change. If you report the change after the 20<sup>th</sup> of the month and it is too late in that month to increase the next month’s payment, DTA should give you a supplemental SNAP payment so that you get the increase by the 10<sup>th</sup> day of the following month or on your normal issuance date, whichever is later. [106 C.M.R. § 366.120\(A\)\(2\)](#).

**Example:** Marian and her husband have earnings from his job and get SNAP on the 5<sup>th</sup> of each month. She is pregnant and has a baby. Marian calls DTA on May 29<sup>th</sup> and reports the baby was born. DTA should increase Marian’s SNAP beginning in July because there is less than 10 days from May 29<sup>th</sup> to June 5<sup>th</sup> - but should also issue a supplement so that her SNAP amount is higher on June 5.

If you have an overpayment, DTA should not intercept supplemental SNAP payments to offset an overpayment.

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For all other changes, DTA must make the change effective no later than the first SNAP allotment issued 10 days or more after the change was reported to DTA. [106 C.M.R. § 366.120\(B\)](#).

**DTA Online Guide:** See **Appendix G** for links to the DTA's BEACON Online Guide for this section.