

CSBG Utah Income Verification Policy

Policy

This policy pertains only to programs and clients that are using CSBG funds.

All clients receiving services or participating in programs that use CSBG funding must be able to demonstrate that they are eligible for the CSBG program and that the household gross income, of those 18 years or older, is 125% or less than the federal poverty guidelines.

According to Community Action Program Legal Services (CAPLAW), the income of all members of each individual family unit must be included in determining the income eligibility. A family unit is either (1) related individuals, or (2) an unrelated individual excluding house mates (renters or leasers).

The term 'related individuals' means two or more persons related by birth, marriage, and/or adoption who reside together.

The term unrelated individual means an individual who is not an inmate of an institution: (1) who resides alone or (2) who resides with one or more persons who are not related to him/her by birth, marriage, and/or adoption.

If a household includes more than one family unit, the poverty guidelines shall be applied separately to each family unit, and not to the household as a whole.

If a person lives with a family, add up the income of all family members. (Do not count Non-relatives such as housemates [renters, leasers])

Income Verification Types

In order to accurately determine an individual's or household's gross income, the following sources, as described by the US Census Bureau, must be considered in the income determination:

- Gross earnings from employment (wages, salaries, tips, commissions, bonuses etc.)
- Unemployment compensation (public or private)
- Workers' compensation
- Social security
- Public assistance or welfare payments in the form of cash (TANF, SSI, non federal General Assistance, or General Relief money payments)
- Veterans' payments
- Survivor benefits
- Disability benefits
- Pension or retirement income
- Regular insurance or any type of annuity payments
- College or university scholarships, grants, fellowships, and assistantships

- Interest income on assets in excess of \$10,000
- Dividends
- Rents, royalties, and estates and trusts
- Educational assistance
- Alimony
- Child support
- Financial assistance from outside of the household
- Other income (military family allotments or other regular support from an absent family member or someone living in the household, etc.)
- If a person lives with a family, add up the income of all family members. (Non-relatives, such as housemates, do not count.)

Agencies should not include the following when verifying income:

- Capital gains people receive(d) (or losses they incur) from the sale of property, including stocks, bonds, a house, or a car (unless the person was engaged in the business of selling such property).
- Noncash benefits (such as food stamps, housing subsidies, Medicare, Medicaid, or school lunches)
- Withdrawals of bank deposits
- Money borrowed
- Tax refunds
- Gifts, loans, lump-sum inheritances, one-time insurance payments, or compensation for injury
- Fringe benefits
- Food or housing received in lieu of wages

Income Verification Sources

Acceptable source documentation includes, but is not limited to the following:

- Check stubs
- Bank Statements
- Proof of SSI or Social Security
- Written statements from employers
- Previous year tax form 1040 for self-employed individuals
- Award letters for government transfers
- Statement from a government entity illustrating eligibility for other programs with the same or lower poverty limit

In order to accurately determine income eligibility for program services, the eligibility determinations must be based on gross household income for the 30 days prior to application for assistance/services. In order to continue to qualify for services, each Agency will require recipients of CSBG funded services to submit approved income documentation at a minimum of once every 12 months. In order to accurately demonstrate client eligibility, the following items must be included in each client file:

- Current poverty guidelines
- Gross income for all household members over 18 (as determined from the above sources)
- Source documentation for determining income and income types and amounts
- Calculations used to determine annualized gross income

Agencies must also determine the frequency and possible variations in pay in order to accurately determine income. The State will monitor and audit calculations and variations that are used.

Once an application is filled out, submitted, and verified, if any household member refuses to disclose income, or sign a self declaration of no income, that client will not be eligible for services under CSBG funded programs.

Agencies are also required to verify residency using a financial or bill statements, letters or documents from an official government source or verifiable entity, or other confirmable source excluding friends, relatives, or neighbors. Mailed sources must have been received by the applicant within 30 days prior to the application being filled out and submitted.

Limited in-take procedures

In situations where individual income verification is not possible or practical, or the client claims zero income, eligible entities are required verify income in one of the following ways:

- a) Using third party documentation, such as other government funded program applications (e.g. SNAP and TANF, etc.).
- b) In the situation that income documentation does not exist, or the participant has tried to retrieve documentation of proof of income and has been unsuccessful, the participant is required to complete and sign a self-declaration of no income (when the participant is able to obtain proof of income, the participant is required to submit it to a case manager who will assess the income eligibility of the services provided).
 - a. It is recommended that the agency confer with the Utah Department of Workforce Services verify the client's zero income claim.

In the case where individual income verification is not possible or difficult, income verification must be rechecked every 6 months.

Procedures

The procedures for verifying income eligibility will be left to the discretion of the eligible entities. The following procedures are a minimum guideline for agencies to follow:

- A. All clients must fill out an application that is suitable to the CAA.
 - a. The front of the application should list all necessary documents the client needs to provide.
 - b. Application should, at a minimum, collect the following information:

- i. Family type
 - ii. House hold size
 - iii. Approved household income
 - iv. Income type(s)
 - v. Corresponding income source(s)
- B. Verify Income with approved methods
- C. Verify Identification with the following sources
 - i. Photo ID
 - ii. Drivers License
 - iii. Social Security Card
 - iv. Other _____
- D. Approve the client for services, either face to face, by phone, or other effective methods within 48 hours of application being completed and submitted.
- E. For services received using CSBG funds, re-verify income eligibility at a minimum of every 12 months for most clients or every six months for clients claiming zero income or where income is difficult to verify.

Each of these areas in the procedures will be verified during the annual monitoring visit.