

STATE OF CONNECTICUT
DEPARTMENT OF SOCIAL SERVICES
PROGRAM INFORMATION BULLETIN


 Kathleen Brennan, Deputy Commissioner

October 7, 2019
 Effective Date

INFORMATION BULLETIN NO: 19-03 **PROGRAM (S):** SNAP

Subject: SNAP Homeless Shelter Deduction (Temporary Housing Deduction)

Introduction: On Dec. 20, 2018, the Supplemental Nutrition Assistance Program (SNAP) was reauthorized as part of the Agriculture Improvement Act of 2018. Section 4004 of the Act amends section 5(e)(6)(D) of the Food and Nutrition Act of 2008 to make the current option to provide a shelter deduction to homeless households in which all members are homeless individuals that are not receiving free shelter throughout the month and do not opt to claim an excess shelter deduction mandatory for all States.

<p>What is the Homeless Shelter Deduction?</p>	<p>The SNAP Homeless Shelter Deduction or Temporary Housing Deduction as it will be identified to SNAP recipients is a deduction that the Department will allow to homeless households in which all members are homeless and the household incurs or reasonably expects to incur a shelter related expense in a month. Although many homeless households may not have income and therefore will receive the maximum SNAP benefit, the Homeless Shelter Deduction will assist those homeless households that have income (earnings, income from Social Security, Veteran’s Benefits, etc.) and do incur shelter related costs in a month by allowing the households to utilize this deduction. This deduction is also intended to capture those individuals who may not identify themselves as homeless, but still meet the criteria listed below.</p> <p>The Homeless Shelter Deduction value will change every October to account for COLA considerations.</p>
<p>What is the definition of homeless?</p>	<p>7 C.F.R. § 271.2 defines homeless as an individual who lacks a fixed and regular nighttime residence or an individual whose primary nighttime residence is:</p> <ul style="list-style-type: none"> • A supervised shelter designed to provide temporary accommodations; • An institution that provides temporary residence for individuals intended to be institutionalized; • A temporary accommodation for not more than 90 days in the residence of another individual; or • A place not designed for, or ordinarily used, as a regular sleeping accommodation for human beings (a hallway, a bus station, a lobby, or similar places).

	<p>This definition of homeless includes a more expansive population than that of what the Department traditionally considered “homeless”, as it not only captures those who self attest as homeless or those who reside in a homeless shelter, but those who may not self-identify as homeless.</p>
<p>Who is eligible?</p>	<p>SNAP households in which all members meet the CFR definition of homeless and incur or reasonably expect to incur a shelter related expense in a month may be potentially eligible to receive this deduction. Homeless households who are eligible include but are not limited to:</p> <ul style="list-style-type: none"> • Families who lack a fixed and regular nighttime residence; or • Individuals whose primary nighttime residence is a supervised publicly or privately operated shelter designed to provide temporary living accommodations; or • Those who reside in a temporary accommodation for less than 90 days in the residence of another individual; or • A place not designed for, or ordinarily used, as a regular sleeping accommodation for human beings (a hallway, a bus station, a lobby, or similar places). • Individuals who are “doubled up” or living in a housing unit with extended family, friends, and other non-relatives due to economic hardship. <p>Please note that there is no limit to the number of times a homeless household can claim this deduction nor is there a limit to the number of times a household can go from homeless to a more permanent living arrangement.</p>
<p>What are some examples of individuals who may not identify as homeless, but meet the definition of homeless?</p>	<p>Examples of individuals who may not identify as homeless but meet the definition of homeless are those individuals who temporarily:</p> <ul style="list-style-type: none"> • Reside in a hotel or motel; • Reside with a friend or relative; • Couch surf; or • Homeless households who reside in a temporary living arrangement that the household itself doesn’t recognize as a “homeless” living arrangement, but the living arrangement meets those identified in the definition of homelessness. <p>Keep in mind that any accommodation lasting or expected to last beyond 90 days is <u>not</u> considered temporary and a homeless household would not be entitled to receive the SNAP Homeless Shelter Deduction.</p>

<p>What are allowable expenses under the Homeless Shelter Deduction?</p>	<p>Allowable expenses under the Homeless Shelter Deduction include but are not limited to:</p> <ul style="list-style-type: none"> • Rent • Payments to a friend or relative in exchange for temporary housing • Utility costs • Payments to a shelter • Payments to a hotel or motel • Laundry costs • Costs associated with residing in a car
<p>Do allowable shelter expenses for homeless households have to be verified?</p>	<p>The Department will continue to accept client statement as an acceptable form of verification for shelter and shelter related expenses unless questionable.</p>
<p>Can a homeless household receive the Homeless Shelter Deduction Traditional Shelter Hardship concurrently?</p>	<p>The Homeless Shelter Deduction replaces the traditional Shelter Hardship Deduction in the SNAP calculation. Homeless households cannot receive the SNAP Homeless Shelter Deduction and the Shelter Hardship simultaneously. A homeless household also cannot receive the Homeless Shelter Deduction and the SUA \$, SUA, or TUA simultaneously. The rationale is that the Homeless Shelter Deduction accounts for all shelter related costs.</p> <p>Either the Homeless Shelter Deduction or the traditional Shelter Hardship can be allowed in determining SNAP eligibility/benefit level. SNAP households may not receive both simultaneously.</p> <p>There is no limit to the number of times a homeless household can switch between the Homeless Shelter Deduction and the traditional Shelter Hardship.</p>
<p>How does Eligibility staff determine if a homeless household is to receive the Homeless Shelter Deduction or the traditional Shelter Hardship?</p>	<p>If a homeless households pays a shelter expense that is in excess of the actual Homeless Shelter Deduction then the household can claim their actual shelter costs and is entitled to receive the traditional Shelter Hardship. For shelter related expenses that are up to, but not in excess of the current Homeless Shelter Deduction value, the household is entitled to receive the Homeless Shelter Deduction (Please see examples below).</p> <p>In addition, parameters are built into ImpaCT to evaluate, complete a comparison, and determine which deduction is more advantageous to the SNAP household. Staff should continue to review the Federal SNAP-Income Test page in ImpaCT to ensure that the proper deduction has been applied to the SNAP household.</p> <p>Note that if a homeless household has expenses that are in excess of the traditional Shelter Hardship cap, they are only entitled to the Shelter Hardship cap if a household meets the criteria to lift the cap (elderly/disabled households).</p>

<p>How should Eligibility staff handle SNAP cases screened in October, but granted after the 10/31/19 implementation of the Homeless Shelter Deduction?</p>	<p>The Homeless Shelter Deduction will affect cases in which eligibility is run after 10/31/19. Cases screened in the month of October that exceed the 30 day SOP should be reviewed for eligibility for the Homeless Shelter Deduction prior to grant. The new Homeless Shelter Deduction values on the Living Arrangement- Details page and the Shelter Expense-Details page will not have been present at the time the case was screened and Eligibility staff should review these screens and, if applicable, make the appropriate updates to reflect the homeless household's circumstances.</p>
<p>In what instances should staff be selecting "At Home" on the Living Arrangements Details-page in ImpaCT?</p>	<p>The "At Home" selection in ImpaCT is intended to capture less prevalent living arrangement types related to transient households as well as those homeless households who may not identify as homeless, but meet the Departments definition of homeless. If a case meets this scenario, be sure to also update the "Is this living arrangement expected to last less than 90 days?" question to properly trigger a Homeless Shelter Deduction in ImpaCT.</p>
<p>Examples</p>	<p>A homeless household pays \$200 monthly in rent and is currently receiving the SUA \$. The household is entitled to receive the SUA \$ for the full SUA \$ year. Therefore, the household would continue to receive the traditional SUA by virtue of receipt of the SUA \$ and would not be entitled to receive the Homeless Shelter Deduction.</p> <p>A homeless household pays \$200 monthly in rent and is not currently receiving the SUA \$. The household would be able to claim the actual shelter cost of \$200 and is entitled to the traditional Shelter Hardship, as the amount of rent paid monthly is in excess of the \$152.06 Homeless Shelter Deduction.</p> <p>The current Homeless Shelter Deduction is \$152.06. A homeless household reports that they are temporarily residing with a friend and paying \$200 monthly in rent. The household would be able to claim the actual shelter cost of \$200 and is entitled to the traditional Shelter Hardship, as the amount of rent paid monthly is in excess of the \$152.06 Homeless Shelter Deduction.</p> <p>A homeless household reports paying \$50 monthly for laundry related costs. \$50 does not exceed the current Homeless Shelter Deduction of \$152.06. The household would be entitled to receive the \$152.06 Homeless Shelter Deduction as the shelter related cost does not exceed the current Homeless Shelter Deduction Value.</p>

Disposition: Retain for future reference.
Distribution: SNAP Eligibility Staff
Responsible Unit: SNAP unit
Date Issued: 10/7/2019