

**Texas Department of Housing and Community Affairs
Systematic Alien Verification for Entitlements (SAVE)
Frequently Asked Questions (December 2018)**

The Texas Department of Housing and Community Affairs (the Department) has created the following document to assist its CEAP, LIHEAP WAP, and DOE WAP Subrecipients to answer SAVE related questions. In addition to this document, Subrecipients are encouraged to take the following steps to respond to their questions:

1. Reference Welfare Act §432, 8 USC 1642(b)
2. Complete the [SAVE Comprehensive Tutorial](#)
3. Review ALL documents posted on the [SAVE Guidance Page](#) (TDHCA Website)
4. Review ALL documents posted on the SAVE Resources Website

If after following the above steps, and reading this document, you still have questions, you may submit a program question by completing this form: <https://tdhca.wufoo.com/forms/request-for-ca-program-assistance/>.

You may click on the hyperlinks below to move to the most appropriate category that applies to your question.

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SAVE Information

1. **Where can I find the SAVE webinar on the Department website? Would it be possible to watch it again?**
[The Department webinar and slides are posted to the Department SAVE Webpage](#). Additionally, the Department requires all SAVE users to complete the [SAVE Comprehensive Tutorial](#) and print out the certification of completion for future monitoring.
2. **I am trying to follow up on the SAVE webinar. Where can I find any information the Department has on the SAVE process and ensuing documentation needed for that process?**
All the information the Department has on the SAVE program is located on our website at: <http://www.tdhca.state.tx.us/community-affairs/save.htm>. On this webpage, you will find program forms and guides, important SAVE links, and access to the SAVE System.

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SAVE Documentation

- 3. If I've read this information properly, all applicants for CEAP and WAP (both LIHEAP and DOE) that present as US citizens must produce evidence that they are US citizens? What are the acceptable forms of documentation?**

There is primary or secondary documentation that all clients must present to prove status. Please review slides 3-6 of the SAVE presentation slides.

The Department is aware that this requirement will cause some learning/growing pains with both the Subrecipient staff and the clients, but we must comply with this rule.

- 4. Can a client self-certify citizenship or qualified alien status?**

No, the client must provide documents as outlined in the SAVE webinar and SAVE guidance.

- 5. If copies of documentation are not required to be placed in the file for a U.S. citizen, is the designed SAVE certification form sufficient proof in the file that status was visually confirmed for a citizen?**

Proper documentation will consist of a completed and signed certification form placed in the client file, along with the citizenship documents themselves. Please ensure the security of these documents.

- 6. When an applicant tells us "YES, I am a citizen" what type of documentation can we require of them? The information lists the documents we can accept to show qualified alien status, but most clients who are citizens only have a driver's license as ID; is that acceptable citizenship documentation?**

No. A driver's license alone is not sufficient documentation of citizenship. Driver's licenses are considered secondary documentation and therefore are only one of the two documents needed for verification. The driver's license is a government issued photo identification, which must be presented along with a secondary document of citizenship (see slides 4-6 of the SAVE presentation).

- 7. Clients are asking if the U.S. birth certificate card and the U.S. passport card are acceptable documents. We have been saying "no" since neither of these documents are listed in the SAVE Webinar Training nor in the Identification guide. Are we correct, or are these documents acceptable as proof of citizenship?**

According to the US State Department website, "*The passport card is adjudicated to the same standards as the passport book. You must provide documents that establish your U.S. citizenship and identity*". Because of this, the Department would say Subrecipients can accept the passport card as proof of citizenship.

The same does not seem to be true for the birth certificate card. The paper copy with a raised seal is required to prove US birth in all instances the Department has found. The birth certificate card is not acceptable documentation.

- 8. If an applicant presents an original birth certificate listing them born in another country and**

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has a government issued ID Card, we can assist them under CEAP without going through the SAVE System?

Not necessarily. They would be considered a US National if the birth certificate lists them being born in one of the "US Possessions" listed here:

1. Puerto Rico
2. U.S. Virgin Islands
3. American Samoa
4. Guam
5. Swains Island
6. The Panama Canal Zone before October 1, 1979
7. The Commonwealth of the Northern Mariana Islands after November 3, 1986
8. The Philippines before July 4, 1946

If they were born in a foreign country to US parents, they will have a Consular Report of Birth Abroad, Certification of Report of Birth, or Certificate of Citizenship.

If they were born in a foreign country, and not to US parents, you will need to verify through SAVE.

9. If an applicant presents a copy of their birth certificate issued by a U.S. State or the U.S. Department of State and it shows they were born in the United States, we can accept this documentation with their government issued ID card and assist them under CEAP?

Yes, the birth certificate verifies citizenship and the government issued ID verifies identity.

10. If the copy of the birth Certificate does not have a seal, is it accepted because it was issued by a U.S. State?

Yes, photocopies are acceptable.

11. Does "U.S. State" apply to birth certificates issued by a U.S. hospital?

You have to read the fine print on birth certificates issued by hospitals. Different states have different rules. Some states allow hospital districts (which are considered local government entities) to issue birth certificates. If the birth certificate indicates that the certificate is a souvenir or if it states that the birth will be filed with the state (or local government entity in some places), it is not acceptable and you have to get the official certificate.

12. Does "U.S. State" apply to baptismal forms (place of birth is listed) issued by the applicants' religious institution?

No. A baptismal form is not the same as a birth certificate in that the form would not necessarily be issued by a state. It can be used as secondary documentation, however.

13. Will a social security card be sufficient for verification of eligibility? Or a SS card that states "valid for work only"?

No. A SS card is not sufficient documentation for proof of status. SS cards are not acceptable as secondary documentation. Please review slides 4-6 of the SAVE presentation slides.

14. Will an elderly client, receiving SSA or SSDI, qualify for the program? Would receipt of those benefits count as verification of eligibility?

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No. The receipt of SSA and SSDI will impact the income qualification of the client, but those award letters are not on the list of acceptable documentation for proof of status; those clients would still need to go through the same process as all other applicable applicants.

15. If the government issued ID card has expired, can it still be accepted with a secondary document (Birth Certificate / Voter Registration Card)?

With the exception of the U.S. citizenship certificate, the identification must be current or have expired no more than 60 days before being presented.

16. What about voter IDs? Are those cards acceptable primary documentation for verification of eligibility? People applying for the Texas Election Identification Certification (EIC) have to present proof of citizenship; so can Subrecipients accept EIC card as proof of citizenship?

After discussion with Department Legal staff, yes, EIC can be used as primary documentation of citizenship. Here is the link to the site about EIC:

<http://www.dps.texas.gov/DriverLicense/electionID.htm>

If the documentation is not EIC (EX: voter registration certificate/card – the paper card with no picture), as identified above, then that could serve as secondary documentation, to be coupled with a government-issued ID for proof of citizenship.

17. People who are already receiving TANF/food stamps have already passed the residency test, right? So those documents are good if they can prove they are the beneficiary, right?

No. Different programs have different requirements for what is acceptable for verification. Keep in mind, there are certain categories of people that must be determined, so using TANF/food stamps, or the like, as an automatic verification is not allowable. Status for all CEAP/WAP clients must be verified following the SAVE guidelines the Department has provided.

18. When a U.S. citizen submits an application, can we and should we request and keep copies of applicant's proof of citizenship status?

Subrecipients must request documentation that will prove status, and will document in the client file what documentation was received. Be sure to protect the privacy of all applicant information at all times.

- If client is a U.S Citizen, document identification presented on the Certification Form and deliver services. Place the Certification Form in the client file and retain copies of citizenship status.
- If using the SAVE system to perform the verification:
 - If the client is verified immediately by the system, print out the results screen and place it in the client file with the Certification Form and retain copies of the documentation.
 - If a household member is not verified immediately, perform additional verification steps, print out the results screen and place in the client file with the Certification Form. Until all household members are verified the application is considered incomplete.
 - If after all verification steps are completed the client is still not verified, provide information on contacting USCIS and give a denial letter explaining their right to appeal. You **MUST** keep front and back copies of the

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documentation until the appeal is resolved; then all copies must be destroyed.

- 19. It is understood that all legal permanent residents must go through the SAVE system. However, should we keep copies of their legal permanent resident card on file?**

Subrecipients must request documentation that will prove status and will document in the client file what documentation was received. Copies MUST be kept in the client file.

- 20. We have a number of elderly clients/applicants who apply for services via an authorized representative due to their inability to take care of this on their own. In this type of case, will the authorized representative be able to sign the verification form on behalf of the elderly applicant and provide the applicant's documents. Currently we ask that the authorized rep submit a written statement (some submit power of attorney or the like) from the applicant giving them permission to apply on their behalf. Is this a process that we can continue and be in compliance with the requirements?**

Only individuals who are documented power of attorney, legal guardian, or parental control may sign on behalf of a client. Otherwise, the client must sign the form or the application is incomplete.

- 21. What options are available for verifying the status of a child under 16 who does not commonly have photo ID?**

The same requirement exists regardless of age. That is, status and identity must be established. One such practice to use for a child under 16 could be to use the birth certificate (establishes citizenship) and show the parental relationship and verify the parent's identity. If the parent is listed on the birth certificate and can be identified by the parent's government issued ID, then you can document this information to establish the child's identity. If these documents cannot be gathered then the information on slide 6 of the SAVE webinar can provide alternatives.

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SAVE Process

The Department has posted a SAVE Verification Intake that ensures the applicable rules and regulations are met: [TDHCA SAVE Applicant Certification Form for WAP and CEAP \(XLSX\)](#)

- 22. Are we expected to inform immigration and/or customs enforcement when we encounter unauthorized immigrants?**

NO! We are not a law enforcement program, so that is not required. In the same manner, if an applicant provides a document that appears to be fake, explain why that document is not acceptable and return the document to the applicant. Do not keep it or try to destroy it. That is outside the scope of this program requirement.

- 23. Please verify that there is no cost to the Subrecipient.**

At this time, the Department is paying all costs related to searches performed through the SAVE system.

- 24. Do Subrecipients have to verify eligibility for everyone in the household, or just the applicant?**

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YES — every individual in a household must be verified for eligibility by either being a US Citizen/US National or verified through the SAVE system. Only verified household members are eligible for assistance.

25. What if we complete the verification and not all household members are eligible?

The household size is to be based on that of only eligible household members. However, you must obtain income documentation for all members 18 or older, regardless of citizenship status, for calculating household income.

26. On the SAVE Applicant Certification form for WAP and/or CEAP, when an applicant answers "Yes" to the question of "Are you a US citizen?" what form of documentation will they need to provide for us to review?

If, on the SAVE Certification Form, the client says that YES they are a US citizen, then the client would have to provide proof by showing the caseworker either:

- Primary documentation = US passport; Certificate of Naturalization; Certificate of US Citizenship; etc.; (slide 3) OR
- Secondary documentation = government issued photo ID (EX: Driver's License) PLUS one of the listed documents (slides 4-6)

If the client does not have any of the primary or secondary docs, then the following link will give them information on how to go about collecting those documents (<http://www.uscis.gov/sites/default/files/USCIS/Resources/A4en.pdf>) (slide 7). This is a two page document that explains who to contact to request different types of forms/certifications regarding citizenship, which some clients will have to do.

Remember, if the client is a U.S Citizen, document identification presented on the Certification Form and, assuming the client is otherwise eligible under the applicable program, deliver services. Place the Certification Form in the client file. Subrecipients must keep copies of the documentation.

27. Applicants answering "No" to both questions are not eligible for CEAP or WAP services and I understand that; however, if we provide services with a different program/fund like CSBG do we need to issue a denial letter?

If you started a file you should issue a denial letter as a closeout action for the CEAP/WAP programs, and note the referral to programs that may assist the client.

28. In our area we hold a mass intake drive for applicants interested in applying for CEAP assistance, particularly the utility assistance component. These applicants are not coming in with a bill needing to be paid at the time of intake. We are trying to get the word out to potential clients of the SAVE requirements; however, we still anticipate that we will have many applicants who will not have the necessary documents. We are considering placing these applicants/intakes on hold until the documents are presented. What does the Department consider to be a reasonable amount of time to have these intakes on hold?

The Department does not want the clients put on hold. HHS has asked to not deny services while clients are working on meeting the requirements, assuming the client is otherwise eligible under the applicable program. If the clients are applying for future assistance, then you can determine a future date by which you must have their documentation.

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- 29. Once we conduct the initial verification in SAVE and we are prompted with “Need Additional Verification”, will we be able to input the additional information at a later date if the applicant does not have any other information that we can use at the time of intake? What will be a reasonable amount of time to place these types of cases/intakes on hold?**

The SAVE system will keep the search in the same status until you enter additional information. All of the information we have seen indicates that most of the identification documents can be received within 4-6 weeks. It is your call as to how long you give. The application is incomplete until all documents have been verified.

- 30. I am working on developing our procedures. I am unclear on whether we can provide assistance to an applicant who claims to be a U.S Citizen but does not have any documents to present. I understand we are to refer or assist them in obtaining documentation, but can we provide assistance with the current bill? Do we require them to present documentation in order to consider assistance with future months under UAC?**

Until household members are verified, the application is incomplete. You may use other unrestricted funds to assist, until verification is complete. The only exemptions are during certain emergency or crisis situations found in 10 TAC §6.3010(e): providing blankets for shelters, purchase of fans, AC, or generators; and 10 TAC §1.5 (with TDHCA waiver): transportation from disaster area to safety, or multi-family/shelter weatherization.

- 31. EXAMPLE SCENARIO: Mr. John Smith comes in to apply for CEAP and/or WAP. He was born, raised, and lived his entire life in beautiful Arlen, TX. He is 80 years old and has no idea where his birth certificate is, but he does have a Texas driver’s license with no other supporting documentation. As the caseworker, I know all this information to be true because I’ve known him my whole life. We, as the Subrecipient, have to not serve him because he can’t document his citizenship? I understand why we have to ask everyone those questions, but how on earth are our elderly clients going to respond to this?**

As with all clients, when Mr. Smith comes in, he would need to provide either primary or secondary documentation and be present to certify eligibility. Please review slides 4-6 of the SAVE presentation slides. Unfortunately, if he does not have these, he will need to obtain the proper documentation. SAVE presentation (slide 7) refers you to this link: <http://www.uscis.gov/sites/default/files/USCIS/Resources/A4en.pdf>. His application will be pending until verification of eligibility is completed.

The Department is aware this is a new requirement, and will cause some learning/growing pains with both the Subrecipient staff and the clients, but this is a rule for which we must show compliance.

- 32. USHHS has directed Texas to not delay or deny benefits 1) to a household awaiting verification; 2) because the household has applied for, but does not yet possess the required documentation, or 3) while we assist the household in obtaining such documentation.**

Does this also apply to US citizens who may have to contact an out of state entity to acquire a birth certificate? Should we provide them with assistance then give them time to get a birth certificate? What about people born in the state but don’t have the money to purchase a birth certificate in town. Or should these applicants be put on hold pending proper documentation?

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Unfortunately, until verification of eligibility is completed, the application is considered incomplete. This requirement pertains to both citizens and non-citizens.

33. Do the Household Crisis and Utility Assistance components of CEAP require program eligibility and SAVE eligibility?

Yes. Both components of CEAP require SAVE verification.

34. What is the proper process to follow when an applicant states they are a US born citizen or naturalized citizen?

- 1) Continue to ask on the application if the applicant is a US citizen or naturalized citizen.
- 2) If no, ask on the application if the applicant is a qualified alien.
- 3) If the applicant answers “no” to both of the above questions then we deny them as not being a citizen or qualified alien. Applicants who say they are a citizen or naturalized alien must prove this with either primary or secondary documentation, as cited in the webinar.

Applicants that answer no to the first question, but yes to the second question will have to provide documentation showing their claim to being a qualified alien is true and if they are not able to provide this documentation that is when our local SAVE procedures would come into play, correct? Applicants that answer “no” to being a US Citizen or naturalized citizen, but “yes” to being a qualified alien must provide documentation proving their status. The documentation must be verified through SAVE. Slide two of the SAVE webinar states that only those applicants who answer that they are NOT a citizen or national, but are a legal resident need to be verified through SAVE. SAVE is used to verify legal residency. You will use SAVE when they DO have documentation to verify.

When an applicant DOES NOT have documentation or presents expired documentation, refer the applicant to the local Field Office to obtain documentation of their immigration status. The application will be pending until verification of eligibility is completed.

35. In the case of a disconnect notice under life-threatening conditions, can a household which has had at least one member of the household who has been verified as categorically eligible, but not all other household members verified (i.e., application incomplete pending further documentation or verification via SAVE) be assisted with a one-time payment to avoid being disconnected?

It depends. Only if a household member verified as categorically eligible is the individual with the life-threatening condition.

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