

# PRWORA ELIGIBILITY VERIFICATION POLICY AND PROCEDURES

Implementation Guidance for SAVE System Access  
and Citizenship/Immigration Status Verification

**Version 1.0**

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Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), ESG –  
Rapid Unsheltered Survivor Housing (ESG-RUSH),  
HOME Investment Partnerships (HOME) Program, and HOME Investment Partnerships –  
American Rescue Plan (HOME-ARP) Program

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# 1. INTRODUCTION

## 1.1 Purpose

This document establishes comprehensive policies and procedures for implementing the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) eligibility verification requirements for Federally funded programs to include the Community Development Block Grant (CDBG/CDBG-DR) programs, the Emergency Solutions Grant (ESG) and ESG – Rapid Unsheltered Survivor Housing (ESG-RUSH) programs, HOME Investment Partnership (HOME) Program and the HOME – American Rescue Plan (HOME-ARP) program. These procedures govern verification of U.S. citizenship/U.S. nationality and qualified alien status for individual beneficiaries of direct assistance funded through these programs, including the use of the U.S. Immigration Services (USCIS) Systematic Alien Verification for Entitlements (SAVE) (or an equivalent federally approved verification system, if authorized) for noncitizen benefit recipients where required.

This guidance document provides Grantee staff, subrecipients, contractors, and program delivery partners with actionable, step-by-step procedures for:

- Determining which program activities require PRWORA eligibility verification
- Obtaining and maintaining access to the SAVE verification system
- Collecting required documentation from applicants
- Conducting verification through SAVE and interpreting system responses
- Making and documenting eligibility determinations
- Ensuring compliance with civil rights, privacy, and records retention requirements

## 1.2 Background and Regulatory Context

On November 26, 2025, the U.S. Department of Housing and Urban Development (HUD) Office of General Counsel (OGC) published a Federal Register notice (90 FR 54363) interpreting the term "federal public benefit" under PRWORA. This interpretation expressly includes CDBG, ESG, HOME, and HOME-ARP among the covered programs when assistance is provided directly to individuals, households, or family eligibility units.

**CRITICAL:** Florida is NOT a plaintiff in the multi-state litigation (State of New York v. U.S. Department of Justice) that resulted in a preliminary injunction blocking enforcement of these requirements in 20 states and the District of Columbia. Florida must implement PRWORA verification requirements immediately for all CDBG, ESG, HOME, HOME -ARP direct-benefit programs.

## 1.3 Scope and Applicability

These policies and procedures apply to all CDBG, ESG, HOME and HOME-ARP activities administered by Grantee that provide direct benefits to individuals, households, or family eligibility units, including but not limited to:

- Housing repair and replacement programs – rehabilitation, reconstruction, and replacement assistance

- Temporary Housing Assistance Benefit – interim rental and relocation assistance
- Buyout and acquisition programs where homeowners receive direct payments
- Down payment assistance and homebuyer programs
- Any other activity providing direct assistance or payments to individuals/households

**Business Assistance Note:** PRWORA verification requirements apply to business assistance programs only when the benefit is provided directly to an individual (e.g., sole proprietor grants, owner-occupied commercial property rehabilitation/buyout). Assistance to incorporated businesses, LLCs, or partnerships where the entity—not an individual—is the named beneficiary is not subject to PRWORA individual eligibility verification, though other program eligibility requirements apply.

These procedures are designed to be implemented alongside existing CDBG, ESG, HOME and HOME-ARP program eligibility requirements (income verification, ownership/occupancy documentation, etc.) and Grantee's Language Access and Accessibility Plan.

## 1.4 Verification Operating Models

The Grantee recognizes that different program delivery structures require flexibility in how PRWORA verification is conducted. This document establishes two operating models:

**Model A – Grantee-Centralized Verification:** Subrecipients and contractors conduct intake and collect documentation; Grantee (or a designated state agency partner with SAVE access) performs SAVE verification and makes final PRWORA determinations. This model ensures consistency and is recommended for programs with multiple subrecipients or contractors.

**Model B – Subrecipient-Direct Verification:** Authorized subrecipient staff are provisioned as SAVE users under the Grantee's governance framework (or through the subrecipient's own Memorandum of Agreement with USCIS), conduct verification locally, and make determinations subject to Grantee's quality assurance review. This model is appropriate for large-volume subrecipients with demonstrated capacity.

Section 8 of this document provides detailed procedures for each operating model, including handoff protocols and monitoring requirements.

## 2. LEGAL AND REGULATORY FRAMEWORK

### 2.1 Federal Statutory Authority

#### 2.1.1 Personal Responsibility and Work Opportunity Reconciliation Act of 1996

PRWORA establishes the foundational restrictions on alien eligibility for federal public benefits. The key statutory provisions are:

**8 U.S.C. § 1611 – Aliens Ineligible for Federal Public Benefits:** Establishes that, with limited exceptions, an alien who is not a "qualified alien" is not eligible for any federal public benefit. The statute defines "federal public benefit" to include any grant, contract, loan, professional license, or commercial license provided by an agency of the United States or by appropriated funds, as well as retirement, welfare, health, disability, public or assisted housing, postsecondary education, food assistance, unemployment benefit, or any other similar benefit.

**8 U.S.C. § 1641 – Qualified Alien Definition:** Defines the categories of aliens who qualify for federal public benefits:

1. Lawful Permanent Residents (LPRs) admitted under the Immigration and Nationality Act
2. Refugees admitted under INA § 207
3. Asylees granted status under INA § 208
4. Aliens whose deportation or removal has been withheld under INA § 243(h) or § 241(b)(3)
5. Aliens granted parole under INA § 212(d)(5) for at least one year
6. Conditional entrants under former INA § 203(a)(7) (prior to April 1, 1980)
7. Cuban-Haitian entrants as defined in Pub. L. 96-422
8. Certain battered aliens and their children (VAWA protections)

**CRITICAL:** Not all lawfully present aliens are "qualified aliens" under PRWORA. Holders of Temporary Protected Status (TPS), Deferred Action for Childhood Arrivals (DACA), certain nonimmigrant visa categories, and other discretionary relief statuses may be lawfully present but NOT qualified for federal public benefits.

**8 U.S.C. § 1611(b)(1)(B) – Emergency Disaster Relief Exception:** PRWORA's restrictions do not apply to "short-term, non-cash, in-kind emergency disaster relief." This exception is narrowly construed and primarily applies to immediate post-disaster assistance such as emergency shelter, food distribution, and non-cash material assistance. Long-term housing rehabilitation, reconstruction grants, and direct cash payments to homeowners do NOT qualify for this exception.

**8 U.S.C. § 1642 – Verification Requirements:** Establishes the verification framework for federal public benefits, including authorization for SAVE. This section also contains the nonprofit charitable organization exemption from verification requirements, though the underlying eligibility restrictions still apply.

## 2.1.2 HUD Guidance and Requirements

**HUD OGC Notice of Interpretation (90 FR 54363, November 26, 2025):** This notice constitutes HUD's authoritative interpretation that any grants it administers that are not explicitly governed by another statute are a "federal public benefit" subject to PRWORA when assistance is provided to individuals, households, or family eligibility units. The interpretation supersedes any prior HUD guidance on this matter.

**Baseline Regulations:** Unless excepted under 24 CFR chapters I through IX, the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, set forth in 2 CFR part 200, shall apply to Federal Awards made by the Department of Housing and Urban Development to non-Federal entities. The regulations at 24 CFR Part 570 apply to CDBG grants unless HUD has established a waiver or alternative requirement through the applicable Federal Register notice (Universal Notice, Allocation Announcement Notice, or subsequent guidance). Grantees should consult the applicable notices to identify which standard CDBG requirements have been waived or modified for their specific allocation. Where no waiver or alternative requirement applies, 24 CFR 570 provisions govern—including but not limited to record retention (24 CFR 570.502, 570.506), financial management, and program administration requirements.

## 2.2 Florida Statutory and Administrative Requirements

### 2.2.1 Florida Statutes

**F.S. § 414.095 – Public Assistance Eligibility:** Subsection (3)(c) mandates that the Department of Children and Families (DCF) participate in the SAVE program to verify document validity and noncitizen eligibility. While this statute applies directly to DCF-administered programs, it establishes Florida's commitment to SAVE verification for public benefits.

**F.S. § 282.318 – Agency Cybersecurity:** Establishes information security program requirements for state agencies that apply to systems storing PRWORA/SAVE verification data.

### 2.2.2 Florida Administrative Code

**F.A.C. 65A-1.301 – Citizenship Verification:** Governs citizenship verification for public assistance programs, requiring verification through USCIS. Key provisions include:

- Benefits shall NOT be withheld when secondary verification is pending if all other eligibility factors are met
- Noncitizens experiencing "undue hardship" shall be considered eligible while awaiting verification, subject to recoupment if later determined ineligible
- **Applicability Note:** F.A.C. 65A-1.301 governs DCF-administered public assistance programs. References to "undue hardship" eligibility pending verification do not authorize issuance of CDBG, ESG, HOME or HOME-ARP direct cash assistance or long-term housing benefits prior to completing PRWORA/SAVE verification. For CDBG, ESG, HOME and HOME-ARP programs, HUD PRWORA requirements control, and benefits shall remain pending—not approved—until verification is complete or the case is properly dispositioned per Section 5 of this policy.

**F.A.C. 60GG-2 – Information Technology Standards:** Establishes cybersecurity standards applicable to state agency information systems.

**F.A.C. 1B-24.003 – Records Retention:** Governs records retention scheduling for state agencies.

## **2.3 Anti-Discrimination Requirements**

### **2.3.1 Title VI of the Civil Rights Act**

42 U.S.C. § 2000d prohibits discrimination based on race, color, or national origin. National origin discrimination includes:

- Making assumptions about citizenship or immigration status based on surname, accent, or English proficiency
- Requiring more documentation from certain ethnic groups
- Failing to provide language assistance to Limited English Proficient applicants

### **2.3.2 Uniform Documentation Requests (Document Abuse Prevention)**

The Grantee and all subrecipients/contractors shall administer PRWORA/SAVE and all related intake/documentation practices in a nondiscriminatory manner. Staff must request only the documentation necessary to determine program eligibility and PRWORA eligibility and must apply the same documentation standards to all applicants within the same eligibility pathway.

Staff shall not:

- Request more documents than required to establish eligibility
- Demand a specific document when alternative documents are acceptable under program rules
- Reject documentation that appears reasonably genuine on its face absent a specific, articulable basis
- Treat applicants differently based on perceived citizenship status, national origin, surname, accent, English proficiency, or immigration classification

These requirements implement Grantee's civil rights obligations, including Title VI and Stafford Act § 308, and are mandatory program controls.

## **2.4 Penalties for False Statements**

18 U.S.C. § 1015(e) establishes criminal penalties for false citizenship claims made to obtain federal or state benefits. Any person who knowingly makes false statements regarding citizenship status with intent to obtain benefits faces fines and/or imprisonment up to five years. All PRWORA verification forms must include appropriate penalty warnings.

## 3. DEFINITIONS AND ACRONYMS

### 3.1 Key Definitions

Term	Definition
Additional Verification	A follow-up verification step required when SAVE returns an "Institute Additional Verification" response. The case remains pending until completed; denial is prohibited.
Applicant	An individual or entity submitting an application for assistance.
Benefit Recipient	The individual(s) who will receive the direct federal public benefit. PRWORA verification is required for each person in the defined benefit recipient/eligibility unit.
CDBG	Community Development Block Grant. A flexible federal grant program administered by HUD.
Eligibility Unit	The household, family, or recipient grouping defined by the program for PRWORA verification purposes.
Federal Public Benefit	As defined by PRWORA and interpreted by HUD OGC, a benefit triggering PRWORA eligibility restrictions when provided to individuals.
Initial Verification	The first SAVE query submitted for a noncitizen applicant using document identifiers.
LPR	Lawful Permanent Resident. An alien lawfully admitted for permanent residence ("green card" holder).
MOA	Memorandum of Agreement. The formal agreement between a user agency and USCIS governing SAVE access.
Nonqualified Alien	An alien who does not meet the definition of "qualified alien" under 8 U.S.C. § 1641.
Qualified Alien	An alien who meets one of the categories specified in 8 U.S.C. § 1641.
SAVE	Systematic Alien Verification for Entitlements. USCIS program for immigration status verification.
Subrecipient	A unit of general local government (UGLG) or other eligible entity receiving federal program funds.
USCIS	U.S. Citizenship and Immigration Services. DHS component administering the SAVE program.

### 3.2 Acronyms Reference

Acronym	Full Term
CDBG	Community Development Block Grant
CFR	Code of Federal Regulations
DACA	Deferred Action for Childhood Arrivals

DCF	Department of Children and Families (Florida)
DHS	Department of Homeland Security
EAD	Employment Authorization Document
ESG	Emergency Solutions Grant
ESG-RUSH	Emergency Solutions Grant – Rapid Unsheltered Survivor Housing
F.A.C.	Florida Administrative Code
F.S.	Florida Statutes
HOME	HOME Investment Partnerships Program
HOME- ARP	HOME Investment Partnerships – American Rescue Plan
HUD	U.S. Department of Housing and Urban Development
INA	Immigration and Nationality Act
LEP	Limited English Proficient
LPR	Lawful Permanent Resident
MOA	Memorandum of Agreement
OGC	Office of General Counsel
PII	Personally Identifiable Information
PRWORA	Personal Responsibility and Work Opportunity Reconciliation Act of 1996
QA	Quality Assurance
SAVE	Systematic Alien Verification for Entitlements
TPS	Temporary Protected Status
UGLG	Unit of General Local Government
USCIS	U.S. Citizenship and Immigration Services
VAWA	Violence Against Women Act

## 4. POLICY STATEMENTS AND CORE PRINCIPLES

The following policy statements establish the foundational principles governing PRWORA eligibility verification for the Grantee's CDBG, ESG, ESG-RUSH, HOME and HOME-ARP funded programs. These principles are non-negotiable compliance requirements.

### 4.1 Uniform, Nondiscriminatory Administration

PRWORA eligibility verification shall be applied uniformly to all applicants in the defined benefit recipient class. Staff shall NOT:

- Request immigration documentation selectively based on name, accent, appearance, national origin, or perceived immigration status
- Require more documentation from applicants of certain ethnicities or national origins
- Make assumptions about citizenship or qualified alien status without proper documentation and verification
- Deviate from standardized intake scripts and document checklists

Verification requests and decision rules shall be documented and applied consistently across all intake locations, subrecipients, and contractors.

### 4.2 Data Minimization and Privacy Safeguards

The Grantee shall collect only the information necessary to determine PRWORA eligibility. Staff shall:

- Limit document collection to the minimum required for verification purposes
- Restrict access to PRWORA verification documentation to authorized personnel only
- Store verification outputs in secure, access-controlled systems consistent with Florida cybersecurity requirements
- Apply F.S. § 119.071(5)(f) confidentiality protections to all PRWORA verification records
- Use secure transmission protocols for all handoffs of verification documentation between entities

### 4.3 No Denial on Unresolved Verification

**CRITICAL:** If SAVE returns a response prompting "Institute Additional Verification" or indicates that additional steps are required, the case shall remain pending until additional verification is completed. Staff shall NOT deny an application based solely on an unresolved initial SAVE response. Do NOT issue award until verification completes.

This principle recognizes that initial SAVE responses may require additional research due to data entry errors, records discrepancies, or database matching issues. Agencies are prohibited from denying benefits until the complete verification process is exhausted. An award shall NOT be issued until verification is complete.

#### 4.4 File-Based Documentation

Each PRWORA eligibility determination shall be fully documented in the case file with auditable evidence. Required documentation includes:

- Activity classification (covered, exempt, or non-direct-benefit)
- Eligibility unit definition for the specific activity
- Applicant notice provision (date, method, language)
- Identity and citizenship/immigration documentation collected
- SAVE verification outputs (initial and additional verification, if applicable)
- Final eligibility determination with signature and date
- Supervisor review for denials

#### 4.5 Meaningful Access and Accessibility

PRWORA verification procedures shall be integrated with Grantee's Language Access and Accessibility Plan. This includes:

- Providing interpretation services for Limited English Proficient applicants
- Translating vital documents into regularly encountered languages
- Providing accessible formats for persons with disabilities
- Training intake staff on language access protocols

#### 4.6 Activity Classification Framework

All federal program activities (applicable programs) shall be classified into one of three categories for PRWORA purposes:

Category	Description	PRWORA Verification Required?
A	PRWORA-Covered Direct Benefit: Activity provides direct assistance to individual/household/family eligibility unit	YES – Full verification required for each person in eligibility unit
B	Exempt Under Statutory Exception: Activity qualifies for documented PRWORA exception	NO – Document exception and retain memo in program file
C	Not a Direct Benefit: Activity provides assistance to entities rather than individuals/households	NO – Document rationale; no individual verification

Activity classification must be completed and documented prior to opening intake.

#### 4.7 REAL ID Is Not PRWORA Eligibility Evidence

**CRITICAL:** A Florida driver license or state identification card (including REAL ID-compliant credentials) may be accepted as proof of identity, but shall NOT be treated as proof of PRWORA eligibility. PRWORA eligibility requires separate verification of U.S. citizenship/nationality or qualified alien status.

This distinction is critical because:

- REAL ID reflects a state licensing determination for credential issuance, not federal benefit eligibility
- Some noncitizens who are lawfully present for licensing purposes (and may hold REAL ID credentials) are NOT qualified aliens under PRWORA
- Examples include certain nonimmigrant visa holders, TPS recipients, and DACA recipients

Staff shall accept REAL ID credentials for identity verification purposes and continue to complete separate citizenship/qualified alien verification per these procedures.

## 5. ROLES AND RESPONSIBILITIES

### 5.1 Grantee Roles

#### 5.1.1 Program Manager

##### Primary Responsibilities:

- Approve activity-level PRWORA coverage/exemption determinations
- Ensure PRWORA procedures are embedded in program guidelines, contractor manuals, and subrecipient requirements
- Coordinate with HUD on the interpretation of requirements, responses to questions, and on updated federal or state guidance
- Oversee operating model selection for each program (centralized vs. distributed verification)
- Approve updates to PRWORA policies and procedures

#### 5.1.2 SAVE Agency Administrator

##### Primary Responsibilities:

- Serve as Grantee's primary point of contact with USCIS for SAVE program matters
- Manage SAVE enrollment, Memorandum of Agreement execution, and system access
- Provision and deprovision user accounts following least-privilege principles
- Maintain onboarding/offboarding log for all SAVE users
- Track and ensure completion of required SAVE training for all users
- Monitor SAVE audit logs and access patterns
- Ensure security controls align with Florida cybersecurity requirements and SAVE MOA terms
- Manage billing reconciliation with USCIS

#### 5.1.3 Intake Specialist/Case Manager

##### Primary Responsibilities:

- Provide uniform PRWORA notice to all applicants using approved scripts
- Collect required identity and citizenship/immigration documentation using standardized checklists
- Upload documentation securely to case management system
- Flag cases requiring noncitizen verification for Eligibility Specialist review
- Coordinate interpretation and translation services as needed
- Document all applicant interactions related to PRWORA verification

#### 5.1.4 Eligibility Specialist (PRWORA Determination Staff)

##### Primary Responsibilities:

- Define the eligibility unit for each case based on program requirements
- Review citizenship documentation for completeness and facial validity
- Conduct SAVE verification for noncitizen applicants (if authorized)
- Interpret SAVE responses and determine PRWORA eligibility category
- Initiate additional verification when prompted by SAVE
- Complete PRWORA determination checklist for each case
- Prepare written determination notices
- Escalate complex cases and all denials to Supervisor

### **5.1.5 Supervisor/Compliance Officer**

#### **Primary Responsibilities:**

- Review and approve all PRWORA eligibility denials before issuance
- Review complex determinations and borderline cases
- Confirm that additional verification was completed when prompted by SAVE
- Conduct quality assurance sampling per established protocols
- Identify patterns indicating systemic issues or training needs
- Implement corrective actions as needed

### **5.1.6 Records Management Liaison/Privacy Officer**

#### **Primary Responsibilities:**

- Ensure PRWORA records retention complies with F.A.C. 1B-24.003 and federal grant requirements
- Apply F.S. § 119.071(5)(f) confidentiality protections to PRWORA documentation
- Review public records requests for PRWORA-related records
- Coordinate with legal staff on disclosure and redaction determinations

## **5.2 Subrecipient and Contractor Roles**

When subrecipients or contractors perform intake, case management, or deliver direct-benefit assistance, Grantee shall flow down PRWORA requirements through written agreements.

### **5.2.1 Under Model A (Grantee-Centralized Verification)**

Subrecipients and contractors:

- Provide uniform PRWORA notice using Grantee-approved scripts
- Collect identity and citizenship/immigration documentation per approved checklists
- Transmit documentation to Grantee using secure protocols
- DO NOT make PRWORA eligibility determinations
- Await verification results from Grantee before proceeding with award/commitment
- Comply with auditing/monitoring by Grantee's internal auditor

### **5.2.2 Under Model B (Subrecipient-Direct Verification)**

Authorized subrecipients:

- Establish SAVE access through own MOA with USCIS or through Grantee's agreement
- Designate SAVE Agency Administrator and trained users
- Conduct SAVE verification following Grantee procedures
- Make eligibility determinations using approved checklists
- Report all determinations to Grantee for QA review
- Maintain case files and audit trails per Grantee requirements
- Submit to Grantee monitoring

## 6. SAVE SYSTEM ACCESS AND ENROLLMENT

### 6.1 Overview of SAVE

The Systematic Alien Verification for Entitlements (SAVE) program is an intergovernmental information-sharing program operated by U.S. Citizenship and Immigration Services (USCIS) that enables authorized benefit-granting agencies to verify immigration status of benefit applicants. SAVE provides access to immigration records maintained by the Department of Homeland Security. SAVE is Grantee's default verification system for PRWORA-covered, direct-benefit activities involving noncitizen benefit recipients.

PRWORA's verification statute (8 U.S.C. § 1642) establishes a federal verification framework and directs the Attorney General to issue verification guidance; it does not mandate SAVE as the only permissible tool. Grantee will use SAVE unless (1) a federally approved equivalent verification system is available and applicable, and (2) Grantee documents the basis for using that equivalent system (including any HUD or federal direction/approval applicable to the grant).

Documentary proof remains the primary method for establishing U.S. citizenship/U.S. nationality at intake and file review. Consistent with these procedures, no SAVE query is required for U.S. citizens/nationals. If SAVE is temporarily unavailable (e.g., system outage) or Grantee is not yet provisioned for SAVE, Grantee may proceed with intake and other eligibility processing, but will not issue an award/commitment to any noncitizen benefit recipient in a PRWORA-covered eligibility unit until verification is finalized through SAVE or an approved equivalent verification system.

**Scope Note (Nonprofit Partners):** These SAVE procedures apply to Grantee and any designated governmental verifying entity conducting PRWORA verification for PRWORA-covered direct benefits. When nonprofit partners are involved, PRWORA provides a nonprofit charitable organization exception from PRWORA verification requirements (8 U.S.C. § 1642(d)); see Section 8.4 for the required delivery model controls and responsibility allocation.

#### 6.1.1 What SAVE Verifies

SAVE verifies immigration status information, including:

- Immigration status classification (e.g., LPR, refugee, asylee, parolee)
- Employment authorization
- Dates of status validity
- Country of Citizenship

**CRITICAL:** SAVE verifies immigration status but does NOT determine PRWORA eligibility. The user agency must map the verified status to PRWORA categories (qualified alien or nonqualified alien) based on 8 U.S.C. § 1641.

## 6.1.2 Access Methods

Method	Description	Best For
Web Browser	Online portal accessed through standard web browser. Individual case submission with real-time responses.	Most users. Recommended for agencies processing fewer than 1,000 verifications per month.
REST API	Web services integration for direct system-to-system queries. Requires IT development resources.	High-volume agencies with case management system integration capabilities.
Bulk Upload	Batch processing of multiple verification requests (up to 1GB per upload). Results returned asynchronously.	Agencies with periodic bulk verification needs.

**Source Documentation Note:** The procedures in this document are based on publicly available USCIS guidance, federal regulatory requirements, and the SAVE system's published specifications, including the SAVE Tutorial (revised July 17, 2025) and SAVE User Reference Guide. Upon execution of the Memorandum of Agreement with USCIS, Grantee will receive access to the official SAVE Program Guide containing detailed system workflows, response code definitions, and operational procedures. Staff should treat USCIS-provided materials as authoritative for system-specific operations, and this policy should be updated as necessary to align with current USCIS guidance.

## 6.2 SAVE Enrollment Process

Before accessing SAVE, Grantee (or subrecipients operating under Model B) must complete the enrollment process with USCIS.

### 6.2.1 Step 1: Determine Enrollment Authority

Review the legal authority requiring PRWORA verification and authorizing use of SAVE (or an equivalent federally approved verification system). For Grantee CDBG, ESG, HOME and HOME-ARP direct-benefit programs, the authority includes:

- 8 U.S.C. § 1642 (PRWORA verification provisions) and the Attorney General's interim verification guidance (62 FR 61344, Nov. 17, 1997), establishing verification and nondiscrimination principles for federal public benefits.
- HUD OGC Notice of Interpretation (90 FR 54363, Nov. 26, 2025), confirming that CDBG, ESG, HOME and HOME-ARP is a covered "federal public benefit" when assistance is provided directly to individuals, households, or family eligibility units.

### 6.2.2 Step 2: Submit Online Registration Application

Navigate to the USCIS SAVE Prospective User Agency page (<https://www.uscis.gov/save/prospective-user-agencies>) and complete the online registration application. Required information includes:

- Agency name, address, and contact information
- Agency type (state agency, local government, etc.)
- Benefits to be verified

- Legal authority requiring verification (cite 90 FR 54363 and PRWORA)
- Estimated annual verification volume
- Designated Point of Contact (name, email, phone)
- Desired access method (web browser, API, batch)

### **6.2.3 Step 3: USCIS Review and Contact**

USCIS will review the registration application and contact the designated Point of Contact to:

- Verify agency information and authority
- Discuss SAVE capabilities and requirements
- Clarify technical requirements for selected access method
- Provide Memorandum of Agreement (MOA) for execution

Typical review timeline: 2-4 weeks from application submission.

### **6.2.4 Step 4: Execute Memorandum of Agreement**

The MOA is a binding agreement between the user agency and USCIS that establishes:

- Authorized uses of SAVE information
- User responsibilities for data security and privacy
- Training requirements for SAVE users
- Audit and oversight provisions
- Fee structure and billing procedures
- Incident reporting requirements

### **6.2.5 Step 5: Complete Required Training**

Before accessing SAVE, all designated users must complete USCIS-provided training covering:

- SAVE system functionality and navigation
- Data entry requirements and best practices
- Response code interpretation
- Additional verification procedures
- Privacy and data security requirements
- Applicant rights and record correction procedures

Training is available online through the SAVE Learning Center. The SAVE Agency Administrator must retain training completion certificates for all users.

### **6.2.6 Step 6: User Account Provisioning**

After MOA execution and training completion, the SAVE Agency Administrator (or other authorized SAVE Super User or Supervisor User) provisions individual user accounts:

1. Add User Account:
  - a) From the navigation menu, select the Agency drop-down and click Users.

- b) Select the + Add User button.
  - c) Enter the required information on the Add New User Account page, including the new user's email address, user role, Department, and Group. Click Next.
2. User ID Assignment:
- a) SAVE will check whether the email address is associated with an existing SAVE user.
  - b) On the User Account Information page, SAVE will auto-populate a new User ID.
  - c) The Super User or Supervisor User can accept the User ID or enter a new one (User ID must contain 8 alphanumeric characters).
  - d) Click Continue.
3. Activation and Login:
- a) The new user will receive an email with an activation link.
  - b) To activate and access SAVE, the user must sign in (or create an account) through Login.gov and continue to SAVE.
  - c) The new user account status will change to Active upon the new user signing in.
4. Administrator Verification and Logging:
- a) The SAVE Agency Administrator verifies successful sign-in and correct role/Department/Group assignment and records the activation in the SAVE access/onboarding log.

## 6.3 SAVE Costs and Billing

Effective April 1, 2025, USCIS eliminated all SAVE transaction charges for state, local, tribal, and territorial government agencies. Grantee incurs no per-verification fees for SAVE usage. Only federal agencies are subject to SAVE transaction charges. This policy applies to all verification types, including initial verification and additional verification requests.

## 6.4 Security Requirements

Grantee shall implement security controls for SAVE access and data consistent with:

- SAVE MOA security provisions
- F.S. § 282.318 (Florida agency cybersecurity requirements)
- F.A.C. 60GG-2 (Florida IT standards)

### 6.4.1 Minimum Security Controls

- Role-based access control with least-privilege provisioning
- Multi-factor authentication for all SAVE users
- Encryption in transit (TLS/SSL) and at rest for stored SAVE data
- Audit logging of all SAVE access and queries
- Regular access reviews and prompt deprovisioning of departed staff

- Secure workstations (locked when unattended, no shared accounts)
- Incident reporting procedures for suspected unauthorized access

## 7. VERIFICATION PROCEDURES

This section establishes the step-by-step procedures for conducting PRWORA eligibility verification. These procedures apply to all Category A (PRWORA-covered direct benefit) activities.

### 7.1 Procedure 1: Activity-Level PRWORA Applicability Determination

**Objective:** Determine which activities require PRWORA eligibility verification and document the basis.

**Timing:** Before opening intake for any direct benefit activity<sup>1</sup>.

**Responsible Party:** Program Manager

#### Step 1.1: Inventory All Funded Activities

For each CDBG, HOME, HOME-ARP, ESG and ESG-RUSH direct benefit program or activity, document:

- Activity name and IDIS activity setup ID (if available)
- Type of assistance (rehabilitation, reconstruction, cash grant, rental assistance, etc.)
- Who receives the benefit (individual homeowner, household, tenant, entity)
- Delivery mechanism (direct payment, construction services, reimbursement, in-kind)

#### Step 1.2: Classify Each Activity

Apply the A/B/C classification framework:

##### Category A – PRWORA-Covered Direct Benefit Examples:

- Rehabilitation, reconstruction, and replacement grants to homeowners
- Temporary Housing Assistance Benefit (rental payments)
- Buyout payments to property owners
- Down payment and homebuyer assistance
- URA relocation payments to displaced households

##### Category B – Exempt Under Statutory Exception:

- Emergency shelter provision (non-cash, in-kind, short-term)
- In-kind material distribution (tarps, cleanup supplies)

**CRITICAL:** The emergency disaster relief exception is narrow. Most CDBG, ESG, HOME and HOME-ARP housing assistance is NOT exempt. Document the specific exception and legal basis before classifying any activity as Category B.

<sup>1</sup> For programs with applications already in process—whether in intake, under review, conditionally approved, partially disbursed, or approaching closeout—Appendix A provides stage-specific implementation guidance. This ensures PRWORA compliance is achieved without requiring retroactive verification of benefits issued prior to the implementation effective date.

**Category C – Not a Direct Benefit Examples:**

- Infrastructure repair grants to UGLGs
- Emergency Shelter Operations (ESG)
- Public facilities improvements
- Economic development loans to businesses (not individuals)
- Planning and administration activities

**Step 1.3: Document Classification**

Complete a PRWORA Activity Classification Memorandum containing:

- Activity name and DRGR ID
- Classification (A, B, or C)
- Rationale for classification
- Eligibility unit definition (for Category A)
- Statutory exception citation (for Category B)
- Approval signature and date

**Step 1.4 Implementation for Active Programs**

This policy establishes PRWORA verification procedures for CDBG, ESG, ESG-RUSH, HOME and HOME-ARP programs administered by Grantee. Programs initiating intake after the effective date of HUD’s notice on PRWORA applicability shall implement these procedures from the outset per the sequential procedures in Sections 5 through 12.

**Grantees and subrecipients with active caseloads should proceed directly to Appendix A** to identify applicable requirements based on current program status before implementing the procedures in this policy.

**7.2 Procedure 2: Define Eligibility Unit**

**Objective:** Identify the specific individual(s) requiring PRWORA verification for each activity type.

**Timing:** During activity classification, before intake opens.

**Responsible Party:** Program Manager

**Step 2.1: Define Who Is the Benefit Recipient**

For PRWORA purposes, the **benefit recipient** is the individual or entity to whom the federal benefit is awarded—typically the grantee or signatory on the grant agreement. This may differ from program-specific eligibility definitions (e.g., "applicant," "household," "occupant"). PRWORA verification applies to **individuals receiving federal benefits**, not entities.

**Activity Type Reference Table**

Activity Type	Benefit Recipient (Verify Under PRWORA)
<b>OWNER-OCCUPIED PROGRAMS</b>	

Owner-occupied rehabilitation/reconstruction/replacement	Owner(s) of record as reflected on property title at time of application. Verify all individuals on title who will sign the grant agreement.
Down payment/homebuyer assistance	All individuals on the purchase contract and/or mortgage who will receive the benefit.
Buyout/acquisition	All owners on title receiving payment. If title held by entity, see Special Title Situations below.
<b>RENTAL PROGRAMS</b>	
Tenant-Based Rental Assistance (e.g., THAB)	Head of household or leaseholder. Additional adult household members if program policy defines them as recipients.
Rental property rehabilitation (landlord receives funds)	Landlord. If individual: verify. If entity (LLC, corporation, partnership): PRWORA does not apply—document in file.
Landlord incentive/signing bonus	Landlord. If individual: verify. If entity: PRWORA does not apply.
<b>OTHER PROGRAM TYPES</b>	
URA relocation assistance	Displaced person(s) receiving relocation payments.
Infrastructure/public facilities	PRWORA does not apply. Benefit flows to public/community, not individuals.

### Special Title Situations (Owner-Occupied Programs)

For owner-occupied programs, the benefit recipient is the owner of record. However, certain title structures require specific treatment:

Title Holder Type	PRWORA Verification	Action
Individual(s)	Required	Verify all individuals on title who sign grant agreement
Revocable living trust (individual as trustee/beneficiary)	Required	Verify the individual trustee(s) and/or beneficiary(ies)
Irrevocable trust	Consult legal counsel	Determine appropriate verification based on trust structure
Entity (LLC, corporation, partnership)	Not required	PRWORA applies to individuals, not entities. Document in file.
Life estate	Required	Verify the life tenant (holder of present possessory interest)
Title held by non-occupant (e.g., parent owns, adult child occupies)	Required	Verify the title holder—the individual receiving the benefit—regardless of occupancy

**KEY DISTINCTION:** Occupancy is a program eligibility requirement, not a PRWORA requirement. PRWORA verification applies to the individual receiving the federal benefit (title holder/grantee), regardless of who occupies the property.

### Mixed Benefit Scenarios

Some programs may have multiple benefit recipients within a single project:

- Rental rehabilitation where landlord receives rehab funds AND tenant receives rental subsidy: Apply PRWORA to each individual benefit recipient independently.
- Buyout with relocation: Verify seller (buyout payment recipient) and displaced occupant (relocation payment recipient) separately.
- Owner-occupied with tenant relocation: Verify owner (rehab recipient) and any tenants receiving URA relocation assistance separately.

**ENTITY DOCUMENTATION:** When PRWORA does not apply because the benefit recipient is an entity, document this determination in the case file: "PRWORA verification not required. Benefit recipient is [ENTITY NAME], a [LLC/corporation/partnership]. PRWORA applies to individuals, not entities. Documented [DATE] by [STAFF]."

### Step 2.2: Document in Program Guidelines

Include the eligibility unit definition in program guidelines and intake materials. Staff must verify PRWORA eligibility for EACH person in the defined eligibility unit, not just the primary applicant.

## 7.3 Procedure 3: Standardized Intake and Applicant Notice

**Objective:** Provide consistent notice and apply uniform verification requests to all applicants.

**Timing:** At initial application/intake.

**Responsible Party:** Intake Specialist/Case Manager

### Step 3.1: Provide Uniform PRWORA Notice

All applicants must receive written notice of PRWORA verification requirements at the point of application. This notice may be delivered through any of the following methods:

- Incorporated into the program application form (with applicant signature serving as acknowledgment)
- Included as a required disclosure in the application packet with separate signature acknowledgment
- Provided as a standalone notice with documented receipt

Regardless of delivery method, the notice must include the following elements (see Appendix F for standardized language):

- Explanation that federal law requires verification of citizenship or qualified alien status
- Statement that the same verification is required of all applicants

- Information about what documents will be needed
- Statement that pending verification will not result in automatic denial
- Penalty warning for false statements (18 U.S.C. § 1015)

**Program-Level Documentation:** Maintain the approved notice template and documentation of the delivery method in program files.

**Case-Level Documentation:** The case file must contain evidence that the applicant received the notice (e.g., signed application form containing notice language, signed acknowledgment, or equivalent).

### Step 3.2: Use Standard Intake Script

Use the approved intake script (Appendix F) or other program-specific intake script when collecting PRWORA information. If using a program-specific script, the script should ensure:

- All applicants receive identical questions in the same order
- Documentation requests are consistent and not based on perceived status
- Audit trail demonstrates nondiscriminatory administration

## 7.4 Procedure 4: Documentation Collection

**Objective:** Collect documentation sufficient to verify PRWORA eligibility for each person in the eligibility unit.

**Timing:** During intake, as early as possible in the application process.

**Responsible Party:** Intake Specialist/Case Manager

### Step 4.1: Collect Identity Documentation

For each person in the eligibility unit, collect at least one identity document:

- Florida driver license or state identification card (including REAL ID)
- U.S. passport or passport card
- Military identification
- Foreign passport with photo
- Other government-issued photo identification

**CRITICAL:** Identity documents verify WHO the person is. They do not, by themselves, establish PRWORA eligibility. Separate citizenship/immigration documentation is required.

### Step 4.2: Determine Citizenship/Immigration Status Claim

Ask each person in the eligibility unit: "Are you a U.S. citizen or U.S. national?"

- If YES → Proceed to Step 4.3 (Citizenship Documentation)
- If NO → Proceed to Step 4.4 (Immigration Documentation)

### Step 4.3: Collect Citizenship/U.S. National Documentation

For each person claiming U.S. citizenship or U.S. national status, collect one of the following (see Appendix C for complete hierarchy):

#### Primary Evidence (Stand-Alone – Establishes Both Identity and Citizenship):

- U.S. passport or passport card (current or expired if issued without limitation)
- Certificate of Naturalization (N-550 or N-570)
- Certificate of U.S. Citizenship (N-560 or N-561)

#### Secondary Evidence (Requires Separate Identity Document from Step 4.1):

- U.S. public birth certificate (certified copy from vital records office)
- Consular Report of Birth Abroad (FS-240, DS-1350, or FS-545)
- U.S. military records showing U.S. birthplace

Retain a copy of the citizenship documentation in the case file. No SAVE verification is required for U.S. citizens/nationals.

### Step 4.4: Collect Immigration Documentation (Non-Citizens)

For each person who is not a U.S. citizen/national, collect immigration documentation sufficient to initiate SAVE verification:

Document Type	SAVE Identifier	Notes
Permanent Resident Card (I-551)	A-Number	Likely qualified alien (LPR)
Employment Authorization Document (I-766)	A-Number, Card Number, or I-797 Receipt Number	May or may not be qualified alien; requires SAVE
Arrival/Departure Record (I-94)	I-94 Number	Status depends on classification code
Refugee Travel Document	A-Number	Likely qualified alien (refugee/asylee)
I-797 Notice of Action	Receipt Number	May indicate pending or approved status change
Foreign Passport with Visa/Stamp	I-94 Number or Visa Number	Status depends on visa classification

### Step 4.5: Handle Disaster-Related Document Loss

If an applicant states that disaster-related loss prevents immediate production of documentation:

1. Document the applicant's statement and the reason (disaster loss) in the case file
2. Provide a written "Document Recovery Options" information sheet
3. Applicants have 60 calendar days from the date of the documentation request to provide required citizenship/immigration documentation. Extensions may be approved by Grantee Eligibility Specialist or Supervisor for Centralized/Hybrid models and Subrecipient Supervisor (not the case manager assigned to the case) for Delegated

models. A single 30-day extension may be granted for good cause. Extensions beyond 90 days total require Grantee Program Manager approval. Good cause includes:

- Document replacement delays from issuing agencies (USCIS, SSA, Vital Records)
  - Disaster-related displacement affecting mail delivery or document retrieval
  - Medical emergency or hospitalization
  - Other circumstances beyond the applicant's control, documented in the case file
4. Continue processing other eligibility requirements in parallel
  5. Do not issue final award until PRWORA documentation is complete

Apply this approach uniformly to all applicants claiming disaster-related document loss.

## 7.5 Procedure 5: SAVE Verification (Non-Citizens)

**Objective:** Verify immigration status and determine PRWORA eligibility category for each non-citizen in the eligibility unit.

**Timing:** After collecting immigration documentation, before award/commitment.

**Responsible Party:** Eligibility Specialist (PRWORA Determination Staff)

### Step 5.1: Confirm Eligibility Unit Member

Before running SAVE, confirm that the individual is part of the defined eligibility unit for the activity. Do not run SAVE verification for non-recipients (data minimization principle).

### Step 5.2: Create SAVE Case

Access SAVE and create a new verification case. Enter the following information exactly as it appears on the applicant's immigration documentation:

- Last name
- First name
- Date of birth
- At least one numeric identifier: A-Number, I-94 Number, SEVIS ID, Naturalization/Citizenship Certificate Number, Card Number or I-797 Receipt Number, Visa Number, or Social Security Number (if no other identifier available)

**CRITICAL:** Data entry accuracy is critical. Errors in name spelling, date of birth, or numeric identifiers may result in "No Records Found" responses requiring resubmission.

### Step 5.3: Submit Initial Verification

Submit the verification request. Initial verification typically returns an automated response within seconds.

### Step 5.4: Save Verification Output

Save the initial verification response to the case file. Required documentation:

- PDF export or screenshot of response
- Applicant name or unique case ID
- SAVE case number
- Date and time of query
- Complete response text including status classification

### Step 5.5: Interpret Response

Response types include:

- Verified status returned → Proceed to PRWORA category determination (Section 7.6)
- Institute Additional Verification → Initiate additional verification (Section 7.6)
- Resubmit with More Information → Correct data entry and resubmit
- No Records Found → Issue discrepancy notice and allow record correction

### Step 5.6: Photo Tool Verification (If Enabled)

If Grantee has enabled the Photo Tool feature in its MOA, SAVE will display a photograph from DHS records during initial verification when available. Staff must compare this photo against the applicant's immigration document.

#### Photo Tool Response Options:

When the Photo Match screen displays, staff must select the option that applies based on what SAVE displays and what the agency has available for comparison:

- “No photo displayed” = SAVE did not display a photo in the Photo Match screen.
- “No photo available” = SAVE displayed a photo, but the agency does not have an available/usable photo on the applicant’s document to compare against the SAVE photo (e.g., the applicant’s document has no photo, the photo is missing, or the photo is not usable for comparison).

Staff Selection	System Response	Required Action
"Yes, this photo matches"	SAVE returns Initial Verification Response	Proceed to Step 5.5
"No, this photo does not match"	SAVE instructs additional verification	MANDATORY: Upload the applicant's document(s) and submit the case for additional verification; do not finalize PRWORA eligibility until SAVE returns a final response
"No photo displayed"	SAVE returns Initial Verification Response	Proceed to Step 5.5; document that SAVE did not display a photo

"No photo available"	SAVE returns Initial Verification Response	Proceed to Step 5.5; document that SAVE displayed a photo but the applicant's documentation did not include an available/usable photo for comparison
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**Mandatory Escalation for Photo Mismatch:** When staff select "No, this photo does not match," additional verification is required before SAVE will provide a final response. This is not optional. Staff must upload a legible copy of the applicant's immigration document (front and back) and submit for additional verification before proceeding.

A photo mismatch does not automatically indicate fraud. It may result from updated photos in DHS records, document age, or data entry variations. However, the mismatch requires USCIS review before verification can be finalized.

## 7.6 Procedure 6: SAVE Response Handling

**Objective:** Correctly interpret and act on SAVE verification responses.

**Responsible Party:** Eligibility Specialist

### Step 6.1: Verified Status Returned

When SAVE returns a verified status, the response will include the applicant's immigration status classification. The Eligibility Specialist must:

1. Document the verified status classification in the case file
2. Map the status to PRWORA categories using the chart in Appendix D
3. Determine whether the individual is a Qualified Alien or Nonqualified Alien
4. Document the PRWORA eligibility determination with rationale

### Step 6.2: Institute Additional Verification

**CRITICAL:** If SAVE returns "Institute Additional Verification," the case remains pending. Staff shall NOT deny the application based on the initial response. Additional verification is MANDATORY.

When additional verification is prompted:

1. Submit additional verification request within 1 business day of receiving the SAVE prompt, per Grantee internal processing standards
2. Mark the case as "PRWORA Verification Pending" in the case management system
3. Continue processing other eligibility requirements in parallel
4. Do NOT issue award/commitment until PRWORA verification is final

5. Monitor for additional verification response. USCIS response times vary; consult the USCIS SAVE “Verification Response Times” resource for current estimates and follow internal case-aging controls until a final SAVE response is received
6. Save the additional verification confirmation and final response to the case file

### **Step 6.3: Resubmit with More Information**

When SAVE requests additional identifiers or indicates data entry issues:

1. Review the SAVE response for specific missing information
2. Contact the applicant to obtain additional document identifiers if needed
3. Correct data entry errors (verify name spelling, date format, identifier accuracy)
4. Resubmit the verification request
5. Document all resubmission attempts and reasons in the case file

### **Step 6.4: No Records Found/Mismatch**

When SAVE cannot match the applicant's information:

1. Issue a Verification Discrepancy Notice to the applicant (see Appendix F)
2. Provide specific information about what data elements could not be matched
3. Provide USCIS instructions for correcting records
4. Applicants have 60 calendar days from the date of the documentation request to provide required citizenship/immigration documentation. Extensions may be approved by Grantee Eligibility Specialist or Supervisor for Centralized/Hybrid models and Subrecipient Supervisor (not the case manager assigned to the case) for Delegated models. A single 30-day extension may be granted for good cause. Extensions beyond 90 days total require Grantee Program Manager approval. Good cause includes:
  - a) Document replacement delays from issuing agencies (USCIS, SSA, Vital Records)
  - b) Disaster-related displacement affecting mail delivery or document retrieval
  - c) Medical emergency or hospitalization
  - d) Other circumstances beyond the applicant's control, documented in the case file
5. Re-run verification after applicant provides corrected documentation or after DHS record correction

### **Step 6.5: SSN-Only Verification Limitations**

When a SAVE case is created using only a Social Security Number (without an immigration enumerator), SAVE compares information against Social Security Administration (SSA) records rather than DHS immigration records. SSN-only cases have significant procedural limitations.

SAVE CaseCheck and User Guide emphasize enumerators; SSN-only queries are limited and should be used only when citizenship is being verified against SSA data and no immigration identifier is available.

#### **SSN-Only Response Codes:**

- "United States Citizen (Per SSA Record)" — Verification complete; citizenship confirmed via SSA records
- "Deceased (Per SSA Record)" — SSA records indicate the individual is deceased; refer to Program Integrity
- "No Record Found with SSA" — SSA cannot locate a matching record; case must be closed and resubmitted
- "Immigration Enumerator Required" — SSA located a record but SAVE requires an immigration enumerator

**Critical Limitation:** SAVE cannot conduct additional verification for SSN-only cases. If an SSN-only case receives any response other than confirmed citizenship, staff cannot escalate the case. Staff must:

1. Close the existing SAVE case
2. Contact the applicant to request immigration documentation containing a valid enumerator (A-Number, I-94, USCIS Receipt Number, etc.)
3. Create a new SAVE case using the immigration enumerator

If the applicant cannot provide immigration documentation, follow procedures in Section 7.7 for eligibility determination.

### Step 6.6: Case Closure Requirements

All SAVE cases must be closed upon completion of verification, regardless of outcome.

**Automatic Case Closure:** SAVE automatically closes some cases after 240 days. Staff should not rely on automatic closure. Close cases promptly upon:

- Completion of verification (citizenship/immigration status confirmed)
- Applicant withdrawal from the program
- Determination that the applicant is ineligible
- Case resubmission with corrected information (close the original case first)

#### Case Closure Best Practices:

- Close cases within 5 business days of receiving a final SAVE response
- Document the verification outcome in the applicant's program file before closing
- For cases requiring resubmission, close the original case before creating the new case to avoid duplicate case blocks

**Duplicate Case Prevention:** SAVE blocks duplicate case creation when an open case exists with identical applicant information. If staff receive an "Unable to Create Case" response, locate the original case and continue verification on that case.

## 7.7 Procedure 7: PRWORA Eligibility Determination

**Objective:** Issue final PRWORA eligibility determination for each applicant.

**Responsible Party:** Eligibility Specialist (with Supervisor review for denials)

### Step 7.1: Verify Documentation Completeness

Before proceeding to eligibility determination, confirm that all required documentation has been received and reviewed for each person in the eligibility unit.

**Guidance Tool:** Staff should use the PRWORA Eligibility Determination Checklist (Appendix E) as a guide to ensure all required elements are present. The checklist is an operational tool to support consistent review; it is not a regulatory requirement.

Confirm the following elements are complete:

- Activity is classified (A/B/C) with documented rationale
- Eligibility unit is defined and documented
- PRWORA notice was provided (date and method documented)
- Identity documentation is collected for each person in eligibility unit
- Citizenship evidence OR immigration documentation is collected for each person
- SAVE verification is complete for all non-citizens (initial AND additional verification if prompted)
- PRWORA category is determined for each non-citizen (Qualified Alien or Nonqualified)

### Determination

<b>PASS</b>	All required documentation received and acceptable for each person in the eligibility unit. Proceed to Step 7.2 (Determine Eligibility).
<b>FAIL</b>	Documentation incomplete or unacceptable. Return to Procedure 4 (Documentation Pending) or issue request for additional documentation. Do not proceed to eligibility determination until all documentation is complete.

### Documentation Requirement

Record the pass/fail determination and date in the case file. This determination, along with the underlying verification records, constitutes the documentation required for audit purposes.

**CHECKLIST RETENTION:** The completed checklist (Appendix E) may be retained in program SOP files as a quality assurance reference. Inclusion of the completed checklist in individual case files is recommended for operational consistency but is not required for regulatory compliance. The pass/fail determination and supporting verification records are the compliance requirement.

### Step 7.2: Determine Eligibility

Based on verification results, determine PRWORA eligibility:

**ELIGIBLE if:**

- ALL persons in the eligibility unit are U.S. citizens/nationals, OR
- ALL persons in the eligibility unit are verified as Qualified Aliens under 8 U.S.C. § 1641, OR
- A combination of U.S. citizens/nationals and Qualified Aliens

**INELIGIBLE if:**

- ANY person in the eligibility unit is verified as a Nonqualified Alien (unless program provides for prorated benefits, which must be specifically authorized)

**Step 7.3: Supervisor Review (Required for Denials)**

All PRWORA eligibility denials must be reviewed by a Supervisor or Compliance Officer before issuance. The Supervisor shall:

- Review the case file for completeness
- Confirm that all verification steps were completed (including additional verification if prompted)
- Verify that the PRWORA category determination is correct
- Approve or reject the denial determination
- Sign and date the review

**Step 7.4: Issue Written Determination Notice**

Provide written notice to the applicant stating:

- The determination (approved or denied)
- PRWORA basis (citizen/national; qualified alien category; or ineligible)
- For denials: specific reason, documents considered, and appeal/reconsideration pathway
- Language access statement (interpretation and translation available upon request)

Retain a copy of the notice in the case file.

## 8. OPERATING MODELS FOR PRWORA VERIFICATION

### 8.1 Model A: Grantee-Centralized Verification

Under Model A, Grantee maintains exclusive control of SAVE verification. Subrecipients and contractors conduct intake and document collection, but all SAVE queries and PRWORA determinations are performed by Grantee staff.

#### 8.1.1 When to Use Model A

- Programs with multiple subrecipients or contractors
- Subrecipients with limited capacity or authority to establish SAVE access
- Programs with low verification volume where centralization is efficient
- Program risk warrants enhanced compliance controls

#### 8.1.2 Model A Workflow

##### **Subrecipient/Contractor Responsibilities:**

1. Provide uniform PRWORA notice to applicants using Grantee-approved scripts
2. Collect identity and citizenship/immigration documentation per approved checklists
3. Upload documentation to case management system or transmit via secure protocol
4. Flag cases requiring noncitizen verification
5. Continue processing other eligibility requirements while awaiting PRWORA determination
6. DO NOT make PRWORA eligibility determinations

##### **Grantee Responsibilities:**

1. Review submitted documentation for completeness
2. Conduct SAVE verification for all noncitizen cases
3. Complete additional verification when prompted by SAVE
4. Determine PRWORA eligibility category
5. Document determination in case file
6. Communicate eligibility determination to subrecipient/contractor
7. Provide supervisor review for denials
8. Monitor internal implementation of established policies and procedures

#### 8.1.3 Handoff Protocol

Grantee and subrecipients operating under the Centralized or Hybrid models must establish written handoff procedures addressing the following minimum requirements:

1. Document transmission: Secure method for transmitting applicant documentation (e.g., case management system upload, encrypted file transfer). Unencrypted email is prohibited for documents containing PII or immigration status information.

2. Notification protocol: Defined process for notifying the verifying entity when documents are submitted and ready for review.
3. Turnaround standard: Initial verification determination within 5 business days of complete documentation receipt; additional verification steps per SAVE response timelines.
4. Results communication: Method and responsible party for communicating determination results to case manager and applicant.
5. Escalation procedures: Process for handling incomplete documentation, complex cases, or SAVE responses requiring additional verification.

Subrecipients must document their specific handoff procedures in their PRWORA Implementation Plan (see Appendix K: Subrecipient Handoff Protocol Template) and submit to Grantee for approval prior to processing PRWORA-covered applications.

## **8.2 Model B: Subrecipient-Direct Verification**

Under Model B, authorized subrecipients conduct SAVE verification directly. This model requires robust training, oversight, and monitoring.

### **8.2.1 When to Use Model B**

- Large subrecipients with high verification volume
- Subrecipients with existing SAVE access and trained staff
- Subrecipients with demonstrated compliance capacity

### **8.2.2 Authorization Requirements**

Before a subrecipient may conduct direct verification, Grantee must:

1. Assess subrecipient capacity (staff qualifications, IT infrastructure, compliance history)
2. Confirm SAVE access (through subrecipient's own MOA or through Grantee's agreement)
3. Verify completion of required SAVE training for all verification staff
4. Execute written authorization designating the subrecipient for direct verification
5. Provide Grantee PRWORA procedures and checklists
6. Establish reporting and monitoring requirements

### **8.2.3 Reporting Requirements**

Subrecipients operating under Model B must submit regular reports to Grantee:

- Monthly verification activity report (number of verifications, outcomes, pending cases)
- Denial log with case details for QA review
- Additional verification tracking (cases requiring additional verification, resolution status)
- Discrepancy and appeal tracking

### 8.3 Model C: Hybrid Verification

Model C combines elements of centralized and distributed verification.

#### Configuration Options:

1. Split by Verification Stage: Subrecipient conducts initial SAVE verification; Grantee conducts all additional verification and makes final determination
2. Split by Outcome: Subrecipient makes determination for straightforward approvals; Grantee reviews all denials before issuance
3. Pre-Award QA Review: Subrecipient conducts all verification; Grantee conducts QA review of all determinations before award

### 8.4 Nonprofit Partner Considerations

**CRITICAL:** PRWORA contains a statutory exemption from verification requirements for nonprofit charitable organizations (8 U.S.C. § 1642(d)). However, this exemption applies to the verification obligation of the nonprofit, not to the underlying eligibility restrictions. The nonprofit verification exemption does not relieve states or local governments of the obligation to ensure eligibility for benefits they fund.

#### PRWORA Nonprofit Charitable Organization Exception (8 U.S.C. § 1642(d)):

PRWORA provides that a nonprofit charitable organization, in providing any Federal public benefit (or State or local public benefit), is not required under PRWORA to determine, verify, or otherwise require proof of eligibility of any applicant for such benefits.

For purposes of this exception, DOJ's interim guidance explains that an organization must be both "nonprofit" and "charitable." An organization is "nonprofit" if it is organized and operated for purposes other than making gains or profits for the organization, its members, or its shareholders, and is precluded from distributing any gains or profits to its members or shareholders. An organization is "charitable" if it is organized and operated for charitable purposes; the term "charitable" should be interpreted in its generally accepted legal sense and includes organizations dedicated to relief of the poor and distressed or the underprivileged, as well as religiously affiliated organizations and educational organizations.

#### Applicability and compliance allocation in CDBG, ESG, HOME and HOME-ARP delivery models:

This exception is limited to PRWORA Title IV verification requirements and does not eliminate PRWORA's underlying eligibility restrictions, nor does it relieve Grantee (and other governmental benefit-granting entities) of accountability to ensure PRWORA compliance for PRWORA-covered direct benefits. Accordingly, when nonprofit partners participate in applicable federal program delivery, Grantee will structure delivery so that PRWORA eligibility determinations occur at the governmental level prior to award/commitment, unless Grantee expressly designates a different verifying entity and documents the legal/operational basis.

#### Operational controls (required for any nonprofit-involved delivery model):

- Nonprofit partners may support outreach, intake assistance, and collection of applicant documentation.

- Unless expressly designated in writing as the verifying entity and authorized to use SAVE (or an approved equivalent verification system), nonprofit partners shall not make PRWORA verification determinations.
- Grantee shall document verification responsibility assignment in the subrecipient agreement/contract, monitoring plan, and file checklist, including: (i) which entity makes the PRWORA determination; (ii) when verification must be complete (pre-award); and (iii) how determinations and supporting documentation are transmitted and retained in the official case file.

**When nonprofit partners are involved in program delivery:**

- The nonprofit may collect documents and provide services without conducting verification
- Grantee (or another governmental entity) must still verify PRWORA eligibility before the benefit is awarded
- Grantee will structure program delivery under any established model, to ensure that PRWORA determination occurs at the governmental level.
- Grantee's subrecipient agreements will establish the verification responsibilities of the subrecipient.

## **9. CIVIL RIGHTS AND NON-DISCRIMINATION REQUIREMENTS**

### **9.1 Title VI Compliance**

Title VI of the Civil Rights Act (42 U.S.C. § 2000d) prohibits discrimination based on race, color, or national origin.

#### **9.1.1 Prohibited Practices**

Staff shall NOT:

- Make assumptions about citizenship or immigration status based on appearance, name, accent, or English proficiency
- Request documentation only from applicants who "look" or "sound" foreign
- Apply different documentation standards based on perceived national origin
- Treat applicants from certain countries or ethnic backgrounds with heightened scrutiny
- Make comments about immigration status, border policies, or related political matters
- Discourage applications based on perceived immigration status

#### **9.1.2 Required Practices**

Staff SHALL:

- Use identical intake scripts for all applicants
- Request the same documentation from all applicants in the same eligibility category
- Apply uniform timeframes and extensions to all applicants (see Section 7.4 Step 4.5 for uniform deadlines and extension policy)
- Document all verification activities consistently
- Treat all applicants with dignity and respect regardless of citizenship or immigration status

### **9.2 Uniform Documentation Requests (Document Abuse Prevention)**

To prevent discrimination and ensure equal access, Grantee and all subrecipients/contractors shall use standardized intake scripts and documentation checklists. Documentation requests must be consistent for all applicants in the same eligibility pathway.

Staff shall not:

- Request more documents than required
- Request a specific document when alternatives are acceptable
- Reject documents that appear reasonably genuine on their face absent a specific, articulable basis
- Apply different documentation standards based on perceived citizenship status, national origin, surname, accent, or English proficiency

When documentation is missing, unclear, or inconsistent, staff must issue a standardized deficiency notice, provide the standard cure opportunity available under program policy, and document all requests and applicant responses in the case file.

### **9.3 Training Requirements**

#### **Civil Rights Training:**

All staff involved in PRWORA verification should receive civil rights training covering:

- Title VI requirements and prohibited practices
- Document abuse prevention
- Language access protocols
- Disability accommodation procedures
- Implicit bias awareness
- Complaint procedures for civil rights violations

Training must be completed before staff conduct verification and refreshed annually.

#### **USCIS Mandatory Tutorial:**

USCIS requires all SAVE users to complete the official SAVE Tutorial and certify completion before creating any verification cases. This is a system-enforced requirement—users cannot access case creation functions until tutorial certification is complete.

#### **Tutorial Specifications:**

- Duration: Approximately 15-20 minutes
- Format: Online, self-paced
- Certification: Users must certify completion; recorded in SAVE user profile
- Recertification: USCIS may require periodic recertification via SAVE Message Center

**Timing:** New SAVE users must complete the tutorial immediately upon receiving credentials and before processing any verifications. Supervisors should verify tutorial completion as part of onboarding.

USCIS also offers free monthly webinars on SAVE operations. Webinar schedules are available at [uscis.gov/save](https://uscis.gov/save) under "Current Users."

## 10. RECORDS MANAGEMENT AND DATA SECURITY

### 10.1 Documentation Requirements

PRWORA verification documentation is maintained at two levels: program-level documentation that applies across all cases within an activity type, and case-level documentation that must be maintained for each individual verification.

#### 10.1.1 Program-Level Documentation

The following documentation is maintained at the program level and does not need to be duplicated in individual case files. These records establish the framework under which individual verifications are conducted.

Document/Artifact	Purpose
Activity Classification Memo	Documents A/B/C classification and rationale for each program activity type. Completed once per activity, not per case.
Privacy and Security Safeguards Documentation	Documents storage locations, access controls, encryption standards, and data handling procedures for PRWORA/SAVE information. Maintained as program-level policy documentation.
SAVE Memorandum of Agreement	Executed MOA with USCIS authorizing SAVE access. Maintained in program administration files.
Staff Training Records	Documentation of SAVE training completion and civil rights training for verification staff. Maintained in personnel/program files.

#### 10.1.2 Case File Documentation

Each PRWORA verification must be fully documented in the individual case file with the following minimum artifacts:

Document/Artifact	Purpose
Eligibility Unit Documentation	Identifies all persons requiring verification for this case
PRWORA Notice Acknowledgment	Confirms notice was provided (date, method, language)
Identity Documents (copies)	Establishes identity of each person in eligibility unit
Citizenship Evidence OR Immigration Documents	Establishes basis for PRWORA eligibility determination
SAVE Initial Verification Output	Documents verification query and system response (for noncitizens)

SAVE Additional Verification Output (if applicable)	Documents completion of second/third step verification
PRWORA Eligibility Determination	Signed pass/fail determination with eligibility basis and date
Supervisor Review (for denials)	Documents supervisory approval of denial determination
Determination Notice (copy)	Documents notification provided to applicant
Appeal/Reconsideration Materials (if applicable)	Documents any appeal process, review, and outcome

**CROSS-REFERENCE:** Case files should reference program-level documentation by citation (e.g., "Activity classified as Category A per Program Classification Memo dated [DATE]") rather than duplicating program-level records in each file.

## 10.2 Florida Public Records Confidentiality

F.S. § 119.071(5)(f) provides confidentiality protections for disaster recovery housing assistance information.

### Protected Information:

- Personal identifying information of applicants/participants in disaster recovery housing assistance programs
- Property photographs associated with disaster recovery assistance
- Immigration documentation and SAVE verification outputs
- Citizenship documentation

### Handling Public Records Requests:

1. Route request to Grantee public records/legal staff immediately
2. Do NOT release PRWORA documents directly from program staff
3. Legal staff will review for applicable exemptions
4. Redact protected information before any release
5. Document the exemption basis for any withheld records

## 10.3 Records Retention

- Florida Records Retention: Per F.A.C. 1B-24.003 and applicable General Records Schedules
- Federal Grant Retention: Per 2 CFR 200.334 (generally 3 years from closeout, with exceptions)
- Apply the LONGER of state or federal requirements, including any requirements established for federal program funds pursuant to the HUD requirements or other guidance related to records retention found in the Grantee's Policy Manual (esp. where PRWORA verification records may be needed for compliance monitoring)

- Florida Commerce will ensure that its policies and procedures governing the protection of personally identifiable information, records retention, data security and related matters align with any applicable federal requirements that apply to federal program funding.
- SAVE-specific retention: Per SAVE MOA terms

## **10.4 Data Security Requirements**

### **10.4.1 Minimum Security Controls**

- Role-based access control with least-privilege provisioning
- Multi-factor authentication for system access
- Encryption in transit (TLS 1.2 or higher)
- Encryption at rest for stored PRWORA data
- Audit logging of all access to PRWORA records
- Regular access reviews (recommend quarterly)
- Prompt deprovisioning of departed staff (within 24 hours of separation)
- Secure workstations (automatic screen lock, no shared accounts)

### **10.4.2 Transmission Security**

- Use encrypted file transfer protocols (SFTP, encrypted email, secure portal)
- Do NOT send unencrypted PRWORA documents via standard email
- Verify recipient authorization before transmitting
- Log all transmissions

## 11. SUBRECIPIENT REQUIREMENTS AND MONITORING

### 11.1 Flow-Down Requirements

Subrecipient agreements for PRWORA-covered activities must include:

- Requirement to comply with Grantee's PRWORA/SAVE procedures
- Use of Grantee-approved intake scripts and document checklists
- Prohibition on making PRWORA determinations (Model A) or authorization for direct verification (Model B)
- Secure document handling and transmission requirements
- Reporting requirements
- Training requirements for staff conducting PRWORA-related activities
- Cooperation with monitoring
- Corrective action provisions for noncompliance
- Agreement to provide access to its systems, records and other resources for purposes of monitoring compliance

### 11.2 Monitoring Requirements

This section establishes Grantee's monitoring of subrecipients for PRWORA compliance. Monitoring intensity varies by operating model:

- Centralized Model (A): Monitoring focuses on document collection completeness, handoff timeliness, and applicant notification procedures. Grantee retains verification responsibility.
- Hybrid Model (B): Monitoring covers handoff protocols, intake procedures, and coordination between subrecipient intake staff and Grantee verification staff.
- Delegated Model (C): Full monitoring scope applies, including procedural compliance, SAVE query accuracy, determination quality, and civil rights compliance.

Subrecipients must also maintain internal quality assurance processes per Section 12, with scope appropriate to their operating model. Section 12 QA protocols apply to the entity performing verification. For Centralized and Hybrid models, Grantee implements these protocols. For Delegated models, subrecipients must implement equivalent QA processes subject to Grantee's approval and monitoring.

#### 11.2.1 Monitoring Frequency

- Desk monitoring: Quarterly review of submitted case files and reports
- On-site monitoring: Annual for high-volume subrecipients; biennial for others
- Risk-based: Additional monitoring for subrecipients with identified issues

#### 11.2.2 Monitoring Scope

**Procedural Compliance:**

- Uniform notice provided to all applicants
- Standard intake scripts used consistently
- Documentation collected per approved checklists
- PRWORA verification completed before award
- Additional verification completed when prompted by SAVE
- Supervisor review completed for denials

**Documentation Compliance:**

- Required case file artifacts present
- Eligibility determination checklist complete and signed
- SAVE outputs properly documented and stored
- Privacy safeguards in place

**Civil Rights Compliance:**

- Verification applied uniformly without evidence of selective treatment
- Language access provided
- Staff trained on civil rights requirements

## **11.3 Corrective Action**

**Minor Findings:**

- Issue written finding to subrecipient
- Require corrective action plan within 30 days
- Provide technical assistance as needed
- Verify correction at next monitoring

**Major Findings:**

- Issue formal finding with required corrective action
- Consider suspension of new intake until correction verified
- Require retraining of affected staff
- Conduct follow-up monitoring within 60 days
- Consider termination for persistent noncompliance

## 12. QUALITY ASSURANCE

### 12.1 QA Sampling Protocols

Federal regulations require grantees to maintain oversight procedures sufficient to ensure PRWORA compliance across all program activities (24 CFR 570.501(b)). The specific sampling rates and review frequencies established in this section represent Grantee's implementation of this requirement and are adopted as program policy. Grantees and subrecipients operating under delegated authority may propose alternative sampling methodologies, subject to Grantee's approval, provided the alternative approach demonstrates equivalent quality assurance rigor.

**Exception:** Supervisory review of all PRWORA denials (100% review rate) is required to ensure due process protections and is not subject to alternative methodology.

#### 12.1.1 Pre-Award QA

Determination Type	Review Rate	Reviewer
Denials	100%	Supervisor/Compliance Officer
Approvals	10% random sample	Supervisor/Compliance Officer
Complex cases	100%	Supervisor/Compliance Officer

#### 12.1.2 Ongoing QA

- Monthly: Random sample of 5% of closed cases
- Quarterly: Targeted review of high-risk vendors or subrecipients
- Annually: Comprehensive file review as part of closeout preparation

## 12.2 Common Errors and Prevention

Common Error	Prevention Measure
Missing eligibility unit documentation	Require eligibility unit definition in all Category A case files
REAL ID accepted as PRWORA evidence	Train staff on distinction; include reminder in intake checklist
Missing SAVE outputs	Require PDF export immediately after each query
Denial on initial "Institute Additional Verification"	Training emphasis on mandatory additional verification; 100% supervisor review
Data entry errors causing "No Records Found"	Train on exact-match requirements; double-check identifiers
Selective documentation requests	Mandatory use of standard scripts; prohibit deviation

### **12.3 Corrective Action Framework**

The following framework establishes minimum corrective action standards. Subrecipients may adopt more stringent measures consistent with their personnel policies. Corrective action procedures must be documented in the subrecipient's PRWORA Implementation Plan and approved by Grantee.

#### **Staff-Level Issues:**

- First occurrence: Retraining with documentation
- Second occurrence: Written counseling and enhanced supervision
- Persistent issues: Performance action and removal from PRWORA duties

#### **Systemic Issues:**

- Identify root cause
- Develop corrective action plan
- Implement job aid revisions or procedure updates
- Conduct targeted retraining
- Monitor for recurrence

## 13. APPEAL AND GRIEVANCE PROCEDURES

### 13.1 Purpose and Scope

This section establishes the appeal and grievance procedures for applicants who receive an adverse PRWORA eligibility determination. These procedures ensure due process, provide an opportunity to correct errors, and create an auditable record of eligibility decisions.

**SCOPE:** These procedures apply specifically to PRWORA eligibility denials. Other program eligibility determinations (income, property ownership, duplication of benefits, etc.) are governed by separate program-specific grievance procedures. If an applicant is denied for both PRWORA and other eligibility reasons, each denial follows its applicable appeal process. This procedure is only to be used if program-specific appeals and grievance procedures are not already in place, as appeals and grievance procedures are required by PRWORA regulations.

### 13.2 Right to Appeal

#### 13.2.1 Who May Appeal

- The applicant named on the application
- An authorized representative with written authorization from the applicant
- A legal guardian or person with power of attorney for an incapacitated applicant

#### 13.2.2 Timeframe

Appeals must be filed within 30 calendar days of the date on the Notice of PRWORA Eligibility Denial (Appendix F.5). The filing date is:

- For mailed appeals: The postmark date
- For hand-delivered appeals: The date stamped by the receiving office
- For emailed/faxed appeals: The date received (timestamp)

#### 13.2.3 Good Cause Extensions

The 30-day deadline may be extended for good cause, including:

- Hospitalization or serious illness of the applicant
- Death in the immediate family
- Natural disaster affecting the applicant's ability to respond
- Failure to receive the denial notice due to address change or mail delivery issues
- Other circumstances beyond the applicant's control

Extension requests must be submitted before the original deadline expires, except where the circumstance prevented timely request (e.g., hospitalization). Extensions are limited to an additional 30 calendar days unless extraordinary circumstances warrant further extension.

### 13.3 Grounds for Appeal

An appeal may be filed on any of the following grounds:

Ground	Description
New Evidence	Documentation not previously available or submitted that establishes citizenship or qualified alien status
Procedural Error	Verification process was not conducted in accordance with policy (e.g., additional verification not completed, required steps skipped)
Misapplication of Criteria	PRWORA eligibility categories were incorrectly applied to the applicant's immigration status
SAVE System Error	SAVE returned incorrect information due to data entry error, stale records, or system malfunction
Staff Error	Data entry errors, document misinterpretation, or other staff mistakes affected the determination
Discrimination	Belief that denial was based on race, color, national origin, or other protected characteristic rather than PRWORA status

## 13.4 Filing an Appeal

### 13.4.1 Form and Content

Appeals must be in writing and include:

1. Applicant's full name and case number
2. Contact information (address, phone, email)
3. Date of the denial notice being appealed
4. Statement of grounds for appeal (see Section 13.3)
5. Explanation of why the applicant believes the determination was incorrect
6. Any supporting documentation
7. Signature of applicant or authorized representative

No specific form is required. Appeals may be submitted as a letter, on the optional Appeal Request Form (Appendix [X]), or in any written format containing the required information.

### 13.4.2 Where to Submit

Appeals may be submitted by:

- Mail: [Grantee PRWORA Appeals, Address]
- Email: [appeals email address]
- Fax: [fax number]
- In person: [office location and hours]

### 13.4.3 Acknowledgment

Within 5 business days of receiving an appeal, staff shall send the applicant a written acknowledgment confirming:

- Receipt of the appeal and date received
- Case number and appeal tracking number
- Name and contact information for the assigned reviewer
- Expected timeline for decision
- Any additional information needed (if appeal is incomplete)

## 13.5 Appeal Review Process

### 13.5.1 Independent Reviewer

Appeals shall be reviewed by a person who:

- Was not involved in the original eligibility determination
- Did not supervise the person who made the original determination
- Has been trained on PRWORA eligibility requirements and SAVE procedures
- Has authority to reverse, affirm, or remand the determination

**INDEPENDENCE REQUIREMENT:** The reviewer must be independent of the original determination. For subrecipients operating under Delegated models, appeals of subrecipient determinations shall be reviewed by Grantee's staff, not subrecipient staff.

### 13.5.2 Scope of Review

The reviewer shall:

1. Review the complete case file, including all documentation and SAVE outputs
2. Review the appeal submission and any new documentation
3. Verify that all required verification steps were completed
4. Confirm correct application of PRWORA eligibility categories
5. Re-query SAVE if there is reason to believe records may have been updated or the original query contained errors
6. Contact USCIS if necessary to resolve discrepancies
7. Interview the applicant if additional information is needed (optional)

### 13.5.3 Timeline

The reviewer shall issue a written decision within 15 business days of receiving a complete appeal. If additional information is requested from the applicant, the 15-day clock pauses until the information is received or the response deadline passes.

## 13.6 Appeal Decision

### 13.6.1 Decision Options

Decision	Effect
AFFIRMED	Original denial is upheld. Applicant receives written notice of final agency action with explanation.

REVERSED	Original denial is overturned. Applicant is determined PRWORA-eligible, and application proceeds to next eligibility step.
REMANDED	Case returned for additional verification or corrective action. Not a final decision; new determination issued after remand actions completed.

### 13.6.2 Written Decision

The written decision shall include:

- Decision (affirmed, reversed, or remanded)
- Summary of the grounds raised in the appeal
- Findings of fact for each ground
- Explanation of the rationale for the decision
- If affirmed: Notice that this is final agency action for PRWORA eligibility
- If reversed: Next steps for the application
- If remanded: Actions to be taken and timeline

### 13.7 Final Agency Action

A decision affirming the denial constitutes final agency action for PRWORA eligibility purposes. The written decision shall inform the applicant that:

- The PRWORA eligibility determination is final
- No further administrative appeal is available for this determination
- The applicant may have other legal remedies available (the notice does not provide legal advice on those remedies)
- If immigration status changes in the future, the applicant may reapply

### 13.8 Expedited Appeals

An expedited appeal may be requested when the applicant faces imminent harm, including:

- Imminent homelessness or displacement
- Imminent loss of property (e.g., foreclosure, condemnation)
- Medical emergency requiring housing modification
- Other circumstances creating urgent need for housing assistance

Expedited appeals shall be decided within 5 business days. The applicant must specifically request expedited review and explain the urgent circumstances. The reviewer determines whether expedited review is warranted.

### 13.9 Records and Reporting

#### 13.9.1 Appeal File

A complete appeal file shall be maintained including:

- Original denial notice
- Appeal submission and all attachments

- Acknowledgment letter
- Reviewer notes and work papers
- Any additional SAVE queries or correspondence
- Written decision
- Proof of delivery of decision to applicant

### **13.9.2 Tracking and Reporting**

Grantee shall maintain an appeal tracking log documenting:

- Total appeals received, by program and subrecipient
- Outcomes (affirmed, reversed, remanded)
- Average processing time
- Grounds cited in appeals
- Patterns or trends indicating systemic issues

Appeal data shall be reviewed quarterly as part of quality assurance (Section 12) to identify training needs, procedural improvements, or subrecipient performance issues.

### **13.9.3 Record Retention**

Appeal files shall be retained for the same period as other case file documentation per 24 CFR 570.506 and Section 10 of this policy.

## 14. SAVE RESOURCES

### USCIS SAVE Customer Support

For SAVE system issues, case status inquiries, or technical assistance:

Contact Method	Information
Phone	1-877-469-2563
International	1-571-293-7538
TTY	1-877-875-6028
Email	save.help@uscis.dhs.gov
Hours	Monday-Friday, 8:00 AM - 8:00 PM Eastern

*This contact information is for state agency staff only. Direct applicants to [uscis.gov/contactcenter](https://uscis.gov/contactcenter).*

### MOA Feature Configuration

The following features require MOA configuration with USCIS:

Feature	Purpose	Program Relevance
Photo Tool	Identity verification via photo comparison	Recommended - fraud prevention
Grant Date	Returns date status was granted	Recommended - 5-year bar calculations
Cuban-Haitian Entrant	Confirms Cuban-Haitian Entrant status	Relevant - qualified alien determination
VAWA	Confirms VAWA self-petition status	Relevant - qualified alien determination

## APPENDIX A: IMPLEMENTATION PATHWAYS BY PROGRAM STATUS

### A.1 Purpose and Applicability

This appendix provides implementation guidance for grantees and subrecipients whose programs are already operational at the time PRWORA verification requirements take effect. It establishes procedures for integrating PRWORA compliance into programs at various stages of the program lifecycle, from active intake through closeout.

This appendix distinguishes between:

- **Compliance Requirements:** Actions mandated by PRWORA, HUD guidance, or applicable law. These are non-negotiable.
- **Recommended Practices:** Advisory guidance reflecting best practices for implementation. Grantees and subrecipients may adopt, modify, or decline these recommendations based on program-specific circumstances and legal counsel.

**This appendix applies to:** Programs with any applications received, under review, approved, or disbursed prior to the implementation effective date.

**This appendix does not apply to:** Programs initiating intake after the implementation effective date. Those programs shall implement PRWORA procedures from the outset per Sections 5 through 12 of this policy.

### A.2 Implementation Effective Date

Field	Entry
Implementation Effective Date	[INSERT DATE]
Approved By	[INSERT NAME/TITLE]
Date Approved	[INSERT DATE]

#### **COMPLIANCE REQUIREMENT (Legally Mandated)**

The implementation effective date establishes the dividing line for PRWORA compliance requirements:

- **Benefits issued before the effective date:** No retroactive verification required.
- **Benefits issued on or after the effective date:** PRWORA verification required before issuance.

### A.3 Governing Principle

#### **COMPLIANCE REQUIREMENT (Legally Mandated)**

**PRWORA verification must be completed before any benefit issuance occurring on or after the implementation effective date.**

This single principle governs all transition scenarios. It derives directly from PRWORA's requirement that federal public benefits may only be provided to eligible individuals. Cases

where all benefits were fully disbursed prior to the implementation effective date require documentation only, not retroactive verification—PRWORA contains no retroactivity provision.

## A.4 Stage Identification

Use the following matrix to identify the current status of your program or individual cases. Each stage has corresponding guidance in Section A.5.

Stage	Program/Case Status	Key Identifier	See Section
1	Pre-Intake	Action Plan approved; intake not yet open	A.5.1
2	Active Intake, No Awards	Applications being received; no approvals issued	A.5.2
3	In Eligibility Review	Applications complete and under review; no award decision	A.5.3
4	Conditionally Approved	Eligibility approved; award letter not yet issued	A.5.4
5	Award Committed, Pre-Disbursement	Award letter issued, agreement executed; no funds released	A.5.5
6	Partial Disbursement (Construction)	Initial payment made; construction in progress; draws ongoing	A.5.6
7	Ongoing Direct Assistance	Recurring payments (e.g., rental assistance, THAB)	A.5.7
8	Substantial Completion	Project 90%+ complete; retainage or final draw pending	A.5.8
9	Fully Disbursed, Pre-Closeout	All payments made; case not formally closed	A.5.9
10	Closed Cases	Case formally closed in system	A.5.10
11	Program in Closeout	No new intake; clearing final cases; preparing grant closeout	A.5.11

## A.5 Stage-Specific Guidance

### A.5.1 Stage 1: Pre-Intake

**Status:** Action Plan approved; program designed; intake not yet open.

#### COMPLIANCE REQUIREMENT (Legally Mandated)

Programs that have not yet begun intake shall implement PRWORA verification procedures from the outset. Complete PRWORA verification for all applicants before issuing any award.

#### RECOMMENDED PRACTICE (Advisory)

1. Incorporate PRWORA verification into program policies and procedures before intake opens

2. Ensure SAVE access is established or verification pathway is defined per Section 6
3. Train intake staff on PRWORA procedures per Section 5
4. Include PRWORA notice in all applicant-facing materials

**NOTE:** This is the simplest scenario. The compliance requirement and recommended practices are aligned—full implementation from day one.

### A.5.2 Stage 2: Active Intake, No Awards

**Status:** Applications being received; eligibility review may be in progress; no awards issued.

#### **COMPLIANCE REQUIREMENT (Legally Mandated)**

Complete PRWORA verification before issuing any award. No award may be approved or committed until verification is complete for all members of the eligibility unit.

#### **RECOMMENDED PRACTICE (Advisory)**

1. Immediately begin providing PRWORA notice to all new applicants
2. For applications already submitted: Add PRWORA documentation request to eligibility review checklist
3. For applications in eligibility review: Contact applicant to request PRWORA documentation; pause award decision until verification is complete
4. Document the transition in the case file: "PRWORA verification added to case per policy implementation [DATE]"

### A.5.3 Stage 3: In Eligibility Review

**Status:** Application complete; under review for program eligibility; no award decision made.

#### **COMPLIANCE REQUIREMENT (Legally Mandated)**

Complete PRWORA verification before finalizing any eligibility determination that would result in benefit issuance.

#### **RECOMMENDED PRACTICE (Advisory)**

1. Contact applicant to provide PRWORA notice and request required documentation
2. Allow standard documentation pending period (60 days with extensions for good cause per Section 7.4)
3. If applicant fails to provide documentation or is determined ineligible under PRWORA, issue denial per Appendix F.5
4. Document transition in case file

### A.5.4 Stage 4: Conditionally Approved, Pre-Commitment

**Status:** Program eligibility approved; award amount determined; award letter/commitment not yet issued.

#### **COMPLIANCE REQUIREMENT (Legally Mandated)**

Complete PRWORA verification before issuing award commitment letter or executing grant agreement.

**☐ RECOMMENDED PRACTICE (Advisory)**

1. Place award commitment on hold pending PRWORA verification
2. Contact applicant to provide PRWORA notice and request documentation
3. If PRWORA-eligible: Proceed with award commitment
4. If not PRWORA-eligible: Issue denial for PRWORA eligibility; applicant retains program eligibility for future application if status changes
5. Document in case file: "Award commitment held pending PRWORA verification per policy implementation [DATE]. Verification completed [DATE]."

**A.5.5 Stage 5: Award Committed, Pre-Disbursement**

**Status:** Award letter issued; grant agreement executed; no funds released.

**■ COMPLIANCE REQUIREMENT (Legally Mandated)**

Complete PRWORA verification before releasing any funds. No disbursement may occur until verification is complete.

**☐ RECOMMENDED PRACTICE (Advisory)**

1. Notify applicant that PRWORA verification is required before funds can be released
2. Provide PRWORA notice and request documentation
3. If PRWORA-eligible: Proceed with disbursement
4. If not PRWORA-eligible: Consult program management and legal counsel on case disposition
5. Document in case file with verification completion date

**LEGAL CONSIDERATION:** Award commitments made prior to PRWORA policy implementation may create reliance interests. Programs may wish to consult legal counsel before terminating committed awards for PRWORA ineligibility and consider allowing reasonable time for applicants to resolve status issues with USCIS.

**A.5.6 Stage 6: Partial Disbursement (Construction Programs)**

**Status:** Initial payment made; rehabilitation/reconstruction in progress; additional draws pending.

**■ COMPLIANCE REQUIREMENT (Legally Mandated)**

- Complete PRWORA verification before processing any draw/disbursement occurring on or after the implementation effective date.
- Disbursements made prior to the implementation effective date do not require retroactive verification and are not subject to recovery solely due to subsequent PRWORA determination.

**☐ RECOMMENDED PRACTICE (Advisory)**

1. Immediately initiate PRWORA verification for all cases with pending draws
2. For prior disbursements: Document in case file as "pre-implementation disbursements"
3. If PRWORA-eligible: Proceed with remaining draws per normal process

4. If not PRWORA-eligible: Consult Grantee’s Program Counsel before making any determination on case disposition

CASES WITH PRWORA-INELIGIBLE DETERMINATION: Federal guidance does not provide a safe harbor for completing projects where the beneficiary is determined ineligible. Any decision regarding case disposition for partially complete projects must be made in consultation with legal counsel and documented thoroughly. The Grantee assumes no liability for grantee/subrecipient decisions to continue or discontinue disbursements in such cases.

### A.5.7 Stage 7: Ongoing Direct Assistance (Recurring Payments)

**Status:** Recurring monthly or periodic payments in progress (e.g., rental assistance, THAB).

#### ■ COMPLIANCE REQUIREMENT (Legally Mandated)

- Complete PRWORA verification before issuing any payment for a pay period beginning on or after the implementation effective date.
- Payments issued for pay periods prior to implementation do not require retroactive verification.

#### □ RECOMMENDED PRACTICE (Advisory)

1. Immediately initiate PRWORA verification for all active recipients
2. Provide written notice to recipients that verification is required to continue assistance
3. Allow reasonable time to provide documentation before suspending payments
4. Coordinate verification timing with payment cycles to minimize disruption
5. If PRWORA-eligible: Continue assistance per program terms
6. If not PRWORA-eligible: Terminate ongoing assistance with appropriate notice; provide appeal rights per Section 13

### A.5.8 Stage 8: Substantial Completion (Final Payment Pending)

**Status:** Project 90%+ complete; retainage or final draw held.

#### COMPLIANCE REQUIREMENT (Legally Mandated)

Complete PRWORA verification before releasing final payment or retainage if such payment occurs on or after the implementation effective date.

#### RECOMMENDED PRACTICE (Advisory)

1. Initiate PRWORA verification before releasing final payment/retainage
2. If PRWORA-eligible: Release final payment per normal process
3. If not PRWORA-eligible: Consult Grantee's Program Counsel before releasing or withholding final payment

**LEGAL CONSULTATION REQUIRED:** Determination of whether to release or withhold final payment for a PRWORA-ineligible beneficiary on a substantially complete project involves legal and policy considerations beyond this guidance. Such decisions must be made in consultation with legal counsel and documented in the case file.

### A.5.9 Stage 9: Fully Disbursed, Pre-Closeout

**Status:** All payments made; case administratively complete; not yet formally closed.

#### COMPLIANCE REQUIREMENT (Legally Mandated)

No PRWORA verification is required for cases where all benefits were disbursed prior to the implementation effective date. PRWORA contains no retroactivity provision requiring verification of completed disbursements.

#### RECOMMENDED PRACTICE (Advisory)

Add documentation to case file:

*"PRWORA Documentation: All benefits for this case were disbursed prior to PRWORA policy implementation effective [DATE]. No retroactive verification required per Appendix A.5.9 of PRWORA Policy. Case file documented [DATE] by [STAFF NAME]."*

Proceed with normal case closeout procedures.

### A.5.10 Stage 10: Closed Cases

**Status:** Case formally closed in system of record.

#### COMPLIANCE REQUIREMENT (Legally Mandated)

No action required. Cases formally closed prior to the implementation effective date are outside the scope of PRWORA implementation. PRWORA contains no retroactivity provision.

#### RECOMMENDED PRACTICE (Advisory)

If reporting or audit requires identification of pre-implementation cases, the system close date serves as sufficient documentation. No additional case file documentation is necessary.

### A.5.11 Stage 11: Program in Closeout Phase

**Status:** Program no longer accepting new applications; clearing final cases; preparing for grant closeout.

#### **■ COMPLIANCE REQUIREMENT (Legally Mandated)**

Apply the governing principle: PRWORA verification must be completed before any benefit issuance occurring on or after the implementation effective date. Each remaining open case must be evaluated individually.

#### **□ RECOMMENDED PRACTICE (Advisory)**

1. Inventory all remaining open cases
2. Categorize each case by stage using the matrix in Section A.4
3. Apply the appropriate stage-specific guidance (A.5.1–A.5.10) to each case
4. Prioritize verification for cases with pending disbursements
5. Document closeout-phase implementation approach in program files

## **A.6 Exceptions and Special Circumstances**

The following scenarios require specific guidance beyond the standard stage-based procedures. Unless otherwise noted, guidance in this section is advisory; the compliance requirement in all cases remains: verify before any benefit issuance occurring on or after the implementation effective date.

### **A.6.1 Reopened Cases**

#### **■ COMPLIANCE REQUIREMENT (Legally Mandated)**

If a closed case is reopened and the reopening will result in additional benefit issuance on or after the implementation effective date, PRWORA verification must be completed before such issuance.

#### **□ RECOMMENDED PRACTICE (Advisory)**

1. Determine whether reopening involves additional benefit issuance
2. If no additional benefits: No verification required; document reason for reopening
3. If additional benefits: Complete PRWORA verification before issuing any additional benefits
4. Document verification status and date in reopened case file

### **A.6.2 Award Amendments (Additional Funds)**

#### **■ COMPLIANCE REQUIREMENT (Legally Mandated)**

If an award amendment will result in additional disbursement on or after the implementation effective date, PRWORA verification must be completed before such disbursement if no prior verification exists.

#### **□ RECOMMENDED PRACTICE (Advisory)**

For awards where PRWORA verification was previously completed:

- Confirm no known change in beneficiary status since original verification
- Programs may consider re-verification for amendments where significant time has elapsed since original verification or where the amendment substantially increases the award value
- Document verification status in amendment file

**POLICY DECISION:** Federal guidance does not specify whether award amendments constitute new benefit determinations requiring independent verification or modifications of existing determinations. Programs should establish consistent policy on amendment verification in consultation with legal counsel.

### A.6.3 Eligibility Unit Changes

#### COMPLIANCE REQUIREMENT (Legally Mandated)

If new members are added to an eligibility unit and any benefit attributable to the expanded household will be issued on or after the implementation effective date, the new members must be verified before such issuance.

#### RECOMMENDED PRACTICE (Advisory)

**Members Added:** Verify new members before any additional benefits are issued that are attributable to the expanded household size.

**Members Removed:** No additional verification required for remaining members unless their status has changed.

**Status Changes:** If a verified member reports a change in citizenship or immigration status, programs should consider re-verification before the next benefit issuance.

### A.6.4 Subrecipient Transitions

#### RECOMMENDED PRACTICE (Advisory)

When a subrecipient transitions mid-program (e.g., contract termination, new subrecipient assumes cases), verification records should transfer with the case files:

1. Outgoing subrecipient: Compile verification documentation for all cases being transferred
2. Grantee: Verify completeness of verification records during transition
3. Incoming subrecipient: Review transferred verification records; do not re-verify unless records are incomplete
4. Document chain of custody for verification records in each transferred case file

### A.6.5 System Outages and Delays

#### COMPLIANCE REQUIREMENT (Legally Mandated)

SAVE system outages do not waive the PRWORA verification requirement. Benefits may not be issued to unverified applicants.

#### RECOMMENDED PRACTICE (Advisory)

- Document the outage (dates, duration, USCIS communications if available)
- Extend documentation pending periods as needed for good cause

- Process verifications promptly when system access is restored
- For urgent cases (imminent displacement, safety issues), consult Grantee’s program management for guidance

## A.7 Documentation Requirements for Transition Cases

### **■ COMPLIANCE REQUIREMENT (Legally Mandated)**

Grantees and subrecipients must maintain records sufficient to demonstrate PRWORA compliance for all cases where benefits are issued on or after the implementation effective date, consistent with record retention requirements at 24 CFR 570.506 and Section 10 of this policy.

### **□ RECOMMENDED PRACTICE (Advisory)**

Use the following documentation standards for transition cases:

Case Type	Recommended Documentation
Verified and Eligible	Standard PRWORA verification file per Section 10; note transition date if applicable
Verified and Ineligible	Verification records; denial notice; appeal records if applicable; case disposition documentation
Pre-Implementation Disbursement	Statement that benefits were disbursed prior to [DATE]; no retroactive verification required; staff signature and date
Partial Pre-Implementation	Statement documenting pre-implementation disbursements; verification records for post-implementation disbursements
Closed Pre-Implementation	System close date serves as documentation; no additional documentation required

## A.8 Transition Implementation Reporting

### **□ RECOMMENDED PRACTICE (Advisory)**

Subrecipients should report transition implementation status to the Grantee within 90 days of the implementation effective date. The report should include:

1. Total number of active cases at implementation date, by stage
2. Number of cases verified and determined eligible
3. Number of cases verified and determined ineligible (and disposition)
4. Number of cases documented as pre-implementation (no verification required)
5. Number of cases pending verification
6. Any implementation challenges or issues requiring guidance

The Grantee will use this data to monitor implementation progress, identify technical assistance needs, and report to HUD as required.

**NOTE:** Reporting requirements may be formalized by Grantee’s program notice. This section provides recommended reporting elements pending such notice.

**Document Control:** This appendix is part of the PRWORA Eligibility Verification Policy and Procedures. Questions regarding transition implementation should be directed to Grantee's PRWORA Compliance Unit.

## APPENDIX B: VERIFICATION WORKFLOWS AND DECISION TREES

### Source Documentation Note

These workflows illustrate procedural logic required by PRWORA, HUD guidance, and USCIS SAVE documentation (July 2025). Key limitations:

- SSN-only cases cannot be escalated to additional verification; must close and resubmit with immigration enumerator
- Photo Tool "No Match" responses require mandatory escalation
- SAVE may automatically close stale cases after 240 days if not manually closed

The following workflow diagrams illustrate the PRWORA verification processes. Each diagram uses color coding to indicate different roles and decision points:

- Navy Blue: Process steps and general activities
- Gold/Orange: Decision points requiring evaluation
- Red: Critical actions – mandatory steps that cannot be skipped
- Green: Eligible outcomes / Approved paths
- Dark Green (Terminal): Start/End points

**NOTE:** Editable versions of these diagrams are available in SVG format for import into Microsoft Visio or other diagramming tools.

### B.1 Activity-Level PRWORA Applicability Triage

This workflow guides the classification of CDBG-DR, CDBG, HOME, HOME-ARP, ESG, and ESG-RUSH activities into Category A (PRWORA-covered), Category B (exempt), or Category C (not a direct benefit). Activity classification must be completed before opening intake for any program.

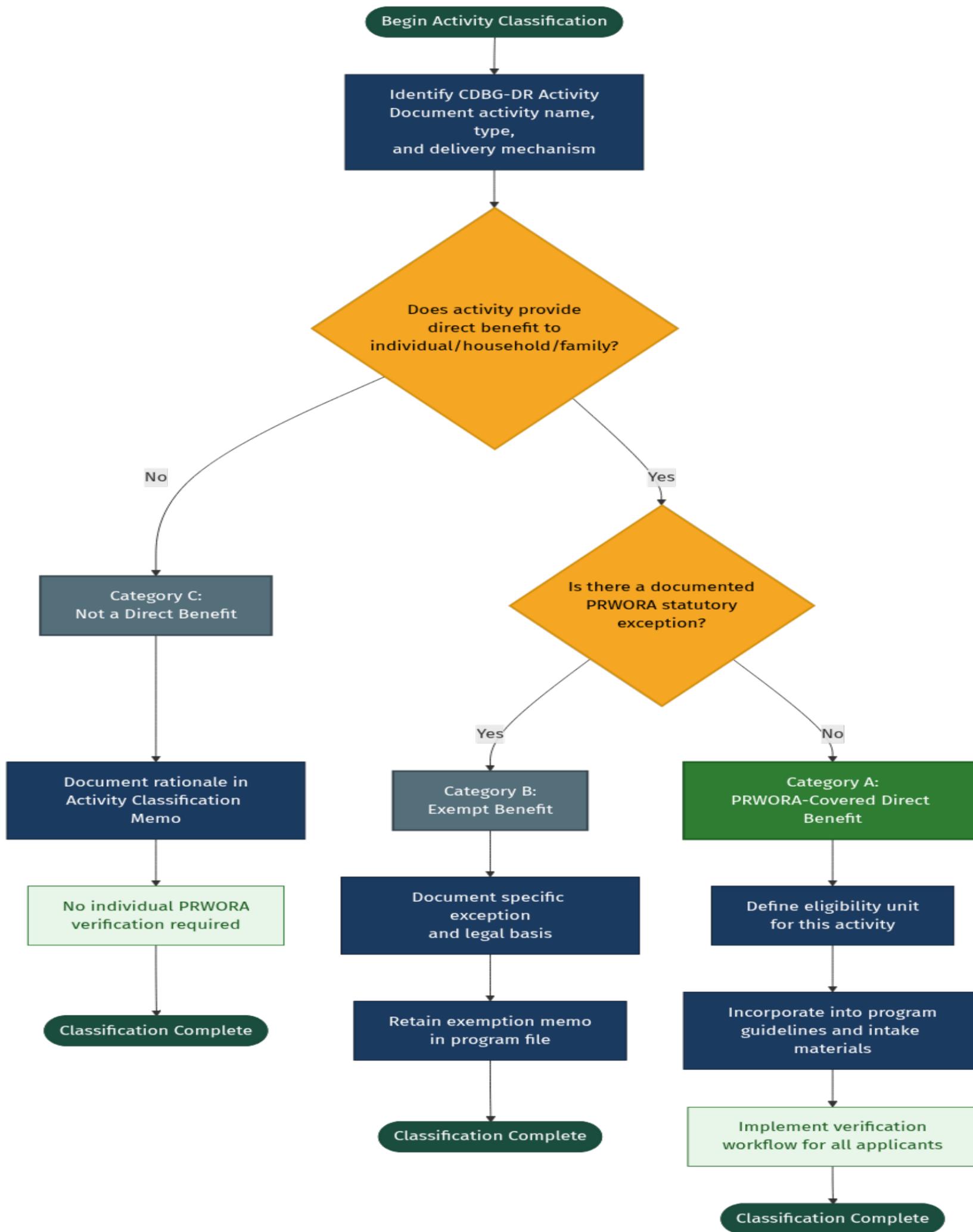


Figure B.1: Activity-Level PRWORA Applicability Triage

### B.2 Case-Level PRWORA/SAVE Verification Workflow

This comprehensive workflow shows the complete PRWORA verification process from application receipt through final determination. Note the role color coding for Intake Specialist, Eligibility Specialist, and Supervisor responsibilities.

**NOTE:** Cases flagged for SAVE verification must be transmitted to the Eligibility Specialist within 1 business day of intake completion.

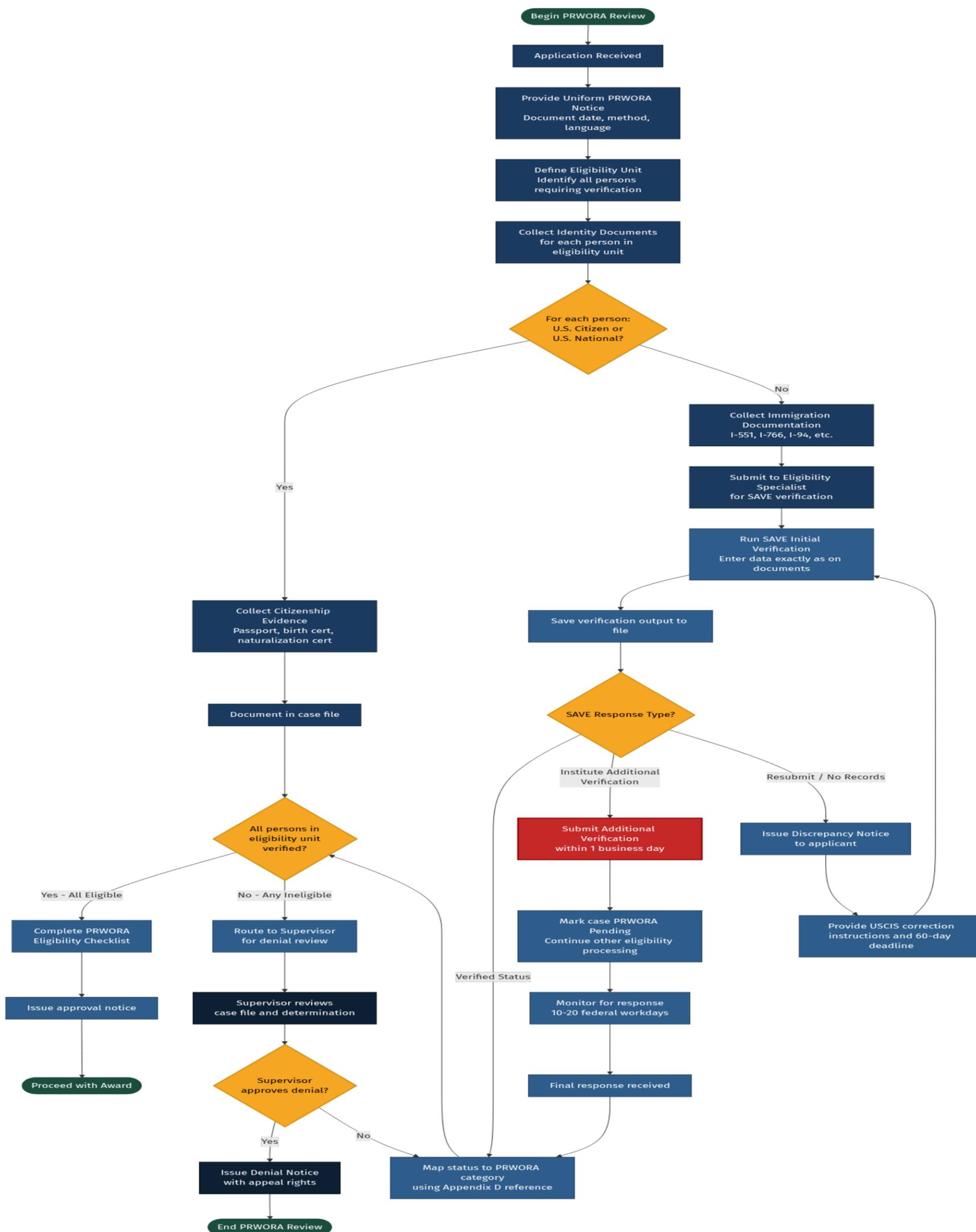


Figure B.2: Case-Level PRWORA/SAVE Verification Workflow

### B.3 SAVE Response Handling Decision Tree

This decision tree guides Eligibility Specialists through the interpretation of SAVE system responses and required follow-up actions for each response type.

**CRITICAL:** When SAVE returns "Institute Additional Verification," you MUST submit the additional verification request within 1 business day, per Grantee's internal processing standards. DO NOT deny any application while verification is pending.

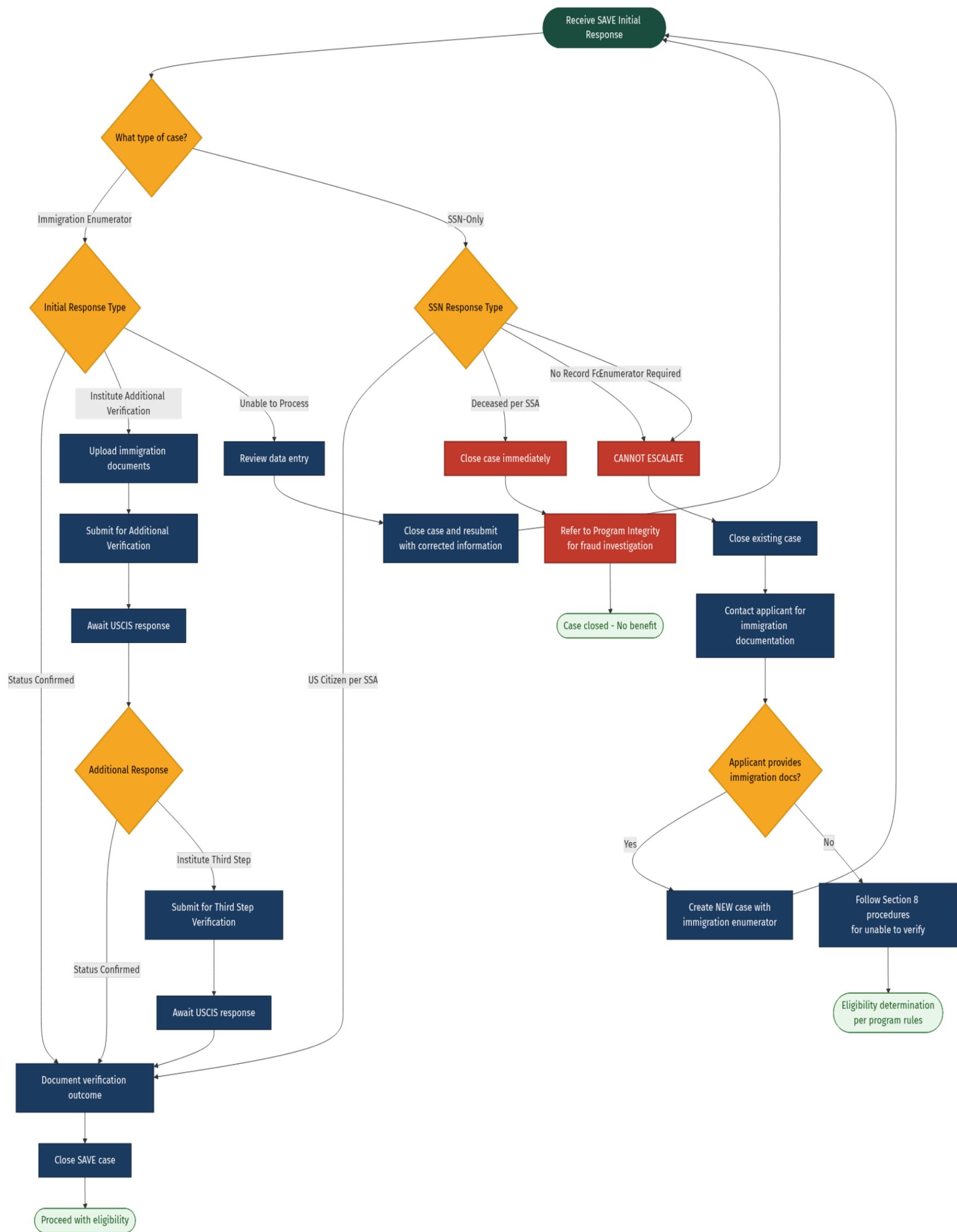


Figure B.3: SAVE Response Handling Decision Tree

### B.4 Photo Tool Verification

This workflow guides Eligibility Specialists through the process of comparing photos displayed in SAVE to provided documentation and how to handle cases of photo mismatch.

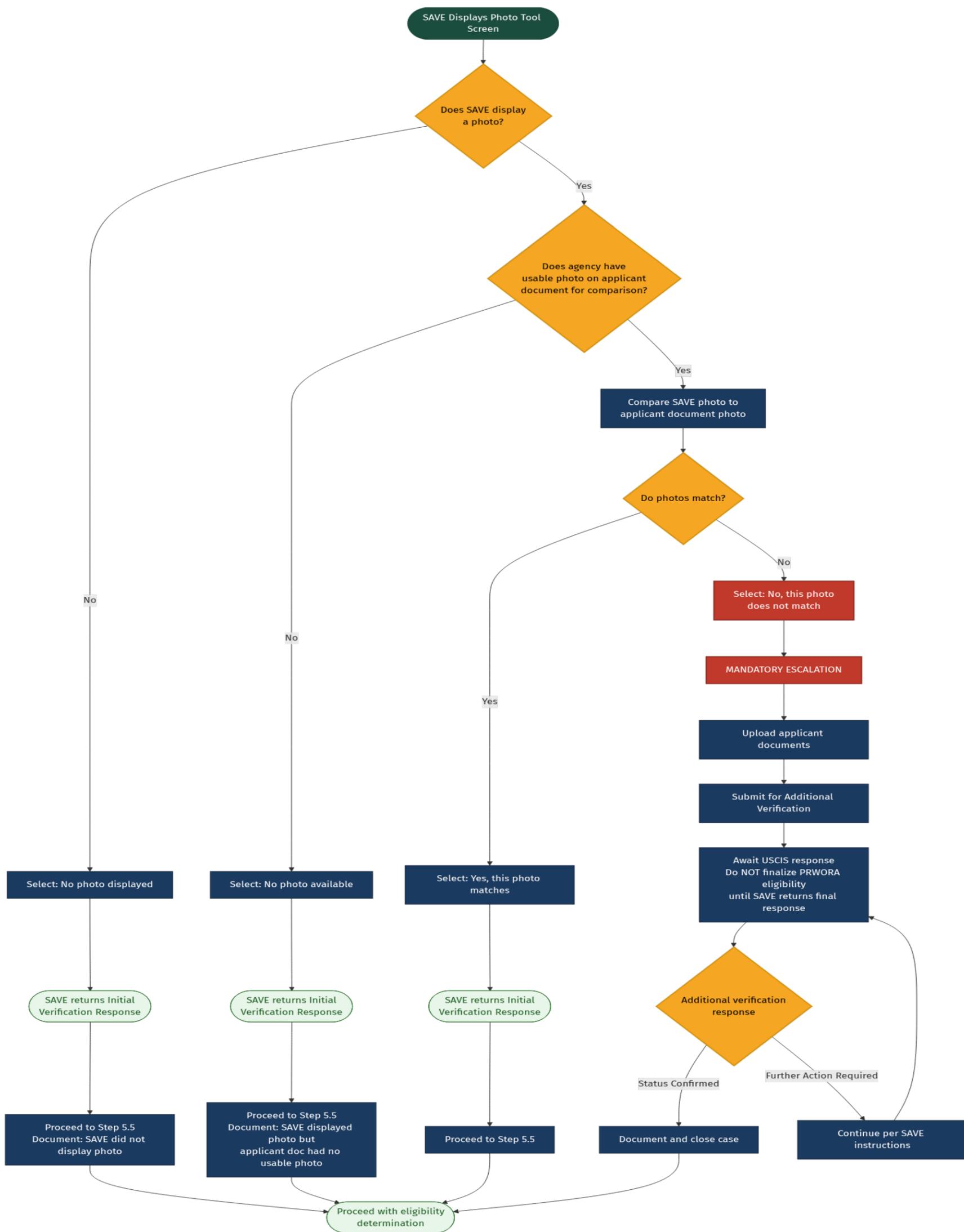


Figure B.4: Photo Tool Verification

### B.5 Operating Model Selection Workflow

This workflow guides program managers through selecting the appropriate verification operating model based on subrecipient capacity and program requirements.

Model A (Grantee-Centralized) is recommended for programs with multiple subrecipients or contractors to ensure consistency. Model B (Subrecipient-Direct) requires demonstrated SAVE access and trained staff. Model C (Hybrid) offers flexible configurations for complex program structures.

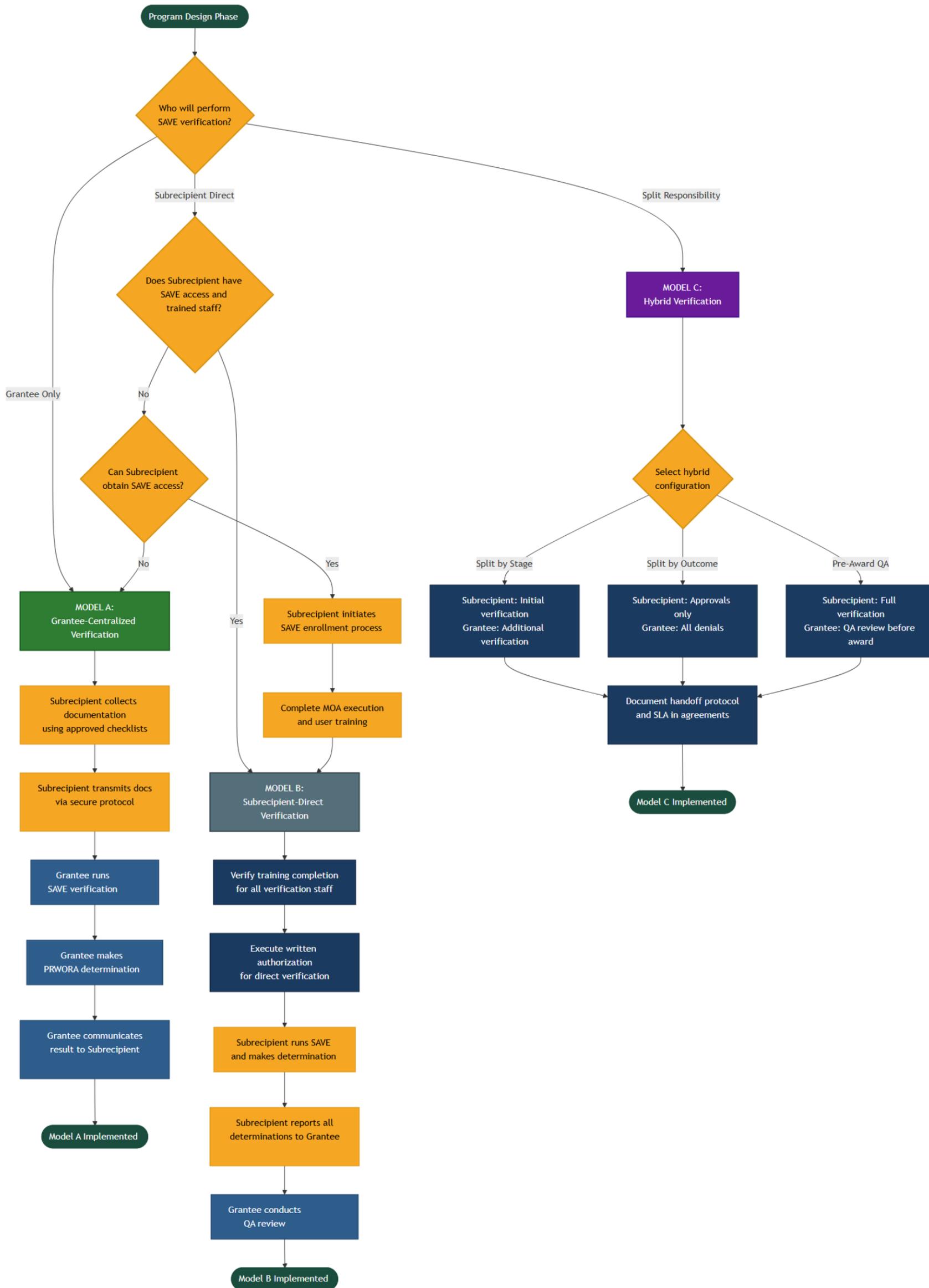


Figure B.5: Operating Model Selection Workflow

### B.6 Intake Documentation Collection Workflow

This workflow provides Intake Specialists with step-by-step guidance for collecting PRWORA-required documentation during the application intake process. The workflow ensures uniform treatment of all applicants regardless of perceived citizenship status.

**NOTE:** Use the standardized intake script (Appendix F) for ALL applicants. Ask the same questions in the same order to ensure nondiscriminatory administration.

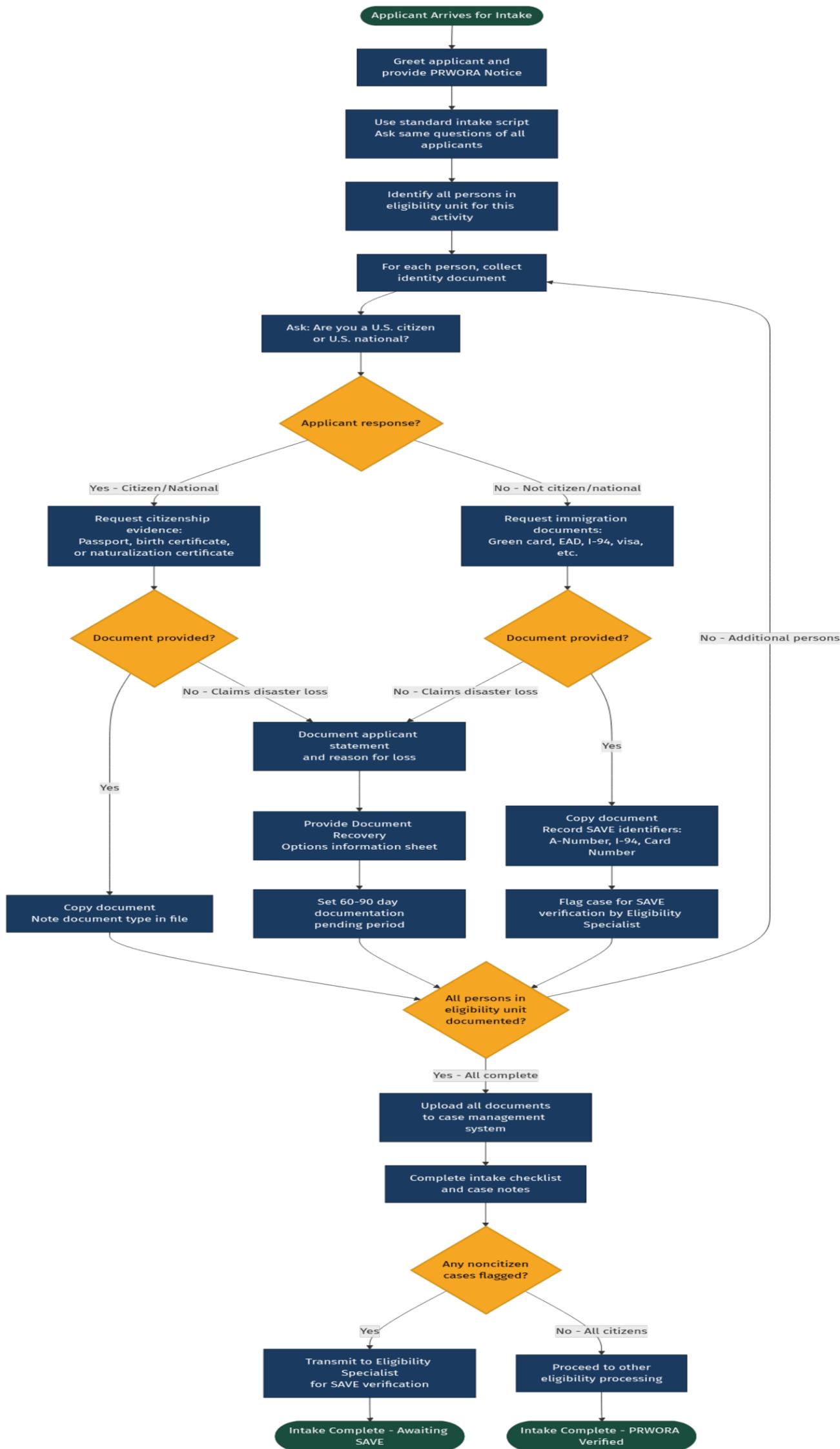


Figure B.6: Intake Documentation Collection Workflow

## APPENDIX C: ACCEPTABLE DOCUMENTS REFERENCE

### C.1 U.S. Citizenship Documentation Hierarchy

#### Tier 1: Primary Stand-Alone Evidence

Document	Notes
U.S. Passport (valid or expired)	Expired passports acceptable if issued without limitation
U.S. Passport Card (valid or expired)	Same as passport
Certificate of Naturalization (N-550, N-570)	Issued by USCIS upon naturalization
Certificate of U.S. Citizenship (N-560, N-561)	Issued to derivative citizens

#### Tier 2: Secondary Evidence (Requires Separate Identity Document from Section 4.1)

Document	Notes
U.S. Birth Certificate (certified copy)	Must be issued by state/county/municipal vital records office
Consular Report of Birth Abroad (FS-240, DS-1350, FS-545)	For citizens born abroad to U.S. citizen parents
U.S. Military Record showing U.S. birthplace	DD-214 or other official military documentation
Hospital record of birth	Only if birth certificate unavailable

#### Tier 3: Tertiary Evidence (Last Resort – Requires Supervisor Approval)

- Affidavit of citizenship signed under penalty of perjury
- Early school records showing U.S. birthplace
- Census records showing U.S. birth

### C.2 Immigration Documents for SAVE Verification

Document	SAVE Identifier	Likely PRWORA Status
Permanent Resident Card (I-551)	A-Number	Qualified Alien (LPR)
Refugee Travel Document	A-Number	Qualified Alien (Refugee)
Asylum Approval Letter	A-Number, I-94	Qualified Alien (Asylee)
Employment Authorization Document (I-766)	A-Number, Card Number	VERIFY – varies by status
I-94 Arrival/Departure Record	I-94 Number	VERIFY – depends on code
Foreign Passport with Visa	I-94, Visa Number	VERIFY – most nonimmigrants NOT qualified

I-797 Notice of Action	Receipt Number	VERIFY – may indicate pending status
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### C.3 Identity Documents (All Applicants)

- Florida driver license or state ID (including REAL ID)
- U.S. passport or passport card
- U.S. military identification
- Foreign passport with photo
- Other government-issued photo ID

**CRITICAL:** REAL ID is an identity document only. It does not prove citizenship or qualified alien status.

### C.4 Document Upload Requirements for SAVE

When uploading documents to SAVE for additional verification:

#### Technical Requirements:

- Accepted formats: .JPG, .JPEG, .PNG, or .PDF only
- Maximum file size: 5 MB
- **Single file upload only — combine multiple documents into one file before uploading**

**Combining Multiple Documents:** Staff must combine all documents into a single file:

- Scan all documents (front and back) into a single multi-page PDF
- Use PDF merge software to combine separate scans
- If using images, convert to a single PDF

**Quality Standards:** All text legible, photos visible, edges captured, no shadows/glare. 300 DPI minimum resolution.

## APPENDIX D: SAVE RESPONSE CODE HANDLING GUIDE

### Source Documentation Note

Response handling reflects PRWORA requirements and USCIS documentation (July 2025). Verify specific codes against USCIS materials. Monitor SAVE Message Center for updates.

### D.1 PRWORA Category Mapping

SAVE Status Classification	PRWORA Category
Lawful Permanent Resident (LPR)	QUALIFIED ALIEN
Refugee	QUALIFIED ALIEN
Asylee	QUALIFIED ALIEN
Parolee (admitted for 1+ year)	QUALIFIED ALIEN
Cuban/Haitian Entrant	QUALIFIED ALIEN
Withholding of Deportation/Removal	QUALIFIED ALIEN
Conditional Entrant (pre-April 1980)	QUALIFIED ALIEN
Temporary Protected Status (TPS)	NONQUALIFIED ALIEN
Deferred Action (including DACA)	NONQUALIFIED ALIEN
Nonimmigrant Visa (H-1B, F-1, B-2, etc.)	NONQUALIFIED ALIEN
Parolee (less than 1 year)	NONQUALIFIED ALIEN

### D.2 Response Type Actions

#### Verified Status Returned

1. Save response to file
2. Map status to PRWORA category
3. Document determination

#### Institute Additional Verification

1. Submit the additional verification request within 1 business day of receiving the SAVE prompt, per Grantee's internal processing standards
2. Mark case pending
3. Continue other processing
4. DO NOT DENY
5. Monitor for response. USCIS response times vary; consult the USCIS SAVE "Verification Response Times" resource for current estimates and follow internal case-aging controls until a final SAVE response is received

### Resubmit with More Information

1. Review error message
2. Contact applicant for additional identifiers if needed
3. Correct data entry
4. Resubmit verification

### No Records Found

1. Issue Verification Discrepancy Notice
2. Provide USCIS record correction instructions
3. Set 60-day response deadline (extensions for good cause)
4. Re-verify after correction

### SSN-Only Response Codes

These codes apply only to cases created with SSN and no immigration enumerator:

Response	Meaning	Action
United States Citizen (Per SSA Record)	Citizenship confirmed	Complete. Document and close.
Deceased (Per SSA Record)	Individual deceased per SSA	Close. Refer to Program Integrity.
No Record Found with SSA	No SSA match	Close. Get immigration docs. New case.
Immigration Enumerator Required	Needs enumerator	Close. Get immigration docs. New case.

**SSN-only cases cannot be escalated. Must close and create new case with immigration enumerator.**

## APPENDIX E: SAMPLE CASE FILE CHECKLIST AND DETERMINATION FORM

This sample checklist is provided as a resource for subrecipients and program staff to support consistent case file documentation. Use of this specific form is not required. Programs may adapt this template to their operational workflows or develop equivalent documentation procedures, provided the case file contains sufficient documentation to support the PRWORA eligibility determination and withstand audit review. At minimum, case files must document: (1) eligibility unit identification, (2) verification method and outcome for each person, and (3) signed/dated eligibility determination.

### PRWORA Eligibility Determination Checklist

#### Case Information:

Applicant Name: \_\_\_\_\_

Case Number: \_\_\_\_\_

Activity/Program: \_\_\_\_\_

Intake Date: \_\_\_\_\_

#### Section 1: Activity Classification

- Activity classified as Category A (PRWORA-covered direct benefit)
- Activity classification memo on file with rationale

#### Section 2: Eligibility Unit Definition

- Eligibility unit defined for this activity
- All persons in eligibility unit identified

#### Section 3: Applicant Notice

- Uniform PRWORA notice provided

Date: \_\_\_\_\_ Method:  Written  Oral  Both

Language:  English  Spanish  Other: \_\_\_\_\_

- Notice acknowledgment documented

#### Section 4: Documentation Collected

For each person in the eligibility unit:

- Identity document collected
- U.S. citizen/national?  Yes  No

If Yes:  Citizenship evidence collected

If No:  Immigration documentation collected

**Section 5: SAVE Verification (Non-Citizens Only)**

Not applicable (all persons are U.S. citizens/nationals)

Initial SAVE verification completed

Date: \_\_\_\_\_ SAVE Case #: \_\_\_\_\_

SAVE output saved to file

Provided applicant with SAVE CaseCheck information (uscis.gov/save) and case verification number

Response:  Verified  Additional Verification  Other

If Additional Verification:

Additional verification submitted (Date: \_\_\_\_\_)

Final response received (Date: \_\_\_\_\_)

Final SAVE output saved to file

**Section 6: PRWORA Category Determination**

For each person:  U.S. Citizen  U.S. National  Qualified Alien  Nonqualified Alien

**Section 7: Eligibility Determination**

ELIGIBLE – All persons in eligibility unit are U.S. citizens/nationals or Qualified Aliens

INELIGIBLE – One or more persons is a Nonqualified Alien

**Section 8: Supervisor Review (Required for Denials)**

Not applicable (approved)

Supervisor review completed

Supervisor Name: \_\_\_\_\_

Date: \_\_\_\_\_ Decision:  Approved  Rejected

**Section 9: Notice Issued**

Written determination notice issued

Date: \_\_\_\_\_ Method:  Mail  Email  In-person

Eligibility Specialist Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Supervisor Signature (denials): \_\_\_\_\_ Date: \_\_\_\_\_

## **APPENDIX F: APPLICANT NOTICES AND SCRIPTS**

### **F.1 PRWORA Applicant Notice (English)**

#### **NOTICE OF FEDERAL ELIGIBILITY REQUIREMENTS**

Because this assistance is funded with federal funds, federal law requires us to verify that each benefit recipient is a U.S. citizen, U.S. national, or a qualified non-citizen.

We ask the same eligibility questions of all applicants. A driver license or state ID helps us confirm your identity, but it does not by itself establish federal benefit eligibility.

#### **What you need to provide:**

- If you are a U.S. citizen or U.S. national: A U.S. passport, birth certificate, naturalization certificate, or other acceptable citizenship evidence.
- If you are not a U.S. citizen or national: Immigration documentation so we can verify your eligibility using an approved federal verification process.

#### **Important information:**

- If verification requires additional review, your application will remain pending while that review is completed. We will not deny your application solely because initial verification is incomplete.
- Providing false information about citizenship or immigration status is a federal crime punishable by fines and/or imprisonment up to 5 years (18 U.S.C. § 1015).
- If you need language assistance or accommodations, please let us know.

Questions? Contact [INSERT CONTACT INFORMATION]

### **F.2 PRWORA Applicant Notice (Spanish)**

#### **AVISO DE REQUISITOS FEDERALES DE ELEGIBILIDAD**

Debido a que esta asistencia está financiada con fondos federales de recuperación ante desastres, la ley federal requiere que verifiquemos que cada beneficiario sea ciudadano estadounidense, nacional de EE.UU., o un no ciudadano calificado.

Hacemos las mismas preguntas de elegibilidad a todos los solicitantes. Una licencia de conducir o identificación estatal ayuda a confirmar su identidad, pero por sí sola no establece la elegibilidad para beneficios federales.

#### **Lo que necesita proporcionar:**

- Si es ciudadano o nacional de EE.UU.: Un pasaporte de EE.UU., certificado de nacimiento, certificado de naturalización, u otra evidencia aceptable de ciudadanía.
- Si no es ciudadano o nacional de EE.UU.: Documentación de inmigración para que podamos verificar su elegibilidad utilizando un proceso federal de verificación aprobado.

#### **Información importante:**

- Si la verificación requiere revisión adicional, su solicitud permanecerá pendiente mientras se completa esa revisión. No negaremos su solicitud únicamente porque la verificación inicial esté incompleta.
- Proporcionar información falsa sobre ciudadanía o estado migratorio es un delito federal punible con multas y/o prisión de hasta 5 años (18 U.S.C. § 1015).
- Si necesita asistencia de idioma o adaptaciones, por favor háganoslo saber.

¿Preguntas? Contacte a [INSERT CONTACT INFORMATION]

### F.3 Sample Intake Script

[Use this script with all applicants at intake]

"Thank you for applying for \_\_\_\_\_ assistance. Because this program is funded with federal funds, federal law requires us to verify the citizenship or immigration status of everyone who will receive benefits from this program.

I'm going to ask you a few questions. We ask these same questions of everyone who applies. This is a standard part of our process.

First, I need to confirm who will be receiving benefits under this application.

[Define eligibility unit based on program requirements]

For each person who will receive benefits:

1. Are you a U.S. citizen or U.S. national? If YES: I'll need to see documentation such as a U.S. passport, birth certificate, or naturalization certificate. If NO: I'll need to see your immigration documents so we can verify your eligibility through the federal verification system.
2. [Collect identity document] I'll also need a photo ID to confirm your identity. A driver license or state ID works for this purpose. However, please note that a driver license by itself does not prove citizenship. We still need the documents I mentioned.

[If applicant indicates document loss due to disaster]

I understand that documents may have been lost. Let me give you information about how to obtain replacement documents. We can continue processing your application, but we won't be able to issue final approval until we receive the required documentation.

[Provide Document Recovery Options sheet]

Do you have any questions about what you need to provide?"

[Tracking Your Verification Status]

"You can check the status of your immigration verification online using SAVE CaseCheck at [uscis.gov/save](https://uscis.gov/save). Once we submit your request, you'll receive a case verification number to track your case status. This won't show the result—we'll contact you with that—but confirms your case is being processed."

[If there is a verification delay]

"Your verification is under USCIS review. Track status at [uscis.gov/save](https://uscis.gov/save) using your case number [provide number]. Current processing times are at [uscis.gov/save](https://uscis.gov/save) under 'Response Times.' We'll contact you when results arrive."

## F.4 Verification Discrepancy Notice

### VERIFICATION DISCREPANCY NOTICE

Date: \_\_\_\_\_

Applicant Name: \_\_\_\_\_

Case Number: \_\_\_\_\_

Dear [Applicant Name]:

We attempted to verify your immigration status through the federal Systematic Alien Verification for Entitlements (SAVE) system as required for this federal assistance program. The verification could not be completed because:

The information provided could not be matched to federal immigration records

Additional information is needed: \_\_\_\_\_

Other: \_\_\_\_\_

### What you need to do:

You have 60 days from the date of this notice to resolve this discrepancy. You may:

1. Provide corrected or additional documentation to our office; or
2. Contact USCIS to correct your immigration records: USCIS National Customer Service Center: 1-800-375-5283, Website: [www.uscis.gov/records](https://www.uscis.gov/records)
3. For I-94 record issues, visit: <https://i94.cbp.dhs.gov>

### Important:

- Your application will remain pending while you resolve this discrepancy.
- We will NOT deny your application solely because of this discrepancy.
- If you need additional time due to circumstances beyond your control, you may request an extension.
- If you have questions, contact us at [INSERT CONTACT INFORMATION].

If you believe you have received this notice in error, or if you need language assistance, please contact us immediately.

Sincerely,

[Name and Title]

[Contact Information]

## F.5 Notice of PRWORA Eligibility Denial (SAMPLE)

### NOTICE OF PRWORA ELIGIBILITY DENIAL

Date:	_____
Applicant Name:	_____
Case Number:	_____
Program:	_____

Dear [Applicant Name]:

After completing all required verification steps, we have determined that you do not meet the federal eligibility requirements under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) for the program identified above. This letter explains the reason for this determination and your right to appeal.

### REASON FOR DENIAL

Your application has been denied for the following reason(s):

- SAVE verification returned a final response indicating you are not a qualified alien under PRWORA
- Required citizenship/immigration documentation was not provided within the allowed timeframe
- Documentation provided does not establish U.S. citizenship, U.S. nationality, or qualified alien status
- Immigration status verified through SAVE does not meet PRWORA qualified alien categories
- Other: \_\_\_\_\_

### DOCUMENTATION CONSIDERED

The following documentation was reviewed in making this determination:

### YOUR RIGHT TO APPEAL

You have the right to appeal this determination. To file an appeal:

1. Submit a written appeal within 30 calendar days of the date of this notice.
2. Your appeal must include:
  - Your name, case number, and contact information
  - A statement explaining why you believe this determination is incorrect

- Any additional documentation supporting your appeal
3. Submit your appeal to:  
[Grantee PRWORA Appeals] [Address] [Email] [Fax]

## WHAT HAPPENS DURING YOUR APPEAL

- Your case will remain open (not closed) while your appeal is pending.
- An independent reviewer who was not involved in the original determination will review your appeal.
- You will receive a written decision within 15 business days of receipt of your complete appeal.
- If your appeal is successful, your application will proceed to the next eligibility step.

**IMPORTANT:** If you do not file an appeal within 30 calendar days, this denial will become final and your case will be closed. If you need additional time to file an appeal due to circumstances beyond your control, you may request an extension by contacting us before the deadline.

## QUESTIONS OR ASSISTANCE

If you have questions about this notice, need language assistance, or require an accommodation, please contact:

[INSERT CONTACT INFORMATION]

This denial applies only to PRWORA eligibility. It does not affect your eligibility for programs that are not subject to PRWORA requirements.

Sincerely,

[Name]

[Title]

[Contact Information]

**cc:** Case File

## **APPENDIX G: SUBRECIPIENT AGREEMENT REQUIREMENTS**

### **G.1 Sample Subrecipient Agreement Language**

#### **PRWORA COMPLIANCE REQUIREMENTS**

Subrecipient shall comply with all applicable requirements of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), as interpreted by HUD, for CDBG, ESG, ESG-RUSH, HOME and HOME-ARP activities that provide direct benefits to individuals, households, or family eligibility units. Specifically, Subrecipient shall:

1. **Intake and Notice:** Use Grantee-approved intake scripts and provide uniform PRWORA notice to all applicants for covered activities.
2. **Documentation Collection:** Collect identity and citizenship/immigration documentation from all persons in the defined eligibility unit using Grantee-approved checklists.
3. **Verification:** [Model A:] Transmit all documentation to Grantee for PRWORA verification. Subrecipient shall NOT make PRWORA eligibility determinations. [Model B:] Conduct PRWORA verification through the SAVE system in accordance with Grantee procedures. Submit monthly verification reports to Grantee.
4. **Training:** Ensure all staff conducting PRWORA-related activities complete required training prior to performing such activities and annually thereafter.
5. **Civil Rights:** Apply verification requirements uniformly and without discrimination based on race, color, national origin, or perceived immigration status. Provide language access services consistent with Grantee's Language Access Plan.
6. **Data Security:** Store and transmit PRWORA documentation securely in accordance with Grantee requirements and applicable law.
7. **Records Retention:** Maintain PRWORA verification records for the period required by Grantee and applicable federal and state requirements.
8. **Monitoring:** Cooperate with Grantee monitoring of PRWORA compliance, including providing access to case files, staff interviews, and corrective action implementation.
9. **Corrective Action:** Implement corrective actions required by Grantee within specified timeframes. Grantee may suspend or terminate this agreement for persistent PRWORA noncompliance.

## APPENDIX H: MONITORING CHECKLIST

### PRWORA Compliance Monitoring Checklist

Subrecipient: \_\_\_\_\_

Monitor: \_\_\_\_\_

Date: \_\_\_\_\_

Monitoring Type:  Desk  On-Site  Follow-Up

#### Section 1: Policies and Procedures

- Subrecipient has current copy of Grantee PRWORA procedures
- PRWORA requirements incorporated in subrecipient program guidelines
- Eligibility unit defined for each covered activity
- Activity classification documented

#### Section 2: Training

- Staff training records on file
- Training completed before conducting verification
- Civil rights training completed
- SAVE user training completed (if applicable)

#### Section 3: Intake and Documentation (Sample of \_\_\_\_ Files)

- Uniform PRWORA notice provided
- Standard intake script used
- Identity documents collected
- Citizenship/immigration documents collected
- SAVE verification completed (if applicable)
- Additional verification completed when prompted
- Determination checklist complete and signed
- Supervisor review for denials
- Written notice issued

**Section 4: Civil Rights Compliance**

- Verification applied uniformly
- No evidence of selective documentation requests
- Language access provided
- LEP services documented

**Section 5: Data Security**

- PRWORA documents stored securely
- Access restricted to authorized staff
- Secure transmission methods used

**Findings Summary**

Compliant Areas:

\_\_\_\_\_

Findings Requiring Corrective Action:

\_\_\_\_\_

Corrective Action Required By: \_\_\_\_\_

Monitor Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## APPENDIX I: TRAINING REQUIREMENTS

### I.1 Required Training by Role

Role	Required Training	Frequency
All PRWORA Staff	PRWORA Overview and Requirements	Initial + Annual Refresh
All PRWORA Staff	Civil Rights and Non-Discrimination	Initial + Annual Refresh
All PRWORA Staff	Document Fraud Detection	Initial
Intake Specialists	Intake Procedures and Scripts	Initial + Updates
Eligibility Specialists	SAVE System Operation	Initial (USCIS requirement)
Eligibility Specialists	PRWORA Category Determination	Initial + Updates
Supervisors	Denial Review Procedures	Initial
SAVE Administrators	SAVE Agency Administration	Initial (USCIS requirement)

### I.2 Training Content Requirements

#### PRWORA Overview and Requirements

- Legal framework (PRWORA, HUD guidance)
- Activity classification (A/B/C)
- Eligibility unit definition
- Verification requirements
- Documentation requirements
- Penalty provisions

#### Civil Rights and Non-Discrimination

- Title VI requirements and prohibited practices
- Document abuse prevention
- Uniform application of procedures
- Implicit bias awareness
- Language access requirements
- Complaint procedures

#### SAVE System Operation

- System access and navigation
- Data entry requirements
- Response interpretation

- Additional verification procedures
- Record correction guidance
- Privacy and security requirements

### **PRWORA Category Determination**

- Qualified alien categories
- Nonqualified alien categories
- Status-to-category mapping
- Complex case handling
- Documentation requirements

### **I.3 Training Documentation**

Maintain the following for each staff member:

- Training completion certificates
- Date of training
- Training provider/method
- Acknowledgment of understanding
- Refresher training schedule

## APPENDIX J: KEY SOURCES AND LINKS

Topic	Citation/Link
HUD OGC PRWORA Interpretation	90 FR 54363 (November 26, 2025)
PRWORA – Qualified Alien Definition	8 U.S.C. § 1641
PRWORA – Verification Requirements	8 U.S.C. § 1642
PRWORA – Federal Public Benefits	8 U.S.C. § 1611
SAVE Program Information	<a href="https://www.uscis.gov/save">https://www.uscis.gov/save</a>
SAVE Prospective User Agencies	<a href="https://www.uscis.gov/save/prospective-user-agencies">https://www.uscis.gov/save/prospective-user-agencies</a>
Florida Public Records Confidentiality	F.S. § 119.071(5)(f)
Florida SAVE Mandate	F.S. § 414.095(3)(c)
Florida Cybersecurity Requirements	F.S. § 282.318
Florida Records Retention	F.A.C. 1B-24.003
False Citizenship Claims	18 U.S.C. § 1015
Document Abuse Prohibition	8 U.S.C. § 1324b
Stafford Act Nondiscrimination	42 U.S.C. § 5151
Title VI Civil Rights	42 U.S.C. § 2000d

## APPENDIX K: SUBRECIPIENT HANDOFF PROTOCOL TEMPLATE

**Instructions:** Subrecipients operating under Centralized or Hybrid verification models must complete this template and submit to Grantee for approval prior to processing PRWORA-covered applications. Retain approved copy in program files.

### SECTION A: SUBRECIPIENT IDENTIFICATION

Field	Entry
Subrecipient Name	
Subrecipient Agreement Number	
Federal Program(s) Covered	
Operating Model	<input type="checkbox"/> Centralized <input type="checkbox"/> Hybrid <input type="checkbox"/> Delegated
Effective Date	

### SECTION B: KEY CONTACTS

Role	Name	Title	Email	Phone
Subrecipient PRWORA Coordinator				
Intake Supervisor				
Grantee's Verification Contact				
Escalation Contact				

### SECTION C: DOCUMENT TRANSMISSION

#### C.1 Transmission Method (check all that apply):

- Case management system upload (specify system: \_\_\_\_\_)
- Encrypted file transfer (specify platform: \_\_\_\_\_)
- Secure portal (specify: \_\_\_\_\_)
- Other (describe): \_\_\_\_\_

#### C.2 Prohibited Methods:

Unencrypted email transmission of documents containing PII or immigration status information is prohibited.

#### C.3 File Naming Convention:

[Describe standardized file naming, e.g., LASTNAME\_FIRST\_APPID\_DOCTYPE\_DATE]

## SECTION D: NOTIFICATION PROTOCOL

### D.1 Submission Notification:

How will the verifying entity be notified when documents are submitted and ready for review?

### D.2 Completeness Check:

Who confirms documentation is complete before submission for verification?

- Intake Specialist
- Case Manager
- Supervisor
- Other: \_\_\_\_\_

### D.3 Incomplete Documentation Process:

Describe process when submitted documentation is incomplete:

## SECTION E: SERVICE LEVEL STANDARDS

Stage	Turnaround Standard
Initial verification determination	___ business days (recommended: 5)
Additional verification submission	___ business days from SAVE response
Final determination communication	___ business days from SAVE final response
Incomplete documentation follow-up	___ business days

## SECTION F: RESULTS COMMUNICATION

### F.1 Determination Results:

How will verification results be communicated to case manager?

- Case management system status update
- Email notification (to: \_\_\_\_\_)
- Shared tracking log
- Other: \_\_\_\_\_

### F.2 Applicant Notification:

Who notifies applicant of verification outcome?

- Subrecipient Case Manager
- Grantee Staff
- Other: \_\_\_\_\_

**F.3 Adverse Determination Process:**

Describe process for communicating adverse eligibility determinations to applicants, including appeal/grievance information:

**SECTION G: ESCALATION PROCEDURES**

**G.1 Escalation Triggers** (check all that apply):

- SAVE response requires additional verification beyond Step 3
- Documentation discrepancies identified
- Applicant disputes verification outcome
- Case pending > \_\_\_ business days
- System outage > \_\_\_ hours
- Other: \_\_\_\_\_

**G.2 Escalation Path:**

Level	Contact	Response Time
Level 1 (Subrecipient)		___ hours
Level 2 (Grantee)		___ hours
Level 3 (Program Manager)		___ hours

**SECTION H: APPROVAL**

By signing below, the parties confirm that these handoff procedures have been reviewed and approved for implementation.

	Subrecipient	Grantee
Signature		
Printed Name		
Title		
Date		

**Document Control:** This template is part of the PRWORA Eligibility Verification Policy and Procedures (Version 1.0). Submit completed form to Grantee PRWORA Compliance Unit. Approved protocols must be retained for the grant period plus applicable record retention requirements per 24 CFR 570.506.

## APPENDIX L: PRWORA ELIGIBILITY APPEAL REQUEST FORM (SAMPLE)

### PRWORA ELIGIBILITY APPEAL REQUEST

**INSTRUCTIONS:** Complete this form to appeal a PRWORA eligibility denial. You may also submit an appeal in letter format containing the same information. Appeals must be filed within 30 calendar days of the denial notice date.

#### SECTION A: APPLICANT INFORMATION

Applicant Name:	
Case Number:	
Program:	
Mailing Address:	
Phone:	
Email:	
Date of Denial Notice:	

#### SECTION B: GROUNDS FOR APPEAL

Check all that apply:

- New Evidence: I have new documentation that was not previously submitted
- Procedural Error: The verification process was not followed correctly
- Misapplication of Criteria: My immigration status qualifies under PRWORA
- SAVE System Error: I believe SAVE returned incorrect information
- Staff Error: There was a data entry or document review error
- Discrimination: I believe the denial was based on a protected characteristic
- Other: \_\_\_\_\_

#### SECTION C: EXPLANATION

Explain why you believe the denial was incorrect (attach additional pages if needed):

#### SECTION D: SUPPORTING DOCUMENTATION

List any documents you are attaching to support your appeal:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_

**SECTION E: EXPEDITED REVIEW REQUEST (OPTIONAL)**

I am requesting expedited review due to urgent circumstances

If checked, explain the urgent circumstances:

**SECTION F: CERTIFICATION AND SIGNATURE**

I certify that the information provided in this appeal is true and correct to the best of my knowledge. I understand that providing false information may result in denial of benefits and/or criminal penalties.

Signature: _____	Date: _____
Printed Name: _____	

If filed by authorized representative:

Representative Name: _____	Relationship: _____
Representative Signature: _____	Date: _____

**Submit to:** [Grantee PRWORA Appeals] | [Address] | [Email] | [Fax]

[END OF DOCUMENT]

Document prepared for Grantees of CDBG-DR programs and updated by Orange County Housing and Community Development Division staff.

*This document should be reviewed by legal counsel and updated as HUD issues additional guidance.*