

Texas Department of Housing and Community Affairs
Systematic Alien Verification for Entitlements (SAVE) and U.S. Citizenship Documentation
Questions and Answers

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

1. Reference Welfare Act §432, 8 USC 1642(b)
2. Complete the [SAVE Overview Webinar](#)
3. Review ALL documents posted on the U.S. Citizenship and Immigration Services' [SAVE Resource Page](#) (SAVE Website)
4. Review ALL documents on the [Household Status Verification Page](#) (TDHCA Website)

If after following the above steps, and reading this document, you still have questions, you may submit a program question by completing this form:

<https://tdhca.wufoo.com/forms/request-for-ca-program-assistance/>.

Please note: unless otherwise specified, all forms and documents mentioned in this FAQ are available on the Department's [Household Status Verification Page](#).

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General Information

1. Where can I find the SAVE webinar?

The SAVE webinar is found on the USCIS website here:

<https://www.uscis.gov/save/resources/save-webinars>.

2. Do Subrecipients have to verify U.S. Citizenship, U.S. National status, or Qualified Alien Status for everyone in the household?

Yes.

- If the household member is a U.S. born citizen with proper support documentation, do not use the SAVE system. Complete the *Household Status Verification (HSV)* form appropriately and proceed as applicable.
- If the household member is a Qualified Alien, use the SAVE system to verify the document being presented to establish Qualified Alien status:
 - If the client is verified immediately by the system, print out the results and place them in the client file with the *HSV form*.
 - If a household member is not verified immediately, perform additional verification steps, print out the results and place in the client file with the *HSV form*. Until all household members are verified the application is considered incomplete.
 - If after all verification steps are completed the household member is still not verified, provide information on contacting USCIS and document in case notes. For the client file, print out the results and place in the client file with the *HSV form*.

3. Are we required to complete a new *Household Status Verification Form* each program year?

A *Household Status Verification Form* is required for all applicants, but a new form is not required annually. If the household composition has not changed, you may reuse the form if you verify its accuracy. Keep in mind that any household members who must be validated via the SAVE System must be verified each program year and a printout of the verification maintained in the client file. U.S. Citizens/U.S. Nationals verifications may be carried forward to successive program years, as this verification must only be obtained once. If the household composition has changed, you should use a new *Household Status Verification Form*.

4. Do we have to retain copies of the documents used to establish proof of U.S. Citizenship, U.S. National status, or Qualified/Unqualified Alien Status?

No, subrecipients should not retain copies of individuals' documents. They should only be reviewed and recorded on the *Household Status Verification Form* to establish U.S. Citizenship, U.S. National status, or Qualified/Unqualified Alien Status for each member of a household applying for assistance.

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5. Do copies of documents used to establish U.S. Citizenship, U.S. National status, or Qualified Alien Status need to be retained in the case file?

Proper documentation will consist of a completed and signed, by both the applicant and agency staff, *HSV Form* placed in the client file. Copies of other citizenship/identification documentation should not be retained.

6. Regarding elderly applicants who apply for services via an authorized representative. Will the authorized representative be able to sign the HSV form on behalf of the elderly applicant and provide the applicant's documents?

Only individuals who have documented power of attorney, legal guardianship, or parental control may sign on behalf of a client. Otherwise, the client must sign all necessary documents, or the application is incomplete.

7. What if a household member claims to be a U.S. born citizen but cannot provide documentation of their status?

Any individual that cannot provide documents that establish their status as a U.S. citizen, U.S. National, or Qualified Alien must be treated as an unqualified alien including U.S. born citizens that cannot provide documentation as outlined in the [Acceptable Documentation for Establishing Legal Status or US Citizenship and Identity Flowchart](#).

8. Can we serve households with unqualified aliens?

Any household with a mixture of US Citizens/US Nationals/Qualified Aliens and Unqualified Aliens can be served if they meet eligibility requirements. Income eligibility would be calculated by including the income of all adult household members, regardless of status, but excluding unqualified aliens when determining household size, as described in the TAC.

9. Can we verify an applicant is currently registered to vote by going to the SOS or Tax Assessor websites in place of a voter registration card?

Yes.

10. Do individuals with a certificate of citizenship or a certificate of naturalization have to be verified via SAVE annually?

Certificates of Citizenship (Form N-560 or N-561) and Certificates of Naturalization (Form N-550 or N-570) only need to be run through SAVE once, as they do not expire and are not subject to change, unlike many other immigration documents. A copy of the SAVE Verification should be maintained in the client file.

11. Should unqualified aliens be included in program reporting (MPRs)?

Yes, data should be reported for all household members, regardless of their status.

Establishing U.S. Citizenship for U.S. Born Citizens

1. What are the acceptable forms of documentation for establishing U.S. citizenship?

Please refer to the [Acceptable Documentation for Establishing Legal Status or US Citizenship and Identity Flowchart](#) found on the [Department's Household Status Verification Page](#).

2. If a copy of the Birth Certificate does not have a seal, is it acceptable documentation?

Yes, photocopies are acceptable, as well as birth certificates or records without a seal, if they were issued by the appropriate State Bureau of Vital Statistics or equivalent agency

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from a U.S. state or local government, a U.S. commonwealth or territory, or the District of Columbia.

3. Can birth certificates issued by a U.S. hospital be used to establish U.S. citizenship?

You must read the fine print on birth certificates issued by hospitals. If the birth certificate indicates that the certificate is a souvenir or if it states that the birth will be filed with the state (or local government entity), it is not acceptable, and you have to get the official certificate.

4. Can baptismal forms issued by the applicants' religious institution be used to establish U.S. citizenship?

No. A baptismal form is not the same as a birth certificate in that the form would not be issued by a State Bureau of Vital Statistics or equivalent agency from a U.S. state or local government, a U.S. commonwealth or territory, or the District of Columbia. It can be used to establish citizenship if in conjunction with another piece of secondary documentation, as referenced in the [Acceptable Documentation for Establishing Legal Status or US Citizenship and Identity Flowchart](#).

5. Can the Texas Election Identification Certification (EIC) be used as proof of U.S. citizenship or identity?

No. Texas has established that the EIC is not valid for identification purposes and thus the Department has determined that it cannot be used for proof of U.S. citizenship or identity.

6. Do we have to deny elderly applicants services because they can't provide documentation to establish his/her citizenship?

U.S. Citizenship, U.S. National status, or Qualified Alien Status must be determined for all applicants. Please refer to the [Acceptable Documentation for Establishing Legal Status or US Citizenship and Identity Flowchart](#) for a complete list of acceptable primary and secondary documentation for U.S. born citizens. Unfortunately, if an applicant does not have these, even elderly applicants, they will need to obtain the proper documentation or not receive services.

7. What is a form DS-10?

This is a U.S. Department of State form (available at <http://eforms.state.gov>) that can be used as a secondary citizenship document. It must be notarized. This form provides a way for an "identifying witness" to describe what they know about the birth facts of person they are identifying. This should be someone that has first-hand knowledge of the household member's birth in the U.S.

Establishing U.S. Citizenship, U.S. National status, or Qualified Alien Status

1. What forms of documentation will household members need to provide for us to review to establish U.S. Citizenship, U.S. National status, or Qualified Alien Status?

Refer to the [Acceptable Documentation for Establishing Legal Status or US Citizenship and Identity Flowchart](#) for a complete list of acceptable primary and secondary documentation of for U.S. born Citizens and U.S. Nationals and the [Commonly Used Immigration Documents | USCIS](#) for acceptable documentation for Qualified Aliens.

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2. Will a Social Security card, or Social Security or SNAP/TANF award letters be sufficient for verification of U.S. Citizenship, U.S. National status, or Qualified Alien Status?

No. These documents alone are not acceptable documentation for proof of U.S. Citizenship, U.S. National status, or Qualified Alien Status. Refer to the [*Acceptable Documentation for Establishing Legal Status or US Citizenship and Identity Flowchart*](#) for a complete list of acceptable primary and secondary documentation of for U.S. born citizens and the [Commonly Used Immigration Documents | USCIS](#) for acceptable documentation for Qualified Aliens.

3. Can expired documents be used to establish U.S. Citizenship, U.S. National status, or Qualified Alien Status?

Refer to the [*Acceptable Documentation for Establishing Legal Status or US Citizenship and Identity Flowchart*](#) for a complete list of acceptable primary and secondary documentation of for U.S. born citizens and the [Commonly Used Immigration Documents | USCIS](#) for acceptable documentation for Qualified Aliens.

Qualified Aliens

1. Who is a Qualified Alien?

Qualified Aliens are defined in 10 TAC §6.2(45): Qualified Alien – A person that is not a U.S. Citizen or U.S. National and is described at [8 U.S.C. §1641\(b\) and \(c\)](#).

2. If an applicant presents a birth certificate listing them born in another country and has a government-issued ID Card, can we assist them without verifying citizenship?

No, unless they were born in one of the U.S. Commonwealths and Territories listed here:

- Puerto Rico
- U.S. Virgin Islands
- American Samoa (including the Swains Island)
- Guam
- The Panama Canal Zone between February 26, 1904, to October 1, 1979 (if at least one parent was a U.S. Citizen)
- The Commonwealth of the Northern Mariana Islands after November 3, 1986
- The Philippines before July 4, 1946

These individuals may be U.S. National or U.S. Citizen and should provide the same documentation as any other U.S. Citizen.

If they were born in a foreign country to U.S. parents, they may have U.S. citizenship documented by a Consular Report of Birth Abroad, Certification of Report of Birth, or Certificate of Citizenship. Because Certificates of Citizenship can also be acquired through other means, they should be run through the SAVE system.

If they were born in a foreign country, and not to U.S. parents, they will need to present documentation of their Qualified Alien status and you will need to verify through SAVE.

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Unqualified Aliens

- 1. What if we complete the *Household Status Verification Form* and not all household members are U.S. Citizens, U.S. Nationals, or Qualified Aliens?**

They may possibly be served as a mixed-status household. To determine this, the household income must include the income of all household members age 18 or older, regardless of U.S. Citizenship, U.S. National status, or Qualified Alien Status. When determining household size include only U.S. Citizens, U.S. Nationals, or Qualified Aliens. If they still income-qualify, then they may be served.

- 2. If none of the adults in the household are U.S. Citizens, U.S. Nationals, or Qualified Aliens, can one of them still sign the application and the *Household Status Verification Form*?**

Yes, one of the adults would sign since children under age 18 cannot sign. However, someone in the household must have legal status to receive benefits. A household with no one qualifying cannot be assisted.

- 3. If the only vulnerable household member is a Non-Qualified Alien, is the household still considered Vulnerable?**

No. This household would be treated as a non-vulnerable household for purposes of determining priority and benefits.

- 4. If a HH member is determined unqualified, but their potential status changes over time, could they be re-run through SAVE to determined eligible?**

Yes. If an applicant has potential changes in eligibility status, Subrecipients could utilize the *Acceptable Documentation for Establishing Legal Status or US Citizenship and Identity Flowchart* or SAVE to update/change their eligibility status. A new HSV form would be needed to support this change.

Application Process

- 1. What should we do in the case of applicants that do not bring all necessary documents to prove U.S. Citizenship, U.S. National status, or Qualified Alien Status?**

Applications are not complete until the U.S. Citizenship, U.S. National status, or Qualified Alien Status can be determined for each household member. Subrecipients should establish a policy regarding how long applicants have to return the necessary documentation before the application is denied and ensure that the policy is followed consistently for every application.

- 2. Can we help people born in the U.S. who don't have the money to purchase a birth certificate?**

You may use available non-federal unrestricted funds to assist applicants in acquiring necessary documentation.

SAVE Process

- 1. Is there a written manual on how to verify alien status?**

Please refer to the [Household Status Verification Page](#), which has a variety of resources, as well as a link to the U.S. Citizenship and Immigration Services' SAVE Resource Page which has tutorials and reference materials.

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

No. We are not a law enforcement agency, so that is not required.

- 3. Do I need to run all household members through the SAVE system?**

No. If the household members can prove their citizenship or national status, there is no need to run through SAVE. Any other household members should run through the SAVE system.

- 4. Once we conduct the initial verification in SAVE, if we are prompted with “Need Additional Verification” will we be able to input the additional information at a later date if the applicant does not have any other information that we can use at the time of intake?**

The SAVE system will keep the search in the same status until you enter additional information. Most of the identification documents can be received within 4-6 weeks. Subrecipients should develop a written policy regarding how long applicants have to return the necessary documentation before the application is denied and ensure that the policy is followed consistently for every application. Once the additional documents are obtained, search for the household member within the SAVE system to add the additional information. Do not create a new search.

Special Considerations for Children Under age 18

- 1. How can I establish identity for children under age 18?**

You can establish identity for children either using the same documents as for adults, or you can have the parent identify the child by:

- Establishing parental/guardian relationship using one of the documents listed in the *Acceptable Documentation for Establishing Legal Status or US Citizenship and Identity Flowchart* (the document must list the name of the parent(s)/guardian(s)) **and**
- Identifying the named parent/guardian using acceptable primary or secondary documentation, as referenced in the *Acceptable Documentation for Establishing Legal Status or US Citizenship and Identity Flowchart*.

- 2. How can we document the guardian relationship for foster children?**

Foster parents should have a Department of Family and Protective Services Form 2085FC (Placement Authorization) which documents the foster parent’s guardianship.

- 3. How can we document the guardian relationship in informal custody arrangements, such as a grandparent taking care of their grandchild without formal custody.**

Informal custody relationships should be documented using an unexpired, notarized *Authorization Agreement for Voluntary Adult Caregiver* form (available from the Texas Department of Family and Protective Services [Website](#)) signed by at least one of the child's parents or legal guardians.

- 4. Do we need to document parent/guardian relationship for every child?**

You only need to document parent/guardian relationship if you are using that relationship to confirm the identity of a child.