

Department of Social and Health Services  
Olympia, Washington  
**EAZ Manual**

Revision # 1313  
Category Citizenship and Alien Status for Temporary Assistance for Needy Families (TANF)  
Issued 01/28/2025  
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**Summary**

Updated clarifying information to remove COFA citizens from the list of non-qualified immigrants that are eligible for SFA in alignment with a change to federal rules allowing eligibility for TANF for this population. ACES supports the change in eligibility from state to federal benefits effective with March 2025. Also made minor cosmetic changes (e.g., correcting numbers and spacing).

Updated January 28, 2025

See below for edited text:

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[Citizenship and Alien Status - For Temporary Assistance for Needy Families \(TANF\) | DSHS](#)

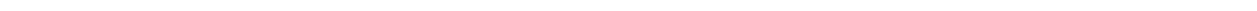
Revised ~~April 16, 2019~~ January 28, 2025

Purpose:

This section provides information on how a person’s immigration status affects their eligibility for Temporary Assistance for Needy Families (TANF)

[WAC 388-424-0010](#) Citizenship and alien status - Eligibility for TANF

- [Clarifying Information and Worker Responsibilities](#)



Clarifying Information - [WAC 388-424-0010](#)

1. Provide clients who are Lawful Permanent Residents (LPR) with information about naturalization assistance services offered by local community agencies through the DSHS Office of Refugee and Immigrant Assistance. See the Social Services Manual, SSI Facilitation - Facilitation Process - SSI Facilitation Process for more information on the Department's naturalization assistance program.
2. Take a client's declaration of U.S. citizenship at face value. Don't routinely request proof of citizenship unless there is a specific and substantive reason to, such as an inconsistency in a client's statements or in the information presented on their application for benefits.
3. Consider immigrants, who are not eligible for federal TANF because of the five-year bar on federal benefits, for the state funded benefits programs.
4. The following non-qualified aliens are lawfully present and aren't eligible for TANF, but could be eligible for state funded benefits, if they meet all other eligibility criteria:
  - Pending applicants for Asylum, or Withholding of Deportation/Removal under the Convention Against Torture (CAT) if :
    - Over age 14 with an approved work authorization or
    - Under 14 and their application has been pending for 180 days or more;
  - Aliens granted withholding of removal under the Convention Against Torture (CAT);
  - Aliens paroled into the U.S. for less than 1 year;
  - Aliens in current Temporary Protected Status (TPS) or Aliens granted deferred action status, with the exception of Deferred Action Childhood Arrivals (DACA);
  - Family Unity beneficiaries;
  - A child who has a pending application for Special Immigrant Juvenile status;
  - ~~Citizens of the Marshall Islands, Micronesia and Palau. These persons have special rights under compacts of Free Association and are lawfully allowed to enter, reside and work in the U.S., but they aren't U.S. citizens or nationals. They are lawfully present non-qualified aliens unless they have some other immigration status.~~
  - "U" visa holders;
  - Religious workers under section 101(a)(15)(R) of the INA;
  - An individual with a petition pending for 3 years or more, as permitted under section 101(a)(15)(V) of the INA;
  - A fiancé of a citizen, as permitted under section 101(a)(15)(K) of the INA;
  - Other aliens with a current nonimmigrant status

**EXAMPLE** A client applying for benefits has an I-94 (Arrival/Departure Record) stamp with a "B2" code that is not expired. According to the NILC Guide, "B2" signifies tourist status. A person with a tourist status is a lawfully present nonimmigrant and, if otherwise eligible may qualify for benefits. However, an alien with B2 visa is in the U.S. only temporary and doesn't meet Washington state residency requirements,

**EXAMPLE** A five-person family applies for benefits. The father has a Lawful Permanent Resident card (I-551), but the mother and three children only have Employment Authorization Documents (EADs). All four EADs are coded "A15". According to the [NILC Guide](#), the "A-15" code indicates "V" status. These are spouses and children of lawful permanent residents whose visa petitions have been pending for at least three years. Immigrants with "V" status are lawfully present non-qualified aliens. These immigrants may qualify for state benefits. The father may be eligible for federal benefits depending on other factors such as date of entry into the U.S.

**EXAMPLE** A mother and child applied for benefits. The mother has a valid I-94 Arrival/Departure form stamped with a "U" visa. The child would likely have been included as a dependent on the mother's U visa application. Both mother and child are considered "lawfully residing" and may be eligible for state benefits.

5. Immigrant children and pregnant women, who are:

- lawfully present non-qualified aliens, as defined in [WAC 388-424-0001](#); and
- meet residency requirements of [WAC 388-468-0005](#),

are eligible for federally funded medical benefits, unless they are approved under Deferred Action Childhood Arrivals (DACA).

6. Staff should check eligibility for State Family Assistance (SFA) and Food Assistance Program (FAP), when an applicant is a Deferred Action Childhood Arrivals (DACA) individual.

**NOTE:** An Employment Authorization Document (EAD, USCIS form I-765), known popularly as a work permit, is a document issued by the United States Citizenship and Immigration Services (USCIS) and it gives noncitizens a temporary **authorization to work**. EAD doesn't confer immigration status, but for eligibility determination purposes, it indicates the client's current immigration status.

Aliens with a variety of statuses may be issued an EAD. Unless other current immigration document(s) are provided, an expired EAD means a person's immigration status has expired.

For more information about I-765 EAD Category Codes please see Employment Authorization Document, Category Codes

Worker Responsibilities - [WAC 388-424-0010](#)

1. Always ask client for an INS Number, also known as Alien Number, or Alien Registration number, or USCIS Number #. It usually begins with an "A" followed by a seven, eight, or nine

digit unique number assigned by the Department of Homeland Security (DHS) to each alien who is admitted to the United States, or who came into contact with the agency (Example: application for asylum). "A" number is listed on all documents and DHS correspondence. Enter the INS Number and Date of Entry in 3G.

2. Gather all the information necessary to determine eligibility as described in [WAC 388-424-0001](#), [WAC 388-424-0006](#), [WAC 388-424-0007](#), [WAC 388-424-0008](#), and [WAC 388-424-0009](#). Document immigration status, date of entry, armed service/veteran status, work quarters, and SSN information in ACES. Inform any client who is subject to the five-year bar of the expiration date of their five-year bar and of the need to inform the Department if family members become citizens (including parents who have children under 18).

**NOTE:** Once the SSN is federally verified, ACES will send back to SSA to verify citizenship status. If SSA cannot verify citizenship, MPA will receive an alert to work with the client to verify citizenship.

1. For aliens who have an Affidavit of Support form (I-864) filled out on their behalf, be sure to determine work quarters and citizenship status. If the affidavit is still in effect:
2. See [WAC 388-450-0155](#) and [WAC 388-450-0156](#) to determine if sponsor deeming applies;
3. See [WAC 388-450-0160](#) for treatment of the sponsor's income; and see [WAC 388-470-0060](#) for treatment of the sponsor's resources.

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ACES Procedures

### **Alien Emergency Medical**

- See Medical - Alien
- See TANF Processing for Special Immigrants