



## Questions and Answers from Enrollment Audit Training School Year 2012-2013

### ***PROOF OF INCOME-PAY STUBS AND FINANCIAL ASSISTANCE***

**Q1: May electronic pay stubs be submitted?** A1: Yes, as long as home address of the person seeking to enroll the student is on the electronic pay stub and it shows evidence of withholding of District of Columbia taxes.

**Q2: Dc.gov checks no longer have the DC address but shows withholdings, what should a school do?** A2: There is a way to show addresses on DC.gov pay stubs. Please instruct the parent/guardian to go online the PeopleSoft system and check the box for “non PDF” version of the pay stub to print, which shows the address.

**Q3: What if the withholding amount on the pay stub is \$0?** A2: As long as the home address of the person seeking to enroll the student is on the pay stub and the pay stub lists District of Columbia as the state for local taxes, the withholding *amount* is inconsequential.

**Q3: Can we use a pay stub that shows “local tax” and does not specify the District of Columbia as the parent/guardian’s local taxes for residency verification?** A3: No, if the pay stub only says “local” and does not specify the District of Columbia, it may not be used for residency verification.

**Q5: Can an unemployment pay stub be used for residency verification?** A5: Yes, as long as it lists the name and address of the person seeking to enroll the student, it can be used as documentation of financial assistance from the District of Columbia government for residency purposes.

**Q6: TANF no longer issues re-certification letters. Can the TANF “Case Profile Page” print-out be used as documentation of financial assistance?** A6: Yes, as long as it shows their name and address and that they are currently receiving assistance.

**Q7: What is the 45-day rule for proof of residency— 45 days from when?** A7: A pay stub, with an issue date within the past forty-five (45) days, that contains the name of the caregiver enrolling the student, shows his/her current DC home address, and withholding of DC income tax for the current tax year.

**Q8: If a person seeking to enroll a student brings in a copy of their District of Columbia income tax form certified by the Office of Tax and Revenue, without the tax information authorization waiver, can that be used to prove residency?** A8: Yes.

### ***UTILITY BILLS***

**Q1: If the person seeking to enroll the student brings in a Pepco bill that has been stamped “paid” by Pepco, is that sufficient for the utility bill requirement?** A1: Yes.

**Q2: What if the person seeking to enroll the student is receiving energy assistance so they don't owe any money to the utility company?** A2: The person should bring in documentation that they are receiving financial assistance from the District of Columbia. If they are not paying a bill, they will not have a receipt to submit.

**Q3: What if the person seeking to enroll the student brings in two months of utility bills, with the second month showing that the previous month was paid?** A3: Yes, that would meet the criteria for a paid receipt.

**Q4: What if the person seeking to enroll the student brings in a bank statement showing that the utility bill was paid?** A4: Yes, if the bank statement explicitly says that the payment was made to the utility company (not simply that a payment was made in the amount owed), then that would qualify as a receipt or canceled check.

**Q5: What if the person seeking to enroll the student pays a utility bill by money order – how do they submit a receipt?** A5: Money orders come with multiple copies, one of which should be retained by the purchaser as the receipt. If they did not keep the copy to serve as the receipt then they will need to use another form of documentation to prove residency.

**Q6: Can we accept P.O. Box addresses as proof of residency?** A6: No, additional information with the caregiver's physical address on it is needed. Often a utility bill will show the address where the service occurs, which is acceptable.

### ***LEASES***

**Q1: What if the lease is expired, but the person seeking to register the student is now month-to-month in the apartment?** A1: If the person seeking to register the student is living in a month-to-month arrangement, they can bring in the original lease and a canceled check from the previous month as proof of residency.

**Q2: What if the lease payment is \$0 because the person seeking to register the student receives housing assistance?** A2: The law requires both a lease and proof of payment in order to satisfy the residency verification. In circumstances where the lease is paid through public assistance, the person seeking to enroll the student should provide a copy of their Housing Authority letter to meet the residency verification standards.

### ***RETENTION OF DOCUMENTATION***

**Q1: What about parents who sign a form declining residency verification record maintenance?** A1: Any parent who does not want the school to keep copies of their documentation on file must sign the Parent Residency Verification Retention Form. In such a case, the school is required to retain this form along with the completed residency verification form. During the audit, the auditors may request to see parents' back-up documentation to prove residency and schools will then be required to obtain the documentation (as stated on the Retention Form).

**Q2: Are schools required to keep/maintain back-up documentation used to verify DC residency?** A2: Yes, all schools are required to keep back-up documentation, unless there is a completed Parent Residency Verification Retention Form, Homeless Referral Form or Home Visitation Residency Verification Form. Note, when a school signs the residency verification form, the school certifies that "all supporting documentation to this form will be retained by the school and made available to OSSE, external auditors, and other agencies..."

**Q3: Are schools required to present residency verification back-up documentation to auditors upon request?** A3: Yes, schools are required to present the back-up documentation at the auditor's request. Note, when a school signs the residency verification form, the school certifies that "all supporting documentation to this form will be retained by the school and made available to OSSE, external auditors, and other agencies..."

### ***OTHER QUESTIONS***

**Q1: Does the same person need to both enroll the student and prove residency?** A1: Yes. The residency requirements state that residency must be proven by the person seeking to enroll the student. In the event that no proof of residency is available in name of the caregiver seeking to enroll the student, the school is encouraged to request and conduct a home visit as a means of proving residency. In some cases where a home visit is not possible, the school is encouraged to request any other documentation that may support the caregiver's residency claim. For example, the caregiver may provide a notarized letter stating that he/she lives with another person and provide that persons proof of residency. Such information may prove useful during the residency appeal stage.

**Q2: If two parents are on the enrollment paperwork, can they submit one document in one name and another document in the other's name as evidence of residency?** No, the residency documentation must show the name and DC address of one person whether documents from list A or list B are provided. If the documents presented are from List B, which require two (2) items, both items need to be in the same name.

**Q3: If a parent has a change of address to a DC address, should the school re-do the residency verification form?** A3: If they are moving from one DC address to another, they do not need to re-do the form. If they are moving from out-of-state they should prove DC residency as they change addresses.

**Q4: For shared guardianship with MD/VA, is there an amount of time child must be living in DC?** A4: They should live in DC 50 percent or more of the time and provide proof of DC residency.

**Q5: Is the documentation to prove residency by October 5<sup>th</sup> or for 10 days from the headcount?** A5: The parent/guardian or adult student must prove residency by October 5<sup>th</sup> or within 10 days of the time of initial enrollment—*whichever occurs later*.

**Q6: What is the process for residency verification for a primary care giver other than the student's guardian?** A6: If the person enrolling the student is another primary caregiver (a person other than a parent or court-appointed custodian or guardian), he/she must establish status as other primary caregiver in accordance with DC law. These other primary caregivers must also establish DC residency the same way a parent or guardian would establish residency.

**Q7: What is the requirement when a school suspects residency fraud?** A7: If a school or LEA suspects residency fraud or if OSSE is notified of potential residency fraud, the LEAs and schools are required to notify OSSE and the LEA is required to conduct an investigation of the allegation and prepare a case to submit to OSSE for referral to the OAG for potential prosecution.