



**State of Florida
Department of Children and Families**

Ron DeSantis
Governor

Taylor N. Hatch
Secretary

DATE: July 17, 2025 **TRANSMITTAL NO.:** P-25-07-0002

TO: Economic Self Sufficiency Operations Managers
Economic Self Sufficiency Program Offices
Office of Public Benefits Integrity Staff

FROM: Julie Reed, Chief, Program Policy
Timothy Duggan, Chief, Benefit Investigations
(Signatures on File)

SUBJECT: Updated Customer Authentication Process for FA, TCA, and RAP

EFFECTIVE: Upon Receipt

This transmittal provides updated policy and procedures on the Customer Authentication (CA) process for Food Assistance (FA), Temporary Cash Assistance (TCA) and Refugee Assistance Program (RAP). There are no changes to the existing policy that CA is **not** required for Medicaid applications, renewals, or requests for additional assistance. Continue to verify the identity of all household members applying for Medicaid and do not delay Medicaid when an applicant's identity is verified but is pending authentication for other programs.

This transmittal obsoletes Transmittal P-21-11-0013 and supersedes all prior guidance related to the CA process.

Current Policy

CA is mandatory for all FA and TCA applications, renewals, and requests for additional assistance that require an interview as referenced in policy passages 1410.0400.01 Customer Authentication (FS) and 1420.0400 Customer Authentication (TCA).

Updated Policy

In addition to the current policy, the verbal CA process must now be used on all **passive** applications, renewals, and requests for additional assistance that either return a "Not Authenticated" system alert or does not display a system alert for authentication regardless of the interview requirement. The updated CA process applies to online and paper applications received for FA, TCA and RAP.

Furthermore, supervisors no longer have the discretion to excuse applicants from the CA process. Refugees applying within 12 months of their date of entry are now required to complete CA.

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Mission: Work in Partnership with Local Communities to Protect the Vulnerable, Promote Strong and Economically Self-Sufficient Families, and Advance Personal and Family Recovery and Resiliency

Customer Authentication Methods

CA is a two-step process that "discovers" and "authenticates" an applicant's identity. Once the applicant's identity is both discovered and authenticated, the technical eligibility factor of identity is established. There are three methods in which the CA process may be completed: **electronic CA**, **verbal CA**, or **face-to-face CA**. In the case notes, electronic CA is identified as automatic, while verbal and face-to-face CA are identified as manual.

1. Electronic Customer Authentication

The Department contracts with a provider to administer a CA tool for online applications. The CA tool establishes that the applicant's identity exists and verifies the individual submitting the application is who they say they are. As part of the electronic CA process, which is used for online applications, the applicant is prompted to answer a series of multiple-choice questions generated from the provider's database using their CA tool. These questions are based on personal information only the applicant should know and is triggered at the end of the online application. If the applicant opts out by choosing not to answer the authentication questions or fails authentication by not answering three out of four questions correctly, staff must complete the verbal CA process.

2. Verbal Customer Authentication

The verbal CA process must be used on paper and online applications, renewals (including passive), and requests for additional assistance that return a "Not Authenticated" system alert or does not display a system alert for authentication regardless of the interview requirement.

When completing verbal CA, staff must ask questions that only the applicant should know selected from the revised **Customer Authentication Question Bank** attached below.

Do **not** ask questions that are:

- Common knowledge such as: "What is your current address?"
- Accessible through public records search such as: "Have you ever been incarcerated?"
- Potentially available to someone committing identity theft or fraud
 - This includes information that appears on the face of a state ID or driver's license such as height, DOB, sex, or date of issuance.

As part of the verbal CA process, staff must prioritize DAVID as the primary electronic source to authenticate an applicant's identity. Staff are required to follow the procedures outlined in [Transmittal I-23-04-0007](#) for updating the comment field in DAVID. If no DAVID record is available or insufficient information is available to complete CA, staff must then use SAVE for applicants with a non-citizen status or CCIS for applicants who pay or receive child support. MNOV, DES0, FLORIDA, and

the ACCESS Worker Portal should only be used when information from the primary and secondary electronic sources are not available.

Using information retrieved from the selected electronic source, staff **must** identify four questions from the Customer Authentication Question Bank to ask the applicant. The applicant must answer three out of four authentication questions correctly to pass the verbal CA process and authenticate their identity. Staff may stop asking authentication questions if the applicant answers the first three questions correctly. If the applicant fails verbal CA, they must be pended to visit their local Family Resource Center for face-to-face CA. Staff must document which specific electronic source was used to complete verbal CA and the outcome in the case notes.

Note: If staff are unable to reach the applicant by phone, the applicant must be pended to contact the Department to complete the verbal CA process.

Questionable Completion of Verbal Customer Authentication

If authentication is marked as completed in the ACCESS Worker Portal but case notes are not properly documented with “manual” as the authentication method, including comments detailing which system was used, and the outcome of the authentication, proceed as if verbal CA was not completed. Contact the applicant to complete the verbal CA process.

If the verbal CA process is documented in the case notes as completed but “Authenticate Identity” is not selected in the ACCESS Worker Portal, follow up with the staff member who completed the authentication to ensure the ACCESS Worker Portal is updated accordingly.

3. Face-to-Face Customer Authentication

When completing the face-to-face CA process, Family Resource Center staff must verify the applicant’s identity by comparing the applicant to their photo identification or other acceptable verification of identification per policy passage 1410.0400 Identity (FS). Acceptable verification of identification submitted for FA may also be used to establish the applicant’s identity for TCA and RAP. A copy of the applicant’s verification of identity must be made and stamped with the CA stamp.

Family Resource Center staff are required to:

- Complete all fields within the stamp, including the Family Resource Center location, date of authentication, name of the individual authenticated, application number or Social Security number, and the signature of the staff member conducting the authentication.
- Upload the completed verification into the Worker Portal if the applicant is known to the system or fax the completed verification to the Document Processing Center.
- Select the face-to-face CA option in the ACCESS Worker Portal.
- Document all actions of the face-to-face CA in the case notes.

Questionable Verification of Identity Documents

If an applicant provides questionable verification of identity during the face-to-face CA process, Family Resource Center staff are required to accept the verification and complete all the steps in the face-to-face CA process. Family Resource Center staff must document case notes with a statement indicating what appears questionable about the submitted verification of identity that was provided during the face-to-face CA.

Office of Public Benefits Integrity (OPBI) Referrals

If an applicant completes the face-to-face CA process, but their identity remains questionable, staff must submit a referral to OPBI. To submit a CA-related referral to OPBI, select "Identity" as the referral reason by placing an "X" in the option 2 field on FLORIDA screen AIFP.

Representatives

If a representative applies on behalf of a household, the identity of both the applicant and representative must be verified. The applicant or representative is required to complete the CA process based on personal information about the applicant.

- If the applicant or representative correctly answers three out of four authentication questions during the electronic CA process, the applicant's identity is verified.
- If the applicant or representative opts out, fails, or submits a paper application, the verbal CA process must be completed.
- If the applicant or representative fails verbal CA, the applicant must be pended to visit their local Family Resource Center for face-to-face CA.

Note: The representative must be appointed on the application or form CS-ES 3010 must be in the case file prior to attempting CA or discussing any case information.

Special Circumstances

- **Elderly Simplified Application Project (ESAP) Households:** Applicants participating in the ESAP demonstration project can have their identity verified using electronic data matches unless no information exists, or their identity is questionable. Refer to [Transmittal I-24-09-0022](#) for more information about the ESAP demonstration project.
- **Community Partner Interviewer (CPI) Households:** Applicants who apply through the CPI demonstration project will have their identity verified by the CPI. The applicant completes their eligibility interview directly with the community partner. Staff can identify CPI applications by reviewing the ACCESS Worker Portal; CPI-submitted applications will include a partner ID number. Additionally, CPI staff will submit interview notes and required verifications through the ACCESS Worker Portal.
- **Residents of Drug or Alcohol Treatment Facilities:** Applicants residing in a drug or alcohol treatment facility are not required to complete the CA process when a representative of the facility applies on their behalf.

System Alerts and Actions

System alerts will appear on the bottom left of the Work Item Details page and on the top of the Application Summary in the ACCESS Worker Portal.

Identity Discovered: The CA tool matches the applicant's name, Social Security Number (SSN), and date of birth (DOB) from the online application to verify the applicant exists.

- **ID Discovered** displays when the applicant's name, SSN, and DOB match.
- **ID Not Discovered** displays when the applicant's identity based on the name, SSN, and DOB provided on the application is not verified.
- **DOB Verified but SSN and Full Name Mismatched** displays when the applicant's name and SSN does not match.

Authentication: The CA tool uses a series of personal multiple-choice questions to verify that the individual submitting the application is who they say they are.

- **Authenticated** displays when the applicant passed the electronic CA process.
- **Not Authenticated** displays when the applicant opted out or failed the electronic CA process.

Deceased displays when the applicant is verified as deceased based on the information provided on the application.

Incarcerated will display when the applicant is verified as incarcerated based on the name, SSN, and DOB provided on the application. For incarcerated individuals, the alert will include the State of incarceration.

Verbal CA must be completed on all FA, TCA and RAP applications, renewals, and requests for additional assistance that return a "Not Authenticated" system alert **and** when there is no authentication system alert regardless of the interview requirement.

Staff must complete the verbal CA process on all applications and renewals (including passives) with the following system alerts:

- ID Discovered and Not Authenticated
- ID Not Discovered and Not Authenticated
- DOB Verified but SSN and Full Name Mismatched and Not Authenticated
- ID Discovered and no authentication system alert displayed
- ID Not Discovered and no authentication system alert displayed
- No system alerts displayed for identity and authentication

Case Notes

- **Automatic:** Select "automatic" from the dropdown list when the applicant successfully completed the electronic CA process.
- **Manual:** Select "manual" from the dropdown list when the applicant completed the verbal or face-to-face CA process. Staff must explain exactly how the applicant was authenticated by providing comments detailing which system(s) were used to complete the CA and the outcome of the authentication. Please note: User login and case actions may be audited to ensure systems were accessed and used as documented in the case notes.

- **No:** Select “no” from the dropdown list when the applicant did not complete the CA process. Staff must explain why CA was not attempted or completed and document any pending information in the case notes.
- **N/A:** “N/A” should not be selected for FA or TCA or RAP.

FA, TCA & RAP Case Disposition

When an applicant opts out or fails the electronic CA process and does not complete the verbal or face-to-face CA process, the FA, TCA and RAP must be denied using the appropriate reason code: **360 – We did not receive proof of identity for you or a household member.**

Regional Program Offices with policy questions related to this transmittal should submit them through the Policy Technical Assistance Request form. For system-related questions, regional offices may contact Laquetta Anderson at Laquetta.Anderson@myflfamilies.com.

Attachments

Attachment 1: Customer Authentication System Alerts and Staff Actions

Attachment 2: Customer Authentication Question Bank

cc: Assistant Secretary for Economic Self Sufficiency (Bridget Royster)
Assistant Secretary for Office of Child and Family Well-Being (vacant)
Assistant Secretary for Office of Community Services (Patricia Medlock)
Assistant Secretary for Office of Substance Abuse and Mental Health (Erica Floyd Thomas)
Deputy Assistant Secretary for Operations (vacant)
Deputy Assistant Secretary for Programs (Jamie Dattoli)
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Florida Healthy Kids (Suzetta Furlong)

Attachment 1

Customer Authentication System Alerts & Staff Actions

SYSTEM ALERT	STAFF ACTIONS	ID VR CODE	CASE NOTES
ID Discovered and Authenticated	Identity of applicant is verified for all programs. Proceed with application processing.	TP	Automatic
DOB Verified but SSN and Full Name Mismatched and Authenticated OR ID Not Discovered and Authenticated	Check electronic sources to find misspelled names or transposed numbers in the SSN or DOB. <ul style="list-style-type: none"> If resolved, identity of applicant is verified for all programs. Proceed with application processing. If unresolved, contact the applicant to discuss discrepancies. If the applicant could not be reached, pend for verification of identity. 	TP	Automatic Document discrepancies in the case notes.
ID Discovered and Not Authenticated OR DOB Verified but SSN and Full Name Mismatched <u>and</u> Not Authenticated OR ID Not Discovered <u>and</u> Not Authenticated OR No system alerts displayed for Identity and/or Authentication	Stop and complete the verbal CA process.	Do not use TP Use appropriate verification code	Manual Document discrepancies and authentication in the case notes.
Deceased	Check electronic sources to find transposed numbers in the SSN or DOB: <ul style="list-style-type: none"> If a transposed number on the application caused the alert, ID is considered discovered. Complete the verbal CA process. If a transposed number on the application was not the issue, contact the applicant to discuss identity discrepancies and complete the verbal CA process. If the applicant fails the verbal CA process, they must be pended to visit their local Family Resource Center for face-to-face CA. If the applicant is verified as deceased, close or deny the benefits. All discrepancies must be resolved prior to authorizing ongoing benefits.	Do not use TP Use appropriate verification code	Manual Document discrepancies and authentication in the case notes.
Incarcerated	Verify the release date and resolve all discrepancies prior to authorizing benefits. <ul style="list-style-type: none"> If the release date is <u>verified</u> through the Department of Corrections website, staff will not have to complete the verbal CA process if the system alerts display ID Discovered and Authenticated. Document the case notes and proceed with application processing. If the release date is not verified on the Department of Corrections website, stop and complete the verbal CA process. If the applicant fails the verbal CA process, they must be pended to visit their local Family Resource Center for face-to-face CA. If the applicant is verified as incarcerated, close or deny the benefits. 	Do not use TP Use appropriate verification code	Manual Document discrepancies and authentication in the case notes.

Customer Authentication Question Bank

PRIMARY <i>(first)</i>	DAVID (Driver and Vehicle Information Database) https://david.flhsmv.gov/ Use DAVID as the primary electronic source for the verbal CA process.	In which state were you born? <i>(if not Florida)</i>
		In which country were you born? <i>(if born outside the US)</i>
		What was your previous vehicle?
		What was your previous name?
		What was your previous address?
		What is your alien registration number?
		What color is your vehicle?
		What vehicle is currently registered to you?
		How many vehicles are currently registered to you?
		Who is the co-owner of the vehicle?
		Who is the lien holder of the vehicle?
SECONDARY <i>(second)</i>	SAVE (Systematic Alien Verification for Entitlements) https://idp.uscis.gov/ Use SAVE for applicants with a non-citizen status when sufficient information from the primary electronic source is not available.	What is your alien registration number?
		In which country were you born?
		In which country was <i>(household member's name)</i> born?
		What is your date of entry?
		What is <i>(household member's name)</i> date of entry?
		When does your status expire?
		When does <i>(household member's name)</i> status expire?
		What year did you receive your USCIS status?
		What is the grant date of your current USCIS status?
		What is your sponsor's name? <i>(if applicant has a sponsor)</i>
		<i>Receiving Child Support</i>
		What is the name of the parent(s) paying child support?
		What is the amount of child support you receive?
		How often do you receive child support?
What was the amount of your last payment?		
<i>Paying Child Support</i>		
What is the name of the parent(s) receiving child support?		
What is the amount of child support you pay?		
What is the name of the child(ren) you support?		
How often do you pay child support?		
TERTIARY <i>(third)</i>	MNOV (Vital Statistics) Use MNOV for applicants who were born or whose children were born in Florida. Only use when information from the primary and/or secondary electronic sources are not available.	How many of your children were born in Florida?
		What are the names of your children born in Florida?
		What is the name of the hospital <i>(household member's name)</i> was born?
		What city was <i>(household member's name)</i> born?
		What county was <i>(household member's name)</i> born?
		What is <i>(household member's name)</i> middle name?
		What is <i>(household member's name)</i> date of birth?
		What was your marital status at the time <i>(household member's name)</i> was born?
		What address did you use when <i>(household member's name)</i> was born?
		What is the middle name of <i>(household member's name)</i> father?
		What is your maiden name?
		What is your mother's first and last name?
		What is your father's first and last name?
		What is your sibling's name? <i>(if born in Florida)</i>
		What is your mother's maiden name?
What state was either your mother or father born in?		
What is either your mother or father's birth date?		

Customer Authentication Question Bank

DES0 (SSA State On-line Query) Use DES0 for applicants who receive Social Security benefits or Supplemental Security Income (SSI). Only use when information from the primary and/or secondary electronic sources are not available.	How much do you receive each month in Social Security and/or SSI benefits?
	What is the name of the payee for your Social Security and/or SSI benefits?
	What is the payee's address?
	When is your disability begin date? <i>(if the individual is disabled)</i>
	What address did you provide to the SSA? <i>(if different from current address)</i>
	How much does your child <i>(name)</i> , receive each month in Social Security and/or SSI benefits?
	When is your child's disability begin date? <i>(if the individual is disabled)</i>
	How much does your spouse <i>(name)</i> receive each month in Social Security and/or SSI benefits?
	When is your spouse's disability begin date? <i>(if the individual is disabled)</i>
FLORIDA or ACCESS Worker Portal Use <u>historical information</u> from FLORIDA and/or the ACCESS Worker Portal when information from the primary and/or secondary electronic sources are not available.	What was your previous address?
	What was the name of your employer in <i>(year)</i> ?
	Where was <i>(household member's name)</i> employed at in <i>(year)</i> ?
	What school did <i>(household member's name)</i> previously attend?