

# SAVE<sup>TM</sup>

Sponsorship Guide

September 2020



U.S. Citizenship  
and Immigration  
Services

## TABLE OF CONTENTS

1.	INTRODUCTION.....	1
2.	BACKGROUND .....	1
2.1	Affidavit of Support Under Section 213A of the INA .....	1
2.2	Sponsor Deeming and Agency Reimbursement .....	1
2.2.1	Sponsor Deeming.....	1
2.2.2	Agency Reimbursement.....	1
2.2.3	Additional Information .....	2
2.3	Using SAVE to Obtain Sponsor Information.....	2
3.	SAVE SPONSORSHIP COMPLIANCE .....	3
3.1	Overview.....	3
3.2	When to Submit and Update Answers .....	3
3.3	Case Results Screen – Answer Sponsorship Compliance Questions .....	4
3.4	Case Results Screen – Update Answers .....	4
3.5	Sponsorship Compliance Questions .....	5
3.5.1	Benefit Eligibility and Deeming.....	5
3.5.2	Reimbursement Request Letter .....	5
3.5.3	Reimbursement Compliance.....	6
3.5.4	Reimbursement Collection Action .....	6
3.6	Select Continue or Go Back .....	6
3.7	Review and Submit Answers .....	7
3.8	Receive Confirmation of Submission .....	7
3.8.1	Case Result Page – Printer Friendly Version .....	8
3.8.2	Case Result Page – Sponsorship Compliance Summary.....	8

3.9 Close Case ..... 8

3.10 Sponsorship Compliance – More Than One Federal Means-Tested Public Benefit ..... 9

    3.10.1 Sponsorship Compliance Questions – Same Answers for All Federal Means-Tested Public Benefits..... 10

    3.10.2 Sponsorship Compliance Questions – Answer Questions Separately for Each Benefit..... 10

4. SUPPORT ..... 11

    4.1 Adapting Account and User Configurations and Permissions ..... 11

    4.2 Cases with Sponsor Information Received Through the HHS/CMS VLP Service ..... 11

    4.3 Web Services (System to System Interface) Access Method ..... 11

    4.4 Training ..... 12

    4.5 Other Questions and Support ..... 12

## 1. INTRODUCTION

This guide provides background and guidance regarding sponsorship compliance functionality that SAVE makes available to certain federal means-tested public benefit-granting agencies<sup>1</sup> to help them administer benefits and ensure compliance with federal laws, regulations, and policies regarding sponsor deeming and agency reimbursement.

## 2. BACKGROUND

### 2.1 Affidavit of Support Under Section 213A of the INA

Most family-based and some employment-based applicants for lawful permanent resident (LPR) status must submit Form I-864/Form I-864EZ, Affidavit of Support Under Section 213A of the INA, through which a sponsor agrees to make his or her income and assets available to support a sponsored immigrant. In some situations, a sponsored immigrant may have more than one sponsor, who each executes a Form I-864 and agrees to use their income and assets to support the sponsored immigrant. In addition, one or more of the sponsor's household members may sign Form I-864A, Contract Between Sponsor and Household Member, also in which the household members agree to make their income and assets available to support the sponsored immigrant. For more information about sponsors, please see the [USCIS Affidavit of Support webpage](#).

### 2.2 Sponsor Deeming and Agency Reimbursement

#### 2.2.1 Sponsor Deeming

Sponsored immigrants may be ineligible for certain federal or state means-tested public benefits because an agency will consider the income and assets of the sponsor (and the sponsor's household members, if applicable) when determining the immigrant's eligibility for these benefits. This process is called "deeming."

Federal means-tested public benefits include Medicaid, Children's Health Insurance Program, Temporary Assistance for Needy Families, Supplemental Nutrition Assistance Program, and Supplemental Security Income. This guide uses the terms "sponsor" and "sponsors" to refer to sponsors as well as household members who sign and submit Form I-864A, since sponsor deeming and agency reimbursement apply to both.

#### 2.2.2 Agency Reimbursement

If an agency provides a means-tested public benefit to a sponsored immigrant during the period the support obligation is in effect, then the agency or its lawful designee, if any (for example, a collection agency), may ask the sponsor to reimburse the agency for the cost of those means-tested public benefits. This request must be in writing, include an itemized statement supporting the claim for reimbursement, and be sent through personal service as defined by 8 CFR 103.8(a)(2). The most common type of personal service is mailing a copy by certified or registered mail (with a return receipt requested) to a person at their last known address. If a sponsor does not comply with the terms of the

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<sup>1</sup> As defined by 8 CFR 213a.1.

reimbursement request, then the agency can sue the sponsor and obtain a court order for reimbursement.

### 2.2.3 Additional Information

For more information regarding sponsor deeming and agency reimbursement, please see guidance for the following programs:

- [Medicaid and Children’s Health Insurance Program](#);
- [Temporary Assistance for Needy Families](#);
- [Supplemental Nutrition Assistance Program](#); and
- [Supplemental Security Income](#).

Your agency may also provide additional direction or guidance.

## 2.3 Using SAVE to Obtain Sponsor Information

As part of submitting an initial verification request to SAVE, your agency must indicate the public benefit or benefits for which it is submitting the verification request. If your agency submits the request for one or more federal means-tested public benefits and the benefit applicant is an LPR or conditional permanent resident who may be sponsored, then SAVE provides the name, address, and Social Security number of each sponsor and household member on record to use when performing sponsor deeming and agency reimbursement actions (Figure 1).

If there is no sponsor or household member on record, SAVE will provide a message saying “Not Applicable” in the Sponsors/Household Members field (Figure 2).

In some situations, the SAVE initial verification response may instruct your agency to institute additional verification if your agency needs sponsor information. For other situations where your agency seeks sponsor information for a benefit applicant who was an LPR but is not currently an LPR (for example, when determining retroactive eligibility), your agency must institute additional verification with a note in the Special Comments field specifically requesting sponsor information.

Sponsors/Household Members	
<b>Name</b>	<b>SSN</b>
Jane Doe	125-84-7896
<b>Address</b>	
123 Main Street	
Washington D.C., DC 99999	
USA - UNITED STATES	

Figure 1

Sponsors/Household Members
Not Applicable

Figure 2

## 3. SAVE SPONSORSHIP COMPLIANCE

### 3.1 Overview

In July 2020, SAVE implemented sponsorship compliance functionality to help agencies that administer federal means-tested benefits ensure more effective compliance with federal laws, regulations, and policies regarding financial sponsor deeming and agency reimbursement. This sponsorship compliance functionality stems from the May 23, 2019, [Presidential Memorandum on Enforcing the Legal Responsibilities of Sponsors of Aliens](#), which directs increased oversight and data collection to ensure more effective compliance with laws that apply when a financial sponsor completes Form I-864/I-864EZ, or when a sponsor's household member completes Form I-864A.

SAVE encourages agencies that administer federal means-tested public benefits to use the sponsorship compliance functionality to manage and report sponsor deeming and agency reimbursement decisions. However, each user should also consider any applicable direction or guidance outside of SAVE in deciding whether to use this functionality.

### 3.2 When to Submit and Update Answers

The sponsorship screens consist of four short questions. The first question asks about benefit eligibility and deeming. The second, third, and fourth questions ask about reimbursement.

SAVE knows that your agency may not have the answers to these questions when it receives the sponsor information in the SAVE response to your verification request. It is also possible that the answers to some questions may change (for example, a sponsor may be in compliance with an installment payment plan for reimbursement and then later fall out of compliance by missing a payment). Therefore, the sponsorship screens allow your agency to submit the answers it has at a particular time and then return later to update the answers.

Your agency may find it more efficient to submit and update answers on a periodic basis rather than as each action occurs for each case. If so, SAVE asks your agency to ensure sponsorship answers are current on the first federal government business day of the month. Your agency may submit and update their answers more frequently. However, if it does not, the minimum monthly cycle provides consolidated data with a common frequency that ensures that the data will not lose accuracy and relevance due to aging.

### 3.3 Case Results Screen – Answer Sponsorship Compliance Questions

If the SAVE response includes sponsor or household member information, then the screen will also include an Answer Sponsorship Compliance Questions button that your agency can select to answer the sponsor deeming and agency reimbursement questions. If the SAVE response is to an initial verification request (rather than an additional verification request), then it will also include a link to Institute Additional Verification (Figure 3).

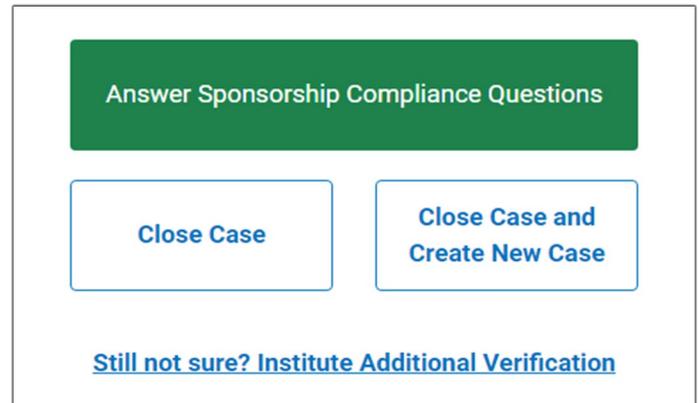


Figure 3

### 3.4 Case Results Screen – Update Answers

If your agency has previously submitted one or more answers to the sponsorship compliance questions, then the submitted information will appear in the SAVE Case Result screen along with an Update Answers button. To update answers, select the Update Answers button. This will bring up the Sponsorship Compliance Questions screen, where your agency can update your agency's answers to those questions (Figure 4).

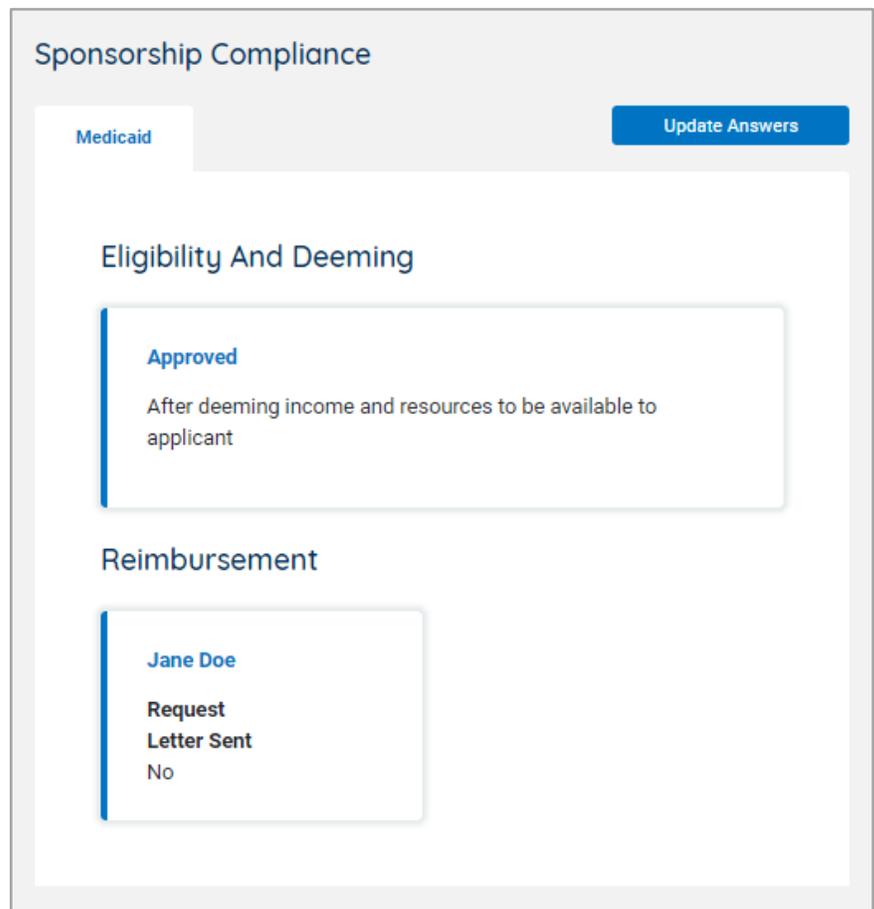


Figure 4

### 3.5 Sponsorship Compliance Questions

The answer to each sponsorship compliance question, except for the last one, will determine whether your agency will need to answer the next question.

#### 3.5.1 Benefit Eligibility and Deeming

If your agency selects the Answer Sponsorship Compliance Questions button on the SAVE Case Results screen, then the Sponsorship Compliance Questionnaire will begin with a Benefit Eligibility and Deeming Question (Figure 5). Your agency must answer this question after it has approved or denied the benefit application.

If your agency selects “Without deeming income and resources to be available to applicant because of another reason,” it must provide a brief description that includes a legal citation.

For example, say “CHIPRA 214 option” if an immigrant is not subject to sponsor deeming requirements due to falling under this option as described in the [Medicaid and Children’s Health Insurance Program](#) guidance issued by the Department of Health and Human Services, Centers for Medicare and Medicaid Services.

#### 3.5.2 Reimbursement Request Letter

If your agency selects a Benefit Eligibility and Deeming answer saying it approved the application for the benefit, then SAVE will present a second question listing each sponsor and asking which sponsor(s), if any, your agency sent a reimbursement request letter to (Figure 6).

**Benefit Eligibility And Deeming** ⓘ

How did your agency determine the applicant’s eligibility for Medicaid?

My agency *approved* the application for Medicaid...

- After deeming income and resources to be available to applicant
- After deeming any amount provided to applicant since they were determined to be indigent per 8 U.S.C. 1631(e)
- Without deeming income and resources to be available to applicant because applicant has earned (or was credited with) 40 qualifying quarters of coverage under Title II of the Social Security Act
- Without deeming income and resources to be available to applicant because applicant or their child meets the requirements of a battered spouse or child per 8 U.S.C. 1631(f)
- Without deeming income and resources to be available to applicant because of another reason

My agency *denied* the application for Medicaid...

- Because deeming income and resources to be available to applicant made them ineligible
- Because applicant's immigration status made them ineligible
- Because of another reason

Figure 5

**Reimbursement Request Letter** ⓘ

Please select anyone who your agency has sent a reimbursement request letter to via personal service for Medicaid.

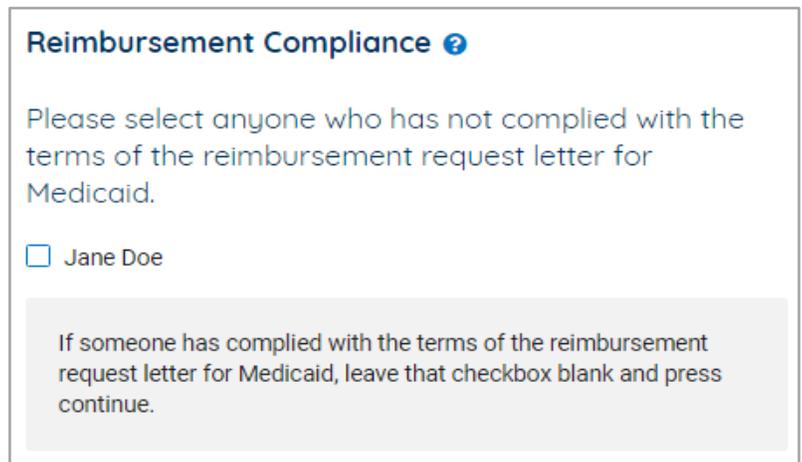
Jane Doe

If your agency has decided not to seek reimbursement from someone for Medicaid (or has not made that decision yet), leave that checkbox blank and press continue.

Figure 6

### 3.5.3 Reimbursement Compliance

If your agency indicated that it sent one or more reimbursement request letters, then SAVE will present a third question listing each sponsor to whom your agency said it sent a reimbursement request letter and asking which, if any, of these sponsor(s) have not complied with the terms of the reimbursement request letter (Figure 7).



**Reimbursement Compliance** ?

Please select anyone who has not complied with the terms of the reimbursement request letter for Medicaid.

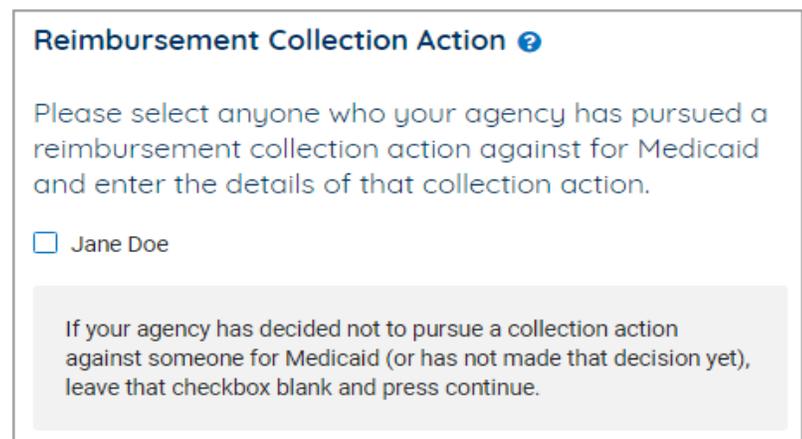
Jane Doe

If someone has complied with the terms of the reimbursement request letter for Medicaid, leave that checkbox blank and press continue.

Figure 7

### 3.5.4 Reimbursement Collection Action

If your agency indicated that one or more of the sponsors have not complied with the terms of the reimbursement request letter, SAVE will present a fourth question asking whether your agency has pursued a reimbursement collection action regarding the sponsor(s) who have not complied, and some details of any such action (Figure 8).



**Reimbursement Collection Action** ?

Please select anyone who your agency has pursued a reimbursement collection action against for Medicaid and enter the details of that collection action.

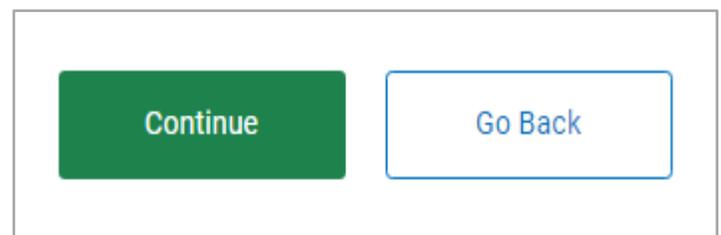
Jane Doe

If your agency has decided not to pursue a collection action against someone for Medicaid (or has not made that decision yet), leave that checkbox blank and press continue.

Figure 8

### 3.6 Select Continue or Go Back

After providing up-to-date answers, select the Continue button to proceed to the Review and Submit Answers screen (Figure 9). If you need to go back to the Case Result screen, select the Go Back button. This will delete any answers and updates you have not already submitted.



Continue

Go Back

Figure 9

### 3.7 Review and Submit Answers

Review the answers for accuracy, then submit them by selecting the Submit Answers button. The Go Back button will return you to the Sponsorship Compliance Questions screen (Figure 10).

**Review Answers**

Please check to make sure your answers are accurate before submitting them.

**Medicaid**

**Eligibility And Deeming**

**Approved**  
After deeming income and resources to be available to applicant

**Reimbursement**

**Jane Doe**  
**Request Letter Sent**  
No

**Submit Answers** **Go Back**

Figure 10

### 3.8 Receive Confirmation of Submission

Selecting the Submit Answers button will return you to the Case Result screen. A green notification will appear in the upper right part of the screen confirming the submission (Figure 11).

Official Website of the Department of Homeland Security

**SAVE** Home Initiate Case Search Cases Profile Reports Help

**Case Result** Case Status: Status Returned

Answers for Case 0020167154553XP submitted.

**SAVE Response**

**Applicant Status:** Conditional Resident - Employment Authorized

Applicant is a non-national of the U.S. who has been granted permanent resident status on a conditional basis. They are allowed to live and work in the United States as a permanent resident, but they will need to apply to remove the conditions of their status within two years of issuance of their permanent resident status. See the Guide to Understanding SAVE Verification Responses for additional information. You will need to follow your agency's policy when determining whether this applicant is eligible for benefits.

Case Creation  
Photo Match  
Additional Verification

Figure 11

### 3.8.1 Case Result Page – Printer Friendly Version

Selecting the Print button on the upper right part of the Case Result page will generate a printer-friendly version of the Case Results page (Figure 12).



Figure 12

### 3.8.2 Case Result Page – Sponsorship Compliance Summary

The answers that you and any others have submitted for your agency will appear at the bottom part of the Case Results page (refer back to Figure 4).

### 3.9 Close Case

To close the case, select the Close Case button or the Close Case and Create New Case button (Figure 13). Closing the case indicates that the answers your agency provided are final and will not change.



Figure 13

Due to the finality of closing the case, SAVE also asks you to confirm that you want to close the case before doing so (Figure 14).

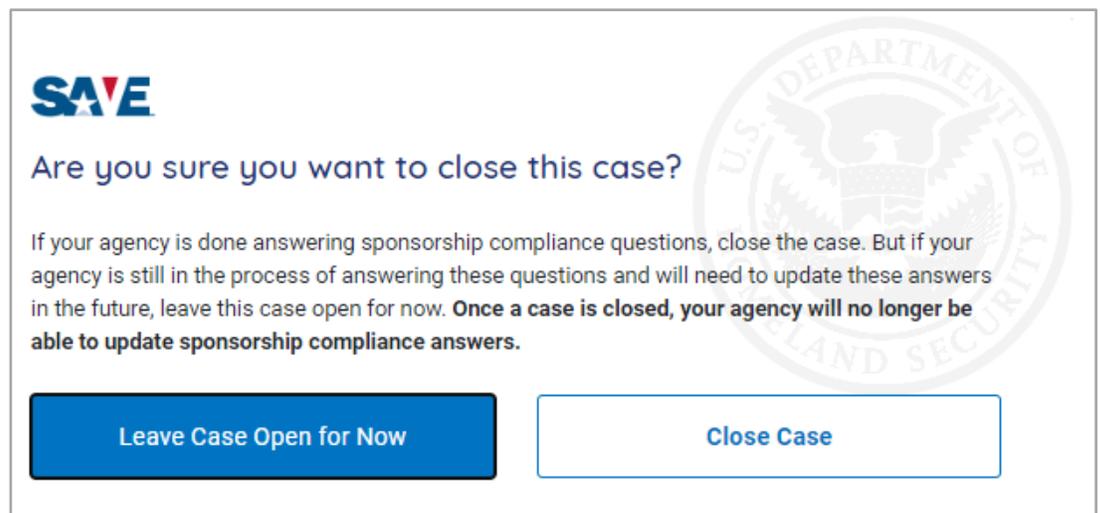


Figure 14

### 3.10 Sponsorship Compliance – More Than One Federal Means-Tested Public Benefit

If your agency submitted its immigration status verification request for more than one federal means-tested public benefit and chooses to answer the sponsorship questions, then SAVE will provide a tab at the top of the screen for each federal means-tested public benefit (Figure 15).

Medicaid SNAP TANF

#### Benefit Eligibility And Deeming [?](#)

How did your agency determine the applicant's eligibility for Medicaid?

My agency *approved* the application for Medicaid...

- After deeming income and resources to be available to applicant
- After deeming any amount provided to applicant since they were determined to be indigent per 8 U.S.C. 1631(e)
- Without deeming income and resources to be available to applicant because applicant has earned (or was credited with) 40 qualifying quarters of coverage under Title II of the Social Security Act
- Without deeming income and resources to be available to applicant because applicant or their child meets the requirements of a battered spouse or child per 8 U.S.C. 1631(f)
- Without deeming income and resources to be available to applicant because of another reason

My agency *denied* the application for Medicaid...

- Because deeming income and resources to be available to applicant made them ineligible
- Because applicant's immigration status made them ineligible
- Because of another reason

Figure 15

The answers for each federal means-tested public benefit will often be the same, so SAVE allows your agency to designate a single set of answers for all benefits, rather than requiring it to re-key the same answers for each benefit. After your agency provides its answers for the first federal means-tested public benefit and selects Continue, SAVE will ask you whether your agency wants to use the answers from the first benefit tab for all of the other federal means-tested public benefits for which the agency submitted the immigration status verification request (Figure 16).

**SAVE**

#### Would you like to use these answers for all benefits?

If the answers you entered for this benefit are the same for all means-tested benefits included in this SAVE case, you can save time by using these answers for all benefits. But if any of these answers are different (for example, your agency approved some benefits but denied others, your agency sent reimbursement request letters for some benefits but not all benefits, etc.), you must answer questions separately for each means-tested benefit.

**Use These Answers for all Benefits**

Answer Questions Separately for Each Benefit

Figure 16

### 3.10.1 Sponsorship Compliance Questions – Same Answers for All Federal Means-Tested Public Benefits

If your agency selects Use These Answers for all Benefits, then SAVE will display them on a single tab (Figure 17).

**Review Answers**  
Please check to make sure your answers are accurate before submitting them.

**Medicaid, SNAP and TANF**

**Eligibility And Deeming**

**Approved**  
After deeming income and resources to be available to applicant

**Reimbursement**

<b>Lisa Brown</b> Request Letter Sent No	<b>Jane Doe</b> Request Letter Sent No	<b>Jack Miller</b> Request Letter Sent No
--	--	---

Figure 17

### 3.10.2 Sponsorship Compliance Questions – Answer Questions Separately for Each Benefit

If your agency selects Answer Questions Separately for Each Benefit, then it can use the tabs to view and answer the sponsorship questions separately for each benefit (Figure 18).

**Review Answers**  
Please check to make sure your answers are accurate before submitting them.

**Medicaid** | **SNAP** | **TANF**

**Eligibility And Deeming**

**Approved**  
After deeming any amount provided to applicant since they were determined to be indigent per 8 U.S.C. 1631(e)

**Reimbursement**

<b>Lisa Brown</b> Request Letter Sent No	<b>Jane Doe</b> Request Letter Sent No	<b>Jack Miller</b> Request Letter Sent No
--	--	---

Figure 18

## 4. SUPPORT

SAVE is committed to providing outstanding support to user agencies. This section describes the support that SAVE offers.

### 4.1 Adapting Account and User Configurations and Permissions

SAVE knows that the agency personnel who submit and process SAVE immigration status verification requests may be different from those who have the answers to the sponsorship questions. SAVE stands ready to help your agency adapt its account to facilitate answering the sponsorship questions. To get help doing this, please send an email to [save.help@uscis.dhs.gov](mailto:save.help@uscis.dhs.gov) with the subject line “SAVE Sponsorship Initiative – Account and User Configuration.”

### 4.2 Cases with Sponsor Information Received Through the HHS/CMS VLP Service

Some state health care agencies submit immigration status requests to and receive responses from SAVE through the Health and Human Services, Centers for Medicare and Medicaid, Federal Data Services Hub Verify Lawful Presence service (HHS/CMS VLP service). Responses through the VLP service sometimes include sponsor information. However, the sponsorship questions and answers will not be available through the VLP service. Therefore, for cases in which a state health care agency has received sponsor information from SAVE through the VLP service, SAVE will provide a way to answer the sponsorship questions through your agency’s separate SAVE account for its direct connection to us.

If your agency does not already have a separate account for connecting directly to SAVE, SAVE will create one for that agency. This will include your agency signing a Memorandum of Agreement with SAVE if it does not already have one. If your agency would like to pursue this arrangement, please email [save.help@uscis.dhs.gov](mailto:save.help@uscis.dhs.gov) with a subject line “SAVE Sponsorship Initiative – HHS/CMS VLP Service Cases.”

### 4.3 Web Services (System to System Interface) Access Method

Your agency may access SAVE through a web services (system to system) connection. Agencies that access SAVE in this way avoid data entry and gain other efficiencies by having their information systems connect to SAVE. The technical specifications for web services are in the SAVE Interface Connection Agreement (ICA).

SAVE offers federal means-tested public benefit-granting agencies the ability to answer the sponsorship questions through a web services connection. The technical specifications are in a Sponsorship Addendum to the SAVE ICA. In addition, SAVE invites these agencies to discuss additional technical ideas for participating in the SAVE sponsorship initiative. SAVE encourages agencies that will implement the SAVE Sponsorship ICA addendum to do so by January 15, 2021. To obtain a copy of the SAVE Sponsorship ICA Addendum and discuss additional technical ideas, please email [save.help@uscis.dhs.gov](mailto:save.help@uscis.dhs.gov) with a subject line “SAVE Sponsorship Initiative – ICA Addendum.”

## 4.4 Training

SAVE provides webinars and other sponsorship compliance training to agencies using the Sponsorship Compliance functionality. To request training, send an email to [save.help@uscis.dhs.gov](mailto:save.help@uscis.dhs.gov) with a subject line “TRAINING REQUEST – SAVE Sponsorship Initiative.” Please include your agency’s name and the email address and telephone number of your agency’s point of contact for the training.

## 4.5 Other Questions and Support

For other questions and support regarding the SAVE Sponsorship Initiative, please contact SAVE by:

- Email at [save.help@uscis.dhs.gov](mailto:save.help@uscis.dhs.gov). Please include “SAVE Sponsorship Initiative” in the subject line of the email.
- Phone at 877-469-2563 from 7 a.m. to 5 p.m. Central, Monday through Friday. Please indicate that you are calling about the SAVE Sponsorship Initiative.