



MAR 02 2010

United States
Department of
Agriculture

Food and
Nutrition
Service

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Alexandria, VA
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SUBJECT: Supplemental Nutrition Assistance Program (SNAP) – Summary of Certification Interview Policy Relevant to Community Partner Interviewer Demonstration Projects

TO: All Regional Directors
Supplemental Nutrition Assistance Program

The Food and Nutrition Service has developed the enclosed table, the Summary of Certification Interview Policy, to highlight certification interview policy and help State agencies convey the interview provisions to community-based organizations (CBOs) that participate in Community Partner Interviewer Demonstration Projects. This table may also be useful to State agencies that are considering requesting Community Partner Interviewer Demonstration Projects and their community partners.

When CBOs are approved to conduct the interview, they take on more responsibility for proper implementation of regulations. In this capacity, CBOs are providing more than application assistance and become representatives of the State agency. It is the responsibility of the State and the CBO to work together to ensure that SNAP policy and procedures are properly implemented and that client rights are protected. The enclosed Summary of Certification Interview Policy table highlights pertinent interview policy provisions within the SNAP regulations.

As dictated by the full terms and conditions of the Community Partner Interviewer Demonstration Project, the State must ensure that the community partner personnel comply with all application processing standards as they apply to SNAP under the Food and Nutrition Act of 2008, Title 7 Code of Federal Regulations Part 273, and relevant State codes. State agencies must abide by the terms and conditions of Community Partner Interviewer Demonstration Projects and ensure that CBOs uphold all SNAP policies.

State agencies that have questions regarding this guidance should contact their respective Regional Office representative. Regional Office staff persons who have questions regarding this guidance should contact Moira Johnston at (703) 305-2515 or Angela Kline at (703) 305-2495.


Arthur T. Foley

Director
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Enclosures

Cc: Moira Johnston
Angela Kline

Summary of Certification Interview Policy

This table is intended to highlight pertinent interview policy provisions within the SNAP regulations. Community-based organizations (CBOs) should refer to the full provisions for more information and to help ensure compliance. State agencies should work with CBOs to ensure that terms and conditions of Community Partner Interviewer Demonstration Projects are followed and that all SNAP policies are upheld.

Provisions	Details	Citation	Comments on Compliance
1	Procedures to serve households with special needs The agency must establish procedures and operations to best serve households in the State, including households with special needs, such as the elderly or disabled, households in rural areas, non-English speakers and the homeless.	7 CFR 273.2(a)(1)	These provisions are overarching requirements that apply to State agencies and should be reflected in CBO procedures. For those households with special needs that a CBO is not able to serve, the CBO should have procedures in place to smoothly and swiftly transfer the applicant household's request to the State agency. This provision should be incorporated into CBO training of staff, procedures, and implementation.
2	Timely, accurate, and fair service The agency must provide timely, accurate and fair service.	7 CFR 273.2(a)(1)	These provisions are overarching requirements that apply to State agencies and should be reflected in CBO procedures. This provision should be incorporated into CBO training of staff, procedures, and implementation.
3	Availability of expedited service The agency must make expedited service available to households in immediate need.	7 CFR 273.2(a)(2)	The CBO must have a procedure in place to screen for households that may be eligible for expedited service and to swiftly and to smoothly transfer these applicant households to the State agency. This provision should be incorporated into CBO training of staff, procedures, and implementation.
4	Notify applicants that they may file a separate application just for SNAP If a State has a procedure that allows applicants to apply for SNAP and other programs at the same time, the agency shall notify applicants that they may file an application for SNAP benefits separately from any other application.	7 CFR 273.2(b)(3)	This provision is not applicable to CBOs that only handle SNAP applications. If the CBO processes applications for other assistance programs, this provision should be incorporated into CBO training of staff, procedures and implementation.
5	Signs to explain the right to file The agency shall post signs in the certification office which explain the application processing standards and the right to file an application on the day of initial contact.	7 CFR 273.2(b)(4)	The CBO must post signs to be in compliance with this provision. The CBO should also incorporate provisions pertaining to the right to file into CBO training of staff, procedures and implementation.
6	Privacy Act statement The agency must notify all households applying that the collection of information is authorized under the Food and Nutrition Act and that the information collected will be used to determine eligibility and monitor compliance with program regulations and may be disclosed to other State and Federal agencies. Households must also be notified that providing information, including Social Security Numbers (SSNs) for household members, is voluntary. However, failure to provide an SSN for an individual will result in the denial of SNAP benefits to that individual.	7 CFR 273.2(b)(4)	While privacy act information is included on the application, the CBO should encourage its staff to verbally review this information with the applicant. This provision should be incorporated into CBO training of staff, procedures and implementation.

7 Household's right to file	The agency must document the date the application was filed by recording the date of receipt. Households have the right to file an application form on the same day it contacts the SNAP office, the right to review the information that has been recorded electronically and the right to receive a copy of that information. The household has the right to file an incomplete application, as long as the form contains the applicant's name, address and signature and the right to file an application without being interviewed.	7 CFR 273.2(c)(1)	The CBO must document the filing date so that it may be transferred to the State agency; this practice helps to ensure that the applicant household is certified for the full benefit for which it is entitled. This provision should be incorporated into CBO training of staff, procedures and implementation.
8 Notice of required verification	The agency shall provide the household with a description of the verification requirements that the household must meet, including examples of the types of documents, and of the agency's responsibility to help the household in obtaining verification.	7 CFR 273.2(c)(5)	The CBO must understand State policy on what items must be verified and what documents are acceptable. The CBO must inform the household of these verifications and should advise the household of its responsibilities, including when and what to provide. The CBO has the responsibility to help the household in obtaining verification. This provision should be incorporated into CBO training of staff, procedures and implementation.
9 Location of interviews	Interviews may be conducted at the office or other mutually acceptable location, including a household's residence, as long as the interview is scheduled in advance with the household.	7 CFR 273.2(e)(1)	The CBO must make it clear that it is the applicant's choice to apply at a CBO and that applicant may apply the local office instead. This provision should be incorporated into CBO training of staff, procedures and implementation.
10 Who may be interviewed	The individual interviewed may be the head of household, his or her spouse, or any other responsible member of the household, or an authorized representative.	7 CFR 273.2(e)(1)	Only one representative from the household needs to be interviewed. This provision should be incorporated into CBO training of staff, procedures and implementation.
11 Interviewee may bring a companion	The applicant may bring any person he or she chooses to the interview.	7 CFR 273.2(e)(1)	This provision should be incorporated into CBO training of staff, procedures and implementation.
12 Explore and resolve unclear information	The interviewer must not simply review the information in the application, but must explore and resolve unclear and incomplete information with the household.	7 CFR 273.2(e)(1)	It is of critical importance that the CBO explore and resolve any unclear information with the household. The goal of the interview is to make the best effort to finalize clear and complete application information so that the State can make a determination of eligibility and benefit level. This provision should be incorporated into CBO training of staff, procedures and implementation.
13 Advise of rights and responsibilities	The interviewer must advise the household of the household's rights and responsibilities during the interview, including the appropriate application processing standard and the household's responsibility to report changes.	7 CFR 273.2(e)(1)	The CBO staff must understand the reporting requirements for different kinds of households under State policy. This provision should be incorporated into CBO training of staff, procedures and implementation.
14 Advise of distinction between SNAP and PA benefits	The interviewer must advise households that are also applying for PA benefits that time limits and other requirements of PA benefits do not apply to SNAP and that if a household's PA benefits are terminated, the household may still be eligible for SNAP.	7 CFR 273.2(e)(1)	FNS is not aware of any waivers that involve multiple program applications accepted by CBOs. Should this provision apply, it should be incorporated into CBO training of staff, procedures and implementation.

15 Official and confidential nature of the interview The interviewer must conduct the interview as an official and confidential discussion of household circumstances. The agency must protect the applicant's right to privacy during the interview.

7 CFR 273.2(e)(1)

CBO staff must understand that they must not discuss client circumstances outside of official business and must keep client documents in a secure manner that protects client privacy. This provision should be incorporated into CBO training of staff, procedures and implementation.

16 Adequate facilities to preserve privacy and confidentiality The agency must provide facilities adequate to preserve the privacy and confidentiality of the interview.

7 CFR 273.2(e)(1)

CBOs should carefully evaluate facilities and take steps to ensure that household privacy and confidentiality are preserved. This provision should be incorporated into CBO training of staff, procedures and implementation as well.

17 Advise of the option for telephone interviews because of household hardship The agency must notify the applicant that it will waive the face-to-face interview in favor of a telephone interview on a case-by-case basis because of household hardship situations as determined by the State agency.

7 CFR 273.2(e)(2)

The CBO must make sure that the household is aware of the availability of telephone interviews and the CBO should have procedures in place to smoothly and swiftly transfer applicant households to the State agency if the household would like a telephone interview and the CBO does not provide them. This provision should be incorporated into CBO training of staff, procedures and implementation.

18 Scheduling interviews The agency must schedule an interview for all applicant households who are not interviewed on the day they submit their applications and, to the extent possible, schedule the interview to accommodate the needs of groups with special circumstances and schedule the interview as promptly as possible.

7 CFR 273.2(e)(3)

If the CBO cannot provide same day interviews, the CBO must have procedures in place to schedule interviews or to put the applicant in touch with the State agency for interview scheduling. This provision should be incorporated into CBO training of staff, procedures and implementation.

19 Notice of missed interview (NOMI) The agency must notify each household that misses its interview that the household is responsible for rescheduling a missed interview.

7 CFR 273.2(e)(3)

CBOs must swiftly give information on missed interviews to State agencies so that State agencies may issue the Notice of Missed Interview (NOMI) promptly. If a household misses its interview, the household will not receive benefits and the purpose of the NOMI is to notify the household that the interview has been missed. This provision should be incorporated into CBO training of staff, procedures and implementation.

20 Verification timeline The agency must give households at least 10 days to provide required documents or contact with a third party to confirm the accuracy of statements or information.

7 CFR 273.2(f)

If the CBO is assigning verification, then the State agency must have a procedure in place to document the date that the client receives the list of assigned verifications. If the CBO is collecting the verification, then the CBO must have procedures in place to file the verification and document the dates verification is received. The CBO must also have a procedure in place to swiftly transfer the date the verification was assigned, the date verification was received, and the verification itself to the State agency. This provision should be incorporated into CBO training of staff, procedures and implementation.

<p>21 Deductions and mandatory verification</p> <p>The agency shall verify the following information prior to certification for households initially applying: gross nonexempt income, alien eligibility, utility expenses, medical expenses, social security numbers, residency, identity, disability, household composition, student exemption information, child support, and ABAWD verifications. (See full provisions.)</p>	<p>7 CFR 273.2(f)(1)</p>	<p>In addition to documenting deductions (income and deductions are detailed in 7 CFR 273.9), the CBO must collect verification documents and information and promptly transfer to the State agency. CBO staff should understand household deductions and mandatory verification and be aware that it is in the client's interest to document all household costs and provide all verification, in order to ensure that the household gets the full benefit for which it is eligible. The CBO must help the house to obtain necessary verification. This provision -- as well as rules on deductions, assigned verifications and acceptable forms of verification -- should be incorporated into CBO training of staff, procedures and implementation.</p>
<p>22 Normal processing standard</p> <p>The agency shall provide eligible households that complete the initial application process the opportunity to participate as soon as possible, but no later than 30 calendar days following the date the application was filed.</p>	<p>7 CFR 273.2(g)</p>	<p>The CBO must transfer all information collected from the household to the State agency as soon as possible to allow the State agency to complete the application process. This provision should be incorporated into CBO training of staff, procedures and implementation.</p>
<p>23 Households entitled to expedited service</p> <p>The following households are entitled to expedited service: households with less than \$150 in monthly gross income and less than \$100 in liquid resources, migrant or seasonal farmworkers who are destitute and have less than \$100 in liquid resources, and/or households whose combined monthly gross income and liquid resources are less than the household's monthly rent/mortgage and utilities.</p>	<p>7 CFR 273.2(i)(1)</p>	<p>This provision should be incorporated into CBO training of staff, procedures and implementation.</p>
<p>24 Expedited service screening</p> <p>The agency's application procedures shall identify households eligible for expedited service at the time the household requests assistance. For example, a receptionist, volunteer, or other employee shall be responsible for screening applications as they are filed or as individuals come in to apply.</p>	<p>7 CFR 273.2(i)(2)</p>	<p>CBOs must have a process in place to swiftly identify households that may be eligible for expedited service and transfer these households' requests for assistance to the State agency as soon as possible. This provision should be incorporated into CBO training of staff, procedures and implementation.</p>
<p>25 Expedited service processing timeline</p> <p>The agency shall make a benefits card available to expedited service entitled households no later than the seventh calendar day following the date an application was filed.</p>	<p>7 CFR 273.2(i)(3)(i)</p>	<p>CBOs must have a process in place to transfer such households' requests for assistance to the State agency as soon as possible. This provision should be incorporated into CBO training of staff, procedures and implementation.</p>

<p>26 Special procedures for expediting service</p>	<p>In order to expedite the certification process, the agency shall verify the applicant's identity through a collateral contact or readily available documentary evidence and make all reasonable efforts to complete other verifications within the expedited standard. However, benefits shall not be delayed beyond the delivery standard of seven days solely because these eligibility factors have not been verified. For expedited households, the State may postpone verification.</p>	<p>7 CFR 273.2(i)(4)</p>	<p>If the CBO is processing expedited service eligible households, the CBO must follow all special procedures for expedited service households, including making reasonable efforts to complete verifications, but not delaying benefits solely because these eligibility factors have not been verified, pursuant to 7 CFR 273.2(i)(3). This provision should be incorporated into CBO training of staff, procedures and implementation.</p>
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<p>27 Authorized representatives</p>	<p>The agency shall inform applicants and prospective applicants that indicate that they may have difficulty completing the application process that they may designate a non-household member as the authorized representative and that the household may be liable for any over issuance that results from erroneous information given by the authorized representative. The household should be encouraged to also name an authorized representative for obtaining benefits in case of illness or other circumstances which might result in an inability to obtain benefits.</p>	<p>7 CFR 273.2(i)(4)</p>	<p>This provision should be incorporated into CBO training of staff, procedures and implementation.</p>
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<p>28 Civil Rights Compliance</p>	<p>In the certification of applicant households for the supplemental nutrition assistance program, there shall be no discrimination by reason of race, sex, religious creed, national origin, or political affiliation.</p>	<p>Food and Nutrition Act of 2008, Section 11(c)</p>	<p>The CBO's administration of the project must be consistent with the rights of households as prescribed by the provisions on civil rights compliance in the Food and Nutrition Act as well as other legislative authority. This provision should be incorporated into CBO training of staff, procedures and implementation.</p>
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