

August 24, 2007

SUBJECT: Face-to-Face Interview Waiver Criteria

TO: All Regional Directors
Food Stamp Program

This is to advise you that we are modifying our criteria for the approval of waivers of the face-to-face interview at both initial and recertification. (Technically these are waivers of the requirement to document individual hardship in the case file; regardless of whether a State has a waiver from FNS, applicants who would experience hardship to attend an interview in the office are entitled to telephone interviews or home interviews on an individual basis).

Under our previous guidance, issued through a memorandum dated October 6, 2006, we advised the regional offices that in order to receive a waiver of the face-to-face interview requirement, we required that the State agency not be in the first year of liability status. Based on our review of quality control data for States with waivers of the face-to-face interview requirement, we do not find a correlation between the interview waivers and the State's overall payment error rate, and are no longer conditioning approval of such waivers on payment error rates or liability status. If a State is in liability status, there is a clear need to improve payment accuracy but forcing a return to face-to-face interviews could potentially impede this effort. There are many factors that may cause payment errors. FNS will work with State agencies with payment accuracy problems and if telephone interviews are identified as a cause of these problems waivers may not be renewed.

As indicated in our previous guidance, all waivers of the face-to-face interview will continue to be subject to the following conditions:

- The State must agree to an evaluation of the waiver;
- The State must be able to identify waiver cases in connection with the Quality Control review process;
- For initial waivers of the face-to-face interview at initial application, the waiver of the requirement to document hardship status is limited to no more than 50 percent of the caseload, selected at the discretion of the State agency. Waivers of the face-to-face interview requirement at recertification would continue to be approvable on a Statewide basis;
- The State agency must grant a face-to-face interview if the household or its authorized representative asks for one;
- After one year, the State agency must provide an interim report, including payment error rate data on households affected by the waiver, to determine if the waiver has caused any adverse impact; and

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- QC payment accuracy data on (1) recertified cases under the waiver, (2) initial applications under the waiver, and (3) initial applications approved with a face to face interview. However, the State must be able to code whether a case reviewed in QC was last interviewed face-to-face or by telephone.

If you have any questions, please contact Larry Tropp of my staff by email or by telephone at (703) 305-2504.

/s/

Arthur T. Foley
Director
Program Development Division

FNS:FSP:PDD:CPB:TO'CONNELL:305-2390:FINAL:08/24/07:va
DIR: I:CPB:Waivers:Memorandums:All regions memo on criteria for face-to-face interview waivers (AUG 2007 Revision)