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United States
Department of
Agriculture

Food and
Nutrition
Service

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Alexandria, VA
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SUBJECT: SNAP – Changes in FNS Approval of Waivers of the Face-to-Face Interview Requirement Without the Need to Document Hardship

TO: Regional Directors
Supplemental Nutrition Assistance Program (SNAP)
All Regions

Currently, nearly half of all State agencies are operating under an FNS-approved waiver that permits case workers to conduct telephone interviews in lieu of the face-to-face interviews at initial certification and/or recertification as required by the SNAP regulations at 7 CFR 273.2(e)(1) and 273.14(b)(3). This waiver permits State agencies to forego case file documentation that is required when the face-to-face interview is waived for an individual household due a hardship. To date, FNS has normally approved waivers of the face-to-face interview for two years and required State agencies to identify whether a case reviewed in Quality Control (QC) was interviewed face-to-face or via telephone. To extend the waiver beyond the initial two-year period, FNS has required that State agencies submit data that demonstrates that the waiver has not adversely affected households and has not resulted in higher QC error rates for households processed under this waiver. Over the years, State agencies adopted telephone interviews for a growing number of cases and have consistently reported that both households and agency staff have benefited from the use of the waiver.

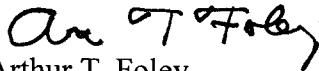
In recognition of these positive results, FNS will extend the approval period for waivers of the face-to-face interview without the need to document hardship. Effective immediately, all new approvals will be granted for four years. In addition, State agencies will no longer be required to code the type of interview for QC purposes and to report on error rates based on interview type, although the State agency must be able to report annually on the percent of the total caseload that was certified under the waiver. State agencies must continue to adhere to all other regulatory provisions for conducting interviews as described in 7 CFR 273.2(e) and 7 CFR 273.14(b). As a condition of the waiver, the State agency must also agree to the following:

- State agencies must conduct a face-to-face interview if determined to be appropriate;
- State agencies must provide a face-to-face interview if requested by the applicant or participant;
- A Notice of Missed Interview (NOMI) must be provided to the client if the telephone interview is missed as required in 7 CFR 273.2(e)(3); and
- The quality of the application process must not be negatively affected – the same information should be requested during the interview and the same verification processes should be employed regardless of the type of interview provided..

Regional Directors
Page 2

FNS may choose to limit the approval period for any waiver that does not comport with these standard features and may provide a shorter approval period if FNS receives information that households or program administration are being adversely affected as a result of the waiver.

If you have any questions about this memorandum, please contact Sandra Clark, Chief, Certification Policy Branch via email at sandy.clark@fns.usda.gov or at 703-305-2495.



Arthur T. Foley
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