

## CURRENT FACE-TO-FACE INTERVIEW POLICY

### The Rules

The regulations at 7 CFR 273.2(e)(1) generally require a face-to-face interview at initial application and at least once every 12 months thereafter. The regulations also note some exceptions.

For any interim redeterminations during the 12-month period, it is up to the State agency to determine whether there will be an face-to-face interview, a telephone interview, or no interview at all.

The regulations give the State agency the authority to waive (dispense with) any required face-to-face interview and substitute a telephone interview for households in which all members have no earnings and are elderly or disabled. The State agency also has the authority to waive any required face-to-face interview and substitute a telephone interview for households who evidence a State-defined hardship situation and the State agency documents the case file.

These criteria could be something as broadly defined as “all households with earned income”, “all households with minor children”, or “all households where all adults are elderly or disabled.” The documentation could be as simple as a check-off in the State’s data system.

Under previous guidance, in order to receive a waiver of the face-to-face interview, the State agency was required to have a payment error rate no greater than national average for the most recent fiscal year. Because error rates have dropped significantly, we have reviewed the criteria for approval of such waivers, and will now approve all waiver requests, provided that the State is not in the first year of liability status.

All waivers of the face-to-face interview will 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
- 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.

A detailed summary was posted to our web site  
[http://www.fns.usda.gov/fsp/whats\\_new.htm](http://www.fns.usda.gov/fsp/whats_new.htm) on January 24.

Details follow.

### Waivers of the Face-to-Face Interview at Initial Application

State	Expires	Description	Comments
Florida	9/30/2007	Allows the State agency to use telephone interviews in lieu of the face-to-face interview without documenting hardship.	Limited to 2 districts – 50% of caseload.
Utah	9/30/08	Allows the State agency to use telephone interviews in lieu of the face-to-face interview without documenting hardship	Effective 10/1/06. Limited to 2 districts – 50% of caseload.

### Waivers of the Face-to-Face Interview at Recertification

State	Description	Comments
Arkansas California Connecticut Delaware Illinois Indiana Ohio North Carolina Massachusetts New Mexico New York North Carolina Ohio Pennsylvania South Carolina South Dakota Tennessee Texas Utah Washington	These waivers waive the need to document hardship for all households when using a telephone interview. Documentation of hardship is not required for elderly/disabled households without earned income.	Generally, States allow worker discretion to conduct a face-to-face interview if the household's circumstances warrant.  In California, New York and Ohio, the States selected only a limited number of counties to participate in the waiver. Some States allow individual counties/offices to opt out of the waiver.
Florida Louisiana	Allows the State agency recertify households without conducting an interview and without documenting hardship.	Florida's waiver expires on 2/28/07; Louisiana's waiver expires on 6/30/07. Evaluation must be submitted before any extension is approved.