



United States
Department of
Agriculture

DEC 17 2008

Food and
Nutrition
Service

SUBJECT: SNAP – Waiver Requests to Eliminate the Interview Requirement
Altogether

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Center Drive

TO: All Regional Directors
Supplemental Nutrition Assistance Program

Alexandria, VA
22302-1500

We recently received a request from a State agency to completely waive the requirement that the State agency conduct an interview at recertification for all households. Unlike a number of similar waivers that have allowed State agencies to utilize telephone interviews in lieu of the face-to-face interview without the need to document hardship in the household's case record, the recently requested waiver would have dispensed with interview altogether, allowing the State agency to recertify the household absent a face-to-face or a telephone interview. In lieu of an interactive interview, the State agency proposed to recertify the household based entirely on the information provided by the household in the paper application for recertification.

FNS has denied that State agency's request and as a matter of policy will not approve waivers allowing State agencies to dispense with an interactive interview altogether. FNS maintains that an interactive interview is required to ensure customer service and that eliminating the interview could compromise a State agency's ability to appropriately assist the client in completing the certification process.

The interview serves a number of key functions in the certification process. It ensures that the application is complete and that applicants who need help in understanding and completing the application receive that assistance. The interview also provides an opportunity for the eligibility worker to clarify complex income rules and deductions based on an applicant's individual circumstances and to ensure that future household circumstances are reasonably anticipated. Questionable or inconsistent information can be identified and resolved through the interview process. The interview also allows the eligibility worker to properly identify all verification requirements and provide appropriate assistance to enable the household to obtain satisfactory verification. Finally, the interview provides an opportunity to ensure that key rights and responsibilities (such as reporting changes) are understood.

In light of these considerations, FNS concludes that an interactive interview is a necessary element of the certification process, despite the potential flexibility and efficiency that might result from completely eliminating the interview. Current waivers allowing the use of a telephone interview in lieu of the face-to-face interview without the need to document hardship already provide State agencies with greater flexibility while easing the burden of the in-office face-to-face interview on households, especially those with working members.

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States may gain administrative efficiencies by tailoring and targeting interviews for certain applicants. The duration of the interview may be tailored to applicant circumstances, with less intensive interviews targeted at those applicants with more stable and straightforward circumstances. It is not necessary to discuss every response on the application form and interviews are not required to be of any specific duration. State agencies may adapt their interviews for different types of situations. Applicants who present complete applications and verification should take much less time than those who require more assistance or present more error-prone circumstances.

In its request to waive the interview requirement altogether, the State agency suggested that a telephone interview could pose a burden for those households that do not have telephone service. FNS has concluded that this is insufficient justification for waiving the interview. The number of households with no access to phone service is small, and households that do not have telephone service of their own often have access to telephone service through a neighbor or pay phone service. In the rare event in which a household has no access to phone service at all and coming to the office would pose a hardship, the State agency always retains the option of a home visit, or alternatively the household may appoint an authorized representative to act on its behalf.

FNS recently approved a waiver to allow a State agency to test the use of an interactive telephone response system at recertification in lieu of either the face-to-face or the telephone interview. The waiver was limited to households with no earned income, in which all adult members are elderly and/or disabled, and which had not experienced any change in household circumstances. This population typically has very stable circumstances and tends to be fairly non-error prone. Persons reapplying under this waiver must review and actively confirm a significant amount of information and are also given the choice of a scheduled telephone interview with an eligibility worker should they not want to use the system. FNS has approved a waiver to test this approach in a limited number of offices. As a condition of this waiver, the State agency must conduct a targeted review of cases processed using this interactive tool. The results of this analysis will allow FNS to assess the effects on program access and payment accuracy. FNS will not consider similar waiver requests until such data have been submitted and analyzed.

If you have any questions, please contact me at (703)305-2494 or Sandy Clark, Certification Policy Branch Chief, at (703)305-2495.



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