



United States Department of Agriculture
Food and Nutrition Service

Western Region

Reply to
Attn of: Administrative Notice 05-26 August 8, 2005 FS-2-GEN

Subject: Clarification on the option to waive the face-to-face interview on a case-by-case basis

To: ALL WESTERN REGION FOOD STAMP PROGRAM COORDINATORS

This attached clarification provides general guidance for state agencies that elect to allow clients to fulfill their interview requirements without a face-to-face interview on a case-by-case basis.

Please contact your designated State Program Team, if you have any questions.

/s/

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Face-to-face Interview Waiver Clarification

General Guidance

In order to increase program efficiency and client access, State agencies may elect to allow clients to fulfill their interview requirement without a face-to-face interview. Face-to-face interview waivers can be offered to clients on a blanket or case-by-case basis, depending upon household circumstances. In any case, clients who request a face-to-face interview must be granted one.

Blanket Face-to-face Interview Waivers

“The State agency may opt to waive the face-to-face interview in favor of a telephone interview for all households which have no earned income and all members of the household are elderly or disabled”. 7 CFR 273.2(e)(2)

The State agency can offer a face-to-face interview waiver to any or all households in which all members are elderly or disabled and have no earned income on a blanket basis and are not required to query the household to determine if they have any additional hardship that might make them eligible for a face-to-face interview waiver.

The State can apply this blanket determination in a manner that is most suitable for the State’s Food Stamp Program operation. For example, the State may wish to either offer a telephone interview to eligible clients as an option or may choose the opposite, instituting telephone interviews for all clients with a hardship and then allowing the client to opt for a face-to-face interview if they desire it.

States may also choose to offer face-to-face interview waivers to other categories of households by determining eligibility for a face-to-face interview waiver on a case-by-case basis, as below.

Case-by-case

“The State agency must notify the applicant that it will waive the face-to-face interview required in paragraph (e)(1) of this section in favor of a telephone interview on a case-by-case basis because of household hardship situations as determined by the State agency. These hardship conditions include, but are not limited to: illness, transportation difficulties, care of a household member, hardships due to residency in a rural area, prolonged severe weather, or work or training hours which prevent the household from participating in an in-office interview”. 7 CFR 273.2(e)(2)

The State agency has the option to define hardship in a manner that agrees with local conditions and can determine eligibility for and apply a case-by-case waiver in a manner that is most suitable for the State’s Food Stamp Program operation.

For example, the State may determine that appearing at an office for an interview is a hardship for clients with earned income or for households with children under the age of 5 years. At the time that the State agency learns that a client has earned income, the State may choose to exempt any such household from face-to-face interviews, either at initial certification or at recertification. The State may

choose to either offer a telephone interview to the client as an option or may choose the opposite, instituting telephone interviews for all clients with a hardship and then allowing the client to opt for a face-to-face interview if they desire it. In effect, this case-by-case exemption could be employed as a blanket waiver for greatest efficiency of employment.

Documentation

“The State agency must document the case file to show when a waiver was granted because of a hardship”. 7 CFR 273.2(e)(2)

The State can choose to document granting of a face-to-face interview waiver in the manner most appropriate to their program operations. This may include establishing a code in the eligibility determination system, through case narrative, or through some other methodology that documents eligibility for a face-to-face interview waiver in a household's case file.

Although the State agency is allowed to request verification from households of their eligibility for face-to-face interview waivers, we expect that such verification of hardship criteria, such as having a job or having children would be accomplished through normal verification procedures. State agencies may not require households to present verification in person at the food stamp office.
7 CFR 273.2(f)(5)(i)