

October 6, 2006

SUBJECT: Face-to-Face Interview Waiver Criteria

TO: All Regional Directors  
Food Stamp Program

This is to advise you that we are expanding our criteria for the approval of waivers of the face-to-face interview at both initial and recertification. We also wish to note that since State agencies already may waive the face-to-face interview on an individual case basis based on a finding of hardship, we are now categorizing these waivers as waivers of the requirement that State agencies document hardship prior to utilizing alternatives to the face-to-face interview

Under our previous guidance, issued through a memorandum dated July 25, 2003, we advised the regional offices that in order to receive a waiver of the face-to-face interview at recertification, the State agency must have a payment error rate no greater than national average for the most recent fiscal year. 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.

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This change in policy recognizes that with a much lower national average payment error rate, states may have error rates slightly above the national average that are both below historical levels and do not trigger the current liability system. We are particularly interested in getting more data on the relationship between the type of interview and payment accuracy results. If the data show not adverse affects we would anticipate expanding the scope of these waivers.

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

/s/

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Director  
Program Development Division