



Food and Nutrition
Service

1320 Braddock Place
Alexandria, VA
22314

Date: March 26, 2020

RE: Supplemental Nutrition Assistance Program (SNAP) – Adjusting
Interview Requirements Due to Novel Coronavirus (COVID-19) –
Blanket Approval

Dear SNAP State agencies,

As authorized by section 2302 of the Families First Coronavirus Response Act (P.L. 116-127), FNS will allow State agencies to adjust:

- SNAP regulations at 7 C.F.R. 273.2(a)(2), 273.2(e), and 273.14(b)(3) by not requiring a household to complete an interview prior to approval, provided the applicant's identity has been verified and all other mandatory verifications in 7 C.F.R. 273.2(f)(1) have been completed.¹
- SNAP regulations at 7 C.F.R. 273.2(e)(2)(i) by not offering a face-to-face interview or granting a request for a face-to-face interview to any household at application or recertification.
- SNAP regulations at 7 C.F.R. 273.2(i)(3)(iii) and 7 C.F.R. 273.2(i)(4)(iii)(A) and (B) by not requiring households that are eligible for expedited service to complete an interview prior to approval, provided that an applicant's identity has been identified and an attempt has been made to contact the household for an interview.

Under the authority of Section 2302(a)(2), FNS has determined these adjustments to be consistent with what is practicable under actual conditions in areas affected by the COVID-19 Public Health Emergency.

These flexibilities are available for all applications and recertifications requiring an interview through May 2020 and contingent upon a State agency's compliance with the conditions and evaluation requirements detailed in the attached enclosures, which are due 45 days after expiration (July 15, 2020).

If the State agency elects to implement any or all of these adjustments, it must make a request to its respective FNS Regional Office and identify which ones the State agency intends to use. Any State responses will be relayed to the FNS Certification Policy Branch.

¹ If State agencies have questions regarding other regulatory references to the interview requirement, please contact FNS.

All State Agency Directors

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FNS is ready to provide technical assistance to State agencies as they seek to maintain operations and serve clients during the current Public Health Emergency. If you have any questions or need additional information, please contact your respective Regional Office representative.

Sincerely,

Sasha Gersten-Paal
Director
Program Development Division
Supplemental Nutrition Assistance Program

Enclosures

ADJUSTMENT OF INITIAL CERTIFICATION AND RECERTIFICATION INTERVIEW RESPONSE

- 1. Regulatory citation:** 7 C.F.R. 273.2(a)(2), 273.2(e), and 273.14(b)(3)²
- 2. Regulatory requirements:** Supplemental Nutrition Assistance Program (SNAP) regulations at 7 C.F.R. 273.2(a)(2) requires that the application process include an interview.

Regulations at 7 C.F.R. 273.2(e) requires that the State agency interview households for eligibility before certifying.

Regulations at 7 C.F.R. 273.14(b)(3) requires that State agencies interview households as part of the recertification process

- 3. Description of alternative procedures:** The State will not be required to interview a household at initial application or recertification, provided that the applicant's identity has been verified and all other mandatory verifications in 7 C.F.R. 273.2(f)(1) have been completed. The State will be required to contact the household if any information on the application is questionable and cannot be verified. The State will make every attempt to verify household circumstances through data matching and mailing or uploading verifications to the State system.

4. Action and reason for approval or denial: The Food and Nutrition Service (FNS) recognizes the need for adjustments due to the COVID-19 Public Health Emergency. As authorized by section 2302 of the Families First Coronavirus Response Act (P.L. 116-127), FNS' approval of this adjustment is based on the determination that the adjustment is consistent with what is practicable under actual conditions in areas affected by the COVID-19 Public Health Emergency. FNS is approving the adjustment for all applications and recertifications requiring an interview through May 31, 2020.

- 5. Conditions of approval:** FNS is approving this adjustment subject to the following conditions:

- The adjustment is limited to those households for which mandatory verifications have been completed and the applicant's identity has been verified;
- The State agency will ensure that sufficient controls in their policy and automation are in place to implement the terms of this adjustment correctly;
- The State agency will contact the household if information in the application that is required to be verified under 273.2(f)(1) is questionable and cannot be verified through a data match;
- The State agency has the capacity to provide to FNS the data required for evaluation of the caseload for which the State agency has adjusted the interview requirements.

² If State agencies have questions regarding other regulatory references to the interview requirement, please contact FNS.

6. **Evaluation Data Requirements:** The State agency must provide to FNS the data and analysis listed below required for evaluation of this adjustment:
 - Estimated number of households affected by this adjustment;
 - A narrative on the effect of the adjustment on program access and client satisfaction, including an analysis of any client or advocate complaints received related to the adjustment procedure;
 - A narrative on the effect of the adjustment on the provision of timely and accurate benefits; and
 - A narrative on the effect of the adjustment on any other aspects of the eligibility process including the ability to manage staff caseload growth and the impact on administrative efficiency.
7. **Expiration date:** May 31, 2020
8. **Quality control procedures:** No special Quality Control (QC) procedures are required for cases subject to the provisions of this adjustment. Cases should be reviewed using standard review procedures contained in the FNS Handbook 310.

ADJUSTMENT OF FACE TO FACE INTERVIEW REQUIREMENTS

1. **Regulatory citation:** 7 C.F.R. 273.2(e)(2)(i)
2. **Regulatory requirements:** Supplemental Nutrition Assistance Program (SNAP) regulations at 7 C.F.R. 273.2(e)(2)(i) require that the State agency offer a face-to-face interview or grant a request for a face-to-face interview to any household at application or recertification, in lieu of a telephonic interview.
3. **Description of alternative procedures:** The State agency may require households to complete a telephonic interview during application and recertification. The State agency will use its existing interview procedures to allow clients to complete an interview by telephone. If requested, the State agency will schedule an interview to be conducted by telephone.
4. **Action and reason for approval or denial:** The Food and Nutrition Service (FNS) recognizes the need for adjustments due to the COVID-19 pandemic. As authorized by section 2302 of the Families First Coronavirus Response Act (P.L. 116-127), FNS' approval of this adjustment is based on the determination that the adjustment is consistent with what is practicable under actual conditions in areas affected by the COVID-19 Public Health Emergency. FNS is approving the adjustment for all applications and recertifications requiring an interview through May 31, 2020.
5. **Conditions of approval:** FNS is approving this adjustment contingent upon the following conditions. The State agency must:
 - Inform clients that the State agency will schedule the interview;
 - Screen all applications for expedited service and instruct households found eligible for expedited service to complete the interview within 7 days from the date of application. The State will also be required to cold call households eligible for expedited service to attempt an interview. Nothing in this adjustment approval will absolve the State from meeting the expedited service processing standards in 7 C.F.R. §273.2(i) that require benefits to be made available to eligible households by the seventh calendar day after their application;
 - Provide households with clear, written instructions for completing the interview and the date by which the household should complete the interview requirement (calendar day);
 - Provide households eligible for expedited service that do not complete their interview by the 7th day after application, a Notice of Missed Interview (NOMI);
 - Provide households not eligible for expedited service that do not complete their interview by the 10th day after application, a NOMI;
 - Repeat instructions for completing the interview in the NOMI and inform applicants of the date on which their application will be denied or benefits terminated if the interview is not completed;

- Ensure that recipient households that are sent a NOMI during recertification and are subsequently denied have until the end of their certification period to complete the interview without having to submit a new application form;
 - Ensure that sufficient administrative and automation controls are in place so the terms of this adjustment are implemented efficiently. Phone system performance including dropped calls, wait times, call completion times, and staff adequacy must be monitored and adjusted to adequately serve incoming calls; and
 - Ensure that the adjustment does not negatively impact program access or customer service.
- 6. Evaluation Data Requirements:** The State agency must provide to FNS the data and analysis listed below required for evaluation of this adjustment:
- Estimated number of households affected by this adjustment;
 - A narrative on the effect of the adjustment on program access and client satisfaction, including an analysis of any client or advocate complaints received related to the adjustment procedure;
 - A narrative on the effect of the adjustment on the provision of timely and accurate benefits; and
 - A narrative on the effect of the adjustment on any other aspects of the eligibility process including the ability to manage staff caseload growth and the impact on administrative efficiency.
- 7. Expiration date:** May 31, 2020.
- 8. Quality control procedures:** No special Quality Control (QC) procedures are required for cases subject to the provisions of this adjustment. Cases should be reviewed using standard review procedures contained in the FNS Handbook 310.

ADJUSTMENT OF EXPEDITED SERVICE INTERVIEW REQUIREMENTS

- 1. Regulatory citation:** 7 C.F.R. 273.2(i)(3)(iii) and 273.2(i)(4)(iii)(A) and(B)
- 2. Regulatory requirements:** Supplemental Nutrition Assistance Program (SNAP) regulations at 7 C.F.R. 273.2(i)(3)(iii) require the State agency to conduct the interview (unless the household cannot be reached) and complete the application process within the expedited service standards.

SNAP regulations at 7 C.F.R. 273.2(i)(4)(iii)(A) require that for households applying on or before the 15th of the month, the State agency may assign a one-month certification period or assign a normal certification period. Satisfaction of the verification requirements may be postponed until the second month of participation.

SNAP regulations at 7 C.F.R. 273.2(i)(4)(iii)(B) require that for households applying after the 15th of the month, the State agency may assign a 2-month certification period or a normal certification period of no more than 12 months. Verification may be postponed until the third month of participation, if necessary, to meet the expedited timeframe.

When a certification period of longer than 2 months is assigned and verification is postponed, households must be sent a notice of eligibility advising that no benefits for the third month will be issued until the postponed verification requirements are satisfied. The notice must also advise the household that if the verification process results in changes in the household's eligibility or level of benefits, the State agency will act on those changes without advance notice of adverse action.

- 3. Description of alternative procedures:** The State will postpone the interview for certain households eligible for expedited service, provided that an applicant's identity has been verified and the State agency has attempted to contact the household for an interview. This will allow the State agency to provide benefits within 7 days for those expedited service eligible households. In these cases, the interview would be treated similar to other verification and could be postponed during the initial one- or two-month period. Therefore, households that apply on or before the 15th of the month would complete the interview, provide necessary verification, and have their applications processed by the end of the month of application in order to continue receiving ongoing benefits. Households that apply after the 15th of the month would complete the interview, provide necessary verification, and have their applications processed prior to the end of the month following application in order to continue receiving ongoing benefits.
- 4. Action and reason for approval or denial:** The Food and Nutrition Service (FNS) recognizes the need for adjustments due to the COVID-19 pandemic. As authorized by section 2302 of the Families First Coronavirus Response Act (P.L. 116-127), FNS' approval of this adjustment is based on the determination that the adjustment is consistent with what is practicable under actual conditions in areas affected by the COVID-19 Public Health Emergency. FNS is approving the adjustment for all applications and recertifications requiring an interview through May 31, 2020.
- 5. Conditions of approval:** FNS is approving this adjustment subject to the following conditions:

- The adjustment is limited to those households who meet the criteria for expedited service in 7 C.F.R. 273.2(i)(1);
- The State agency will ensure that sufficient controls in their policy and automation are in place to implement the terms of this adjustment correctly;
- The State agency will make efforts to complete the required interview within the 7 day time-period and will attempt to contact applicants in order to interview them prior to postponing the interview;
- The adjustment only applies to those applicants whose identity can be verified;
- The adjustment only applies to the above households at initial application;
- The State agency will assign expedited service households subject to this adjustment the normal certification periods pursuant to the following procedural requirements:
 - For households that apply on or before the 15th of the month, the State agency may postpone the interview and any required verification through the end of the month. If the household fails to participate in an interview or to provide needed verification by the end of the month, then the case will be closed. In addition, under these adjustment procedures, households that apply on or before the 15th of the month must have the opportunity to be interviewed by the last day of the month and be allowed 10 days to provide any required verification documents that may arise from the interview. Thus, interviews should be scheduled such that households would be able to provide any required documentation in time to avoid a delay in the issuance of their second month's benefits;
 - For households that apply after the 15th of the month, the State agency may postpone the interview and any required verification no later than the month subsequent to the month of application after which the case is closed if the household fails to participate in an interview or fails to provide needed verification; and
 - The notice of eligibility must clearly advise households subject to this adjustment of the postponed interview requirement and provide a specific interview appointment. In addition, the notice must clearly advise households of the closure of their case should they not participate in the postponed interview.
- If the household does not satisfy the postponed verification requirements and does not participate in the postponed interview, the State agency is not required to contact the household again and the case would be closed. The State agency would process any subsequent application(s) from the household under normal processing standards in accordance with 7 C.F.R. 273.2(i)(4)(iv);
- Households whose identities cannot be determined by the State agency do not qualify for the adjustment and must be processed under normal SNAP application processing procedures;

- and
- The State agency has the capacity to provide to FNS the data required for evaluation of the expedited service caseload for which the interview adjustment has been made.

6. Evaluation Data Requirements

The State agency must provide to FNS the data and analysis listed below required for evaluation of this adjustment:

- Estimated number of households affected by this adjustment;
- A narrative on the effect of program access and client satisfaction, including an analysis of any client or advocate complaints received related to the adjustment procedure;
- A narrative on the effect of providing timely and accurate benefits; and
- A narrative on the effect of any other aspects of the eligibility process, including the ability to manage staff caseload growth and the impact on administrative efficiency

7. Expiration date: May 31, 2020.

8. Quality control procedures: No special Quality Control (QC) procedures are required for cases subject to the provisions of this adjustment. Cases should be reviewed using standard review procedures contained in the FNS Handbook 310.