Food and Nutrition Service

1320 Braddock Place Alexandria, VA 22314 **DATE:** December 13, 2021

SUBJECT: Supplemental Nutrition Assistance Program (SNAP) – Extension

of Waiver of Quality Control (QC) Face-to-Face Interview

Requirement for January 2022 – June 2022

TO: All SNAP State Agencies

All Regions

When the COVID-19 Public Health Emergency began in March 2020, Food and Nutrition Service (FNS) quickly responded by allowing State agencies to suspend requirements at 7 CFR 275.12(c)(1) to conduct face-to-face interviews for QC active reviews. This flexibility was initially granted until September 30, 2020, and then extended through December 31, 2020. On April 30, 2021, FNS issued a memo that SNAP QC will resume nationwide starting July 2021, but provided State agencies with a blanket waiver of the QC face-to-face interview through December 31, 2021.

Under the authority of <u>7 CFR 272.3(c)(1)(i)</u>, FNS may continue to authorize waivers to deviate from specific regulatory provisions when they cannot be implemented due to extraordinary temporary situations. It is difficult for many State agencies to adhere to Federal, State, and local COVID-19 guidelines during face-to-face interviews given the constraints imposed by their office spaces and the precautions they must take to ensure participant privacy. Therefore, based on continued public health concerns and social distancing measures, FNS is now extending this waiver approval through June 30, 2022. Extending the QC face-to-face interview waiver through June 2022 will allow State agencies to complete more case reviews while ensuring the continued health and safety of QC reviewers and households.

As a reminder, regardless of the method used to conduct the personal interview; all other requirements specified in SNAP regulations at 7 CFR 275.12 remain in effect. In particular, prior to a personal interview, households must be notified they have been selected, as part of an ongoing review process, for review by quality control and that an interview will be conducted in the future. It is recommended notices include the date, time, and location for the interview and the type of information the household must have available during the interview. This practice will not only help States obtain verification of household circumstances, but will also assist in completing cases.

States must ensure all QC cases in which this waiver applies is documented to show the reason a face-to-face interview was not used. Item 69 on the FNS 380-1 must be coded, "1-Telephonic personal interview with household".

FNS understands the public health emergency continues to affect SNAP households and State agency operations, so flexibilities like this waiver are intended to assist States in these unique times. However, these face-to-face interview waivers for QC are for temporary situations when regulatory provisions cannot be implemented. States are encouraged to begin planning for an eventual transition to normal QC operations when these waivers will no longer be available.

If a State elects to continue conducting QC interviews by telephone, the State must, prior to implementation, accept the blanket waiver in the SNAP Waiver Information Management System (WIMS) using the steps listed below. Any State WIMS User can log in and accept the blanket waiver. Please coordinate within your State to determine which WIMS User will take the action to accept.

States can begin accepting the waiver after Tuesday, December 14, 2021.

- 1. On the Navigation Bar, click on 'MORE' and select 'BLANKET WAIVERS.'
- 2. Click on the Blanket Waiver with the subject: 'QC F2F Waiver Extension to June 2022.'
- 3. Navigate to the Feed tab and select 'Accept Blanket Waiver.'
- 4. Click on the 'Accept Blanket Waiver' checkbox.
- 5. Enter an implementation and expiration date. Note this blanket waiver can be applied within the window of January 1, 2022 through June 30, 2022.
- 6. Click 'Next.' A message will appear stating: 'You have successfully accepted the Blanket Waiver.'
- 7. After your State has accepted the blanket waiver, it will appear in your in your active waivers tab with the subject 'QC F2F Waiver Extension to June 2022.'

To help FNS understand the impact this waiver has on completion rates and household cooperation, FNS asks States to voluntarily provide information about any observed impacts this face-to-face interview waiver has had on the following:

- Your State's completion rate;
- Household cooperation with QC; and
- Number of penalties that are referred to eligibility for households refusing to cooperate with the QC reviewer.

Please provide the above information in WIMS, using these steps:

- a. Navigate to the active waiver
- b. Go to the feed tab
- c. Select 'Post'
- d. Enter the information described above
- e. Tag Lacy O'Neal (by typing @lacy.oneal) and your respective regional office contact to send them an email alert about the post; and
- f. Click 'Share'

All SNAP State Agencies Page 3

State agencies with questions should contact their respective regional office representatives.

FNS is available to provide technical assistance to State agencies as they continue operations and serve clients during the ongoing public health crisis.

Maribelle Balbes Acting Director Program Accountability and Administration Division