



Food and Nutrition Service  
U.S. DEPARTMENT OF AGRICULTURE



# State SNAP Interview Toolkit

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# State SNAP Interview Toolkit

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# Introduction

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The interview is the most important step in the certification process for the USDA, Food and Nutrition Service's (FNS) Supplemental Nutrition Assistance Program (SNAP) as it serves several key functions. It is an opportunity to ensure the SNAP application is complete, to engage with applicants to fully understand their household circumstances, and to provide the assistance needed to understand their responsibilities in the certification process. This toolkit focuses on SNAP interviews, requirements, and best practices. The interview also offers the opportunity to engage with households about needs beyond SNAP and to offer other State services that may be of assistance such as cash assistance, childcare, or referrals to other supports that might address household concerns.

Eligibility workers play an essential role in ensuring people in need get the benefits they are entitled to while preserving and protecting the integrity of the SNAP program. During the interview, eligibility workers:

- Discuss aspects of the application that the household did not complete
- Screen household members for exemptions from certain SNAP rules
- Identify and resolve questionable or inconsistent information
- Explain complex rules to the household and answer questions
- Explain household rights and responsibilities
- Identify all verification requirements and assist the household in obtaining needed verification

The following assumptions apply throughout this toolkit, unless otherwise indicated:

- The term "applicant" or "household member" includes authorized representatives
- The interview requirements apply to both applications for initial certification and recertification, at least once every 12 months
- This guide applies exclusively to SNAP requirements

## Purpose of the Toolkit

The purpose of this toolkit is to be a resource for State SNAP agencies as they seek to improve their interview processes. The toolkit summarizes SNAP interview policy and highlights best practices. It is a resource for State SNAP agencies as they conduct interviews, train staff, and/or look for ways to improve their interview processes.

In general, it provides the following:

- Regulatory basis for SNAP interviews
- Requirements and best practices for each step in the interview process
- Options and flexibilities States have in administering interviews, including available waivers

### Key Points

- States are required to perform interviews at initial certification and at least once every 12 months thereafter for recertification.
- The interview is critical to ensure clients receive accurate benefits.
- States can use policy and administrative choices to target interviews, create efficiency, and improve customer service.

**This toolkit does not provide new or modified policy guidance. It was originally published in March 2023 and was updated in June 2025 to include screening for non-citizen requirements and other updates.**

## Timing and Context for Interviews

States must interview a member of the household or its authorized representative before certifying an applicant household, including a household entitled to expedited service. In addition, States must conduct an interview at least once every 12 months for recertification.

For the household to receive SNAP, the eligibility worker conducting the interview must only consider factors affecting SNAP eligibility and benefits. If the household is simultaneously applying for other programs such as Medicaid, Temporary Assistance for Needy Families, or another program and fails to answer questions or provide information specific to that program, these actions cannot negatively impact SNAP eligibility.

## Regulatory Basis for Interviews



**Initial certification.** An eligibility worker must interview a household member at initial certification and must schedule the interview as promptly as possible to ensure eligible households receive an opportunity to participate within 30 days after the application is filed. *7 CFR 273.2(e)*



**Expedited service.** If a household is identified as eligible for expedited service, an eligibility worker must interview a household member in time to meet the 7-day expedited issuance deadline. The interview provides an opportunity to advise the applicant of the timeline for returning any postponed verification so SNAP benefits can continue. *7 CFR 273.2(i)*



**Recertification.** An eligibility worker must interview a member of a household applying for recertification at least once every 12 months, for households certified for 12 months or less. Exception: For elderly and disabled households with certification periods greater than 12 months, an eligibility worker must interview applicants for recertification at the end of the certification period. *7 CFR 273.14(b)(3) and 7 C.F.R. § 273.2(e)(1)*

## Core Requirements

Once an application is filed, States must ensure the following program rules are followed:

- Only State agency merit system personnel are authorized to conduct SNAP interviews and determine eligibility. These interviewers are commonly referred to as “eligibility workers” (for information about using non-merit pay staff to interview, see the section [Operational Considerations](#)).
- Eligibility workers must provide applicants with an opportunity to interview before an eligibility decision is made.
- Eligibility workers must interview the head of the SNAP household, spouse, any other responsible member of the household, or an authorized representative. The eligibility worker must allow the applicant to bring any person they choose to the interview.
- Eligibility workers must conduct the interview as an official and confidential discussion of household circumstances and protect the applicant’s right to privacy during the interview.

**Options and flexibilities:** States have considerable flexibility regarding the length of the interviews, as long as they complete the required components. To increase efficiency, States may focus the interview

specifically on the items in the application that appear to make the applicant ineligible, such as excessive income or resources. While this approach enables States to tailor the interview to the household's circumstances, States must ensure that the applicant is given the opportunity to ask questions, explain any questionable information, and understand the process so the State can determine eligibility timely and accurately.

## Initiating the Interview

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This section discusses the first steps in the interview process, including scheduling, accommodating special circumstances, client communications and notices, and refusal to cooperate. While some States waive certain scheduling requirements and offer “on-demand” interviews (for more information, see the section [Waivers](#)), most of the requirements and best practices in this section still apply.

### Scheduling the Interview

States must ensure accurate eligibility determinations, and the interview is key in supporting program integrity. States must interview all households that submit a valid application, which includes a name, address, and signature. Unless States interview households on the same day they submit their application, States must schedule an interview. States should schedule interviews as promptly as possible to ensure eligible households receive an opportunity to participate within 30 days after filing an application (and within 7 days if the household meets the criteria for expedited service). *7 CFR 273.2(e)(3), 7 CFR 273.2(i)(3)*

To the extent practicable, States must schedule the interview to accommodate the needs of groups with special circumstances, including working households. For in-person interviews, States must also consider and accommodate households with special needs (such as households with elderly or disabled members) or hardships as much as possible when scheduling interviews. Hardship conditions include, but are not limited to, the following:

- Illness
- Transportation difficulties
- Care of a household member
- Hardships resulting from residency in a rural area
- Prolonged severe weather
- Work or training hours that prevent the household from participating in an interview

The State must grant a face-to-face interview to any household that requests one. Additionally, the State may provide a home-based interview as it deems necessary if a household meets the hardship criteria and requests one. States may also request a waiver to offer videoconference interviews in addition to in-person face-to-face and telephone interviews (for more information, see the section [Waivers](#)). *7 CFR 273.2(e)(2)*

## Communicating With Households About Scheduled Interviews

When communicating with households about interview scheduling, States may choose to send a written notice to the applicant household informing it of the date, time, and location of the interview. FNS considers a written notice to be a best practice and encourages States to keep a copy of written notices in the case file. States may also call the household to schedule an interview. When the interview is scheduled telephonically, States must document these calls to show that an interview was scheduled and that the time and place were communicated to the household.



**Expedited service.** States must schedule the interview for applicants entitled to expedited service in a timeframe that enables them to meet the 7-day processing standards. The State must conduct the interview before an eligibility determination is made, consistent with all other applicant households. While verification may be postponed, the interview must follow standard protocols to provide information and explore the applicant's circumstances. *7 CFR 273.2(i)*



**Notice of Missed Interview and rescheduling.** States must send a Notice of Missed Interview (NOMI) when a household misses its interview appointment to notify the household it missed the scheduled interview and that it is responsible for rescheduling the interview. The State must schedule a second interview if the household contacts the State within the 30-day processing period. *7 CFR 273.2(e)(3)*



**Denial for missed interview.** The State must send the household a notice of denial on the 30th day following the application date if the household has not responded to the NOMI. States may combine the NOMI with the notice of denial at recertification. *7 CFR 273.2(e)(3), 7 CFR 273.2(g)(3), 7 CFR 273.14(b)(3)*



**Refusal to cooperate.** The State must deny the application at the time of refusal if a household refuses to cooperate in completing the certification process, including the interview. For a determination of refusal to be made, the household must be able to cooperate but clearly demonstrate that it will refuse to take the actions required to complete the application process. For example, to be denied for refusal to cooperate, a household must refuse to be interviewed and not merely fail to appear for the interview. The State must not deny the household's application if any question exists as to whether the household has failed to cooperate, as opposed to refused to cooperate. *7 CFR 273.2(d)(1)*

States are not allowed to deny an application prior to scheduling an interview, even if information on the application suggests ineligibility. Applicants who appear to be ineligible based on their application information may provide information during the interview that shows they are in fact eligible. This situation could happen for many reasons, including the applicant inadvertently omitted information on their application or struggles with literacy, educational, or language barriers.



For example, a household may have made a typographical or clerical error. If the household has limited English proficiency (LEP), it may need translation services to understand questions sufficiently to accurately answer them. An interactive interview enables eligibility workers to clarify statements, confirm applicants understand the questions asked and correctly answer them, and ensures the most accurate information is used to determine eligibility.

### Interview Is Key to SNAP Approval or Denial

- States cannot approve a SNAP application, including for households potentially entitled to expedited service, prior to conducting an interview.
- States cannot deny an application without offering the household an interview, even when the application includes information suggesting ineligibility.

**Options and flexibilities:** Some States have requested a waiver of the requirement to schedule an interview and instead allow applicant households to call for an interview within a set period after application (for more information, see the section [Waivers](#)).

## Conducting the Interview

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SNAP interviews serve three primary purposes:

1. **Explore** and clarify the household's circumstances and identify information that needs to be verified.
2. **Screen** the household for circumstances that pertain to special SNAP rules, such as expedited service, work requirement exemptions, student requirements, and non-citizen requirements, including for sponsored non-citizens.
3. **Provide** information to the applicant household regarding its rights and responsibilities under the SNAP regulations and explain SNAP program requirements.

### Exploring

The interview is an opportunity for the eligibility worker to explore the household's financial and nonfinancial circumstances and review the application details and any other information available, such as data matches. Eligibility workers must not simply restate the application information but must address and resolve with the household unclear and incomplete information.



**Getting started.** A good practice is for the eligibility worker to establish SNAP household composition early in the interview by discussing family relationships, who in the home might purchase and prepare food separately, and any other factors that could exclude individuals from participating in SNAP or make them mandatory members. Once household composition is established, the eligibility worker can focus the interview on each household member's income, deductions, resources, and any other relevant household circumstances.

**Asking questions.** Based on responses to questions and information in the application, eligibility workers should attempt to identify and resolve inconsistencies while the household is engaged in the interview. For example, if the household's monthly income is less than its monthly expenses, eligibility workers should ask if the household receives any other sources of income or assistance (such as from a family member) that was inadvertently left off the application. Eligibility workers should avoid leading



questions and instead ask open-ended questions to explore applicants' circumstances. This encourages individuals to answer in their own words and avoids asking yes or no questions when there could be potential for confusing or misleading answers. This also enables the eligibility worker to inquire further on potential inconsistencies. For example, if an eligibility worker has information that an individual might be experiencing homelessness, they should ask "What is your current living situation?" instead of "Are you currently homeless?" This allows the worker to have a conversation with the applicant about their living circumstances.

It is important to be mindful of applicants' circumstances during the interview and communicate information as clearly and simply as possible. If additional questions remain about the application at the end of the interview, the eligibility worker must pursue verification. SNAP rules require verification of all eligibility and benefit level factors that the State determines to be questionable. *7 CFR 273.2(f)(2)*

**Listening to the applicant.** During the interview, eligibility workers should ask well thought out questions and practice active listening skills. Active listening has two components. The first is listening carefully to what the applicant is saying to gather accurate information. The second is demonstrating that the interviewer is listening by letting the applicant know what the interviewer hears and noting what the applicant tells the interviewer. As a best practice, eligibility workers' listening skills could include the following:

- Listen and make sure you understand what the household is saying and avoid making judgments about what you hear.
- Show that you are listening by responding using words or phrases such as "I see," "go on," and "I understand."
- Paraphrase what the household has told you at appropriate intervals, using their words as much as possible without adding any details. Try to use fewer words to get to the point. Paraphrasing affords households an opportunity to correct any part of the conversation they feel you misunderstood. If an applicant seems confused or unsure about anything you have paraphrased, ask additional questions to clarify their circumstances.

**Changes.** Households are required at the certification interview to report all changes that have occurred between the application date and the interview related to households' SNAP eligibility and benefits. Consequently, eligibility workers should ask applicants about such changes. *7 CFR 273.12(a)(3)*

**Collection of racial/ethnic data.** States must inform applicants that supplying racial/ethnic information is voluntary, that it will not affect their eligibility or benefit levels, and that the reason for the information is to ensure program benefits are distributed without regard to race, color, or national origin. States should encourage applicants to self-identify their race and ethnicity. State agencies should not use visual observation as it is unreliable and can be biased.

#### **Current Rulemaking on the Collection of Racial and Ethnic Data**

Current SNAP regulations at *7 CFR 272.6(g)* state if the household does not provide race and ethnicity information, the State must develop alternative means for collecting the data, such as observation during the interview. However, based on an FNS review of this issue and its determination that using observation results in unreliable data, the U.S. Department of Agriculture published a proposed rule on June 27, 2022, that would modify the regulatory language to remove the reference to using observations and recommend that States use data from other reliable sources.

## Screening

At the time of the interview, eligibility workers must evaluate information concerning each individual in the household to determine if any of the following apply.

**Expedited service.** Prior to the interview, States must have procedures in place to identify households eligible for expedited service at the time the household submits its application, so that an interview is scheduled in time to meet expedited processing timeframes if necessary. While other State employees may do this initial screening, the interviewer should also screen households for entitlement to expedited service. If the interviewer discovers the household is entitled to expedited process, the application should be processed as quickly as possible even if the 7-day standard cannot be met. *7 CFR 273.2(i)(2)*

**General work requirements.** Individuals ages 16 through 59 must comply with general work requirements as a condition of eligibility unless they meet one of the exemptions from this requirement. States must screen each individual for all exemptions to identify if they are subject to the general work requirements. This determination should be based on discussion and exploration with the individual or their Representative. The eligibility worker must make this determination at initial application, recertification, and when certain changes in household circumstances are reported.

The interview is the most important tool for identifying whether an individual meets an exemption. When the interview is conducted over the phone rather than in person, identifying physical or mental fitness can be more challenging; therefore, eligibility workers should have necessary resources and must follow appropriate processes to ensure applicants and recipients are properly screened. Such resources can include a complete list of each exemption with explanations and examples, or scripted questions related to different exemptions. *7 CFR 273.7(b)*

Exemptions from general work requirements consider factors that may not be clear in the application, such as the following:

- Physical or mental unfitness for employment
- Already working 30 hours a week or earning at least 30 times the minimum wage per week
- Responsibility for a child under 6 or an incapacitated person
- Compliance with the work requirements of another program
- Enrollment in higher education or a training program

**Referral to SNAP Employment and Training (SNAP E&T).** The State is responsible for screening each work registrant to determine whether or not, based on State criteria, to refer the individual to a SNAP E&T program. If appropriate, the eligibility worker would then refer the individual to the SNAP E&T program (also referred to as “SNAP E&T activity”). *7 CFR 273.7(c)(2)*

Screening for appropriateness for SNAP E&T is a separate process from screening for and identifying exemptions from the general SNAP work requirements and from the able-bodied adult without dependents (ABAWD) rules. The eligibility worker must thoroughly explore whether the individual meets the State’s criteria for participation in SNAP E&T. Applicants are not responsible for self-identifying whether they should be referred to a SNAP E&T program. Screening for referral to SNAP E&T is a certification function and can be performed only by State SNAP agency merit system personnel.

**ABAWD work requirement.** Accurate screening of ABAWDs is fundamental to the State's implementation of the time limit to ensure that those who can work, do. A subset of individuals subject to the general work requirement are also required to meet the ABAWD work requirement to receive SNAP benefits beyond the 3-month time limit. Individuals aged 18 through 54 must comply with ABAWD work requirement as a condition of eligibility unless they meet one of the exceptions from this requirement.\* States must screen each individual for all exceptions from the time limit to determine if they are subject to the ABAWD work requirement.

*\*Unless otherwise changed by law, the exceptions end on October 1, 2030, and the age limit reverts from "55 years of age or older" to "50 years of age or older". 7 CFR 273.24(c) and (k)*

**Students.** States are responsible for identifying if a household member is a student who may be ineligible to participate in SNAP. Students are ineligible for SNAP if they are enrolled at least half time in an institution of higher education unless an exemption applies. See [SNAP Institutions of Higher Education and Student Eligibility Rules](#). 7 CFR 273.5

**Felons.** States must require that individuals applying for SNAP benefits attest to whether the individual or any other member of the household has been convicted of certain felonies as an adult and whether the convicted member is complying with the terms of the sentence. Attestations may be made during the interview and may be in writing, verbal, or both, provided that the attestation is legally binding in the law of the State. However, no individual may be required to come to the SNAP office solely for an attestation. 7 CFR 273.2(o)(1), 7 CFR 273.11(s)

**Non-citizens, including sponsored non-citizens.** Non-citizens must meet SNAP's non-citizen eligibility criteria in addition to all other SNAP financial and non-financial eligibility requirements. States are responsible for identifying if a non-citizen is eligible for SNAP based on their immigration status and other factors if applicable, such as number of years in that status. This includes identifying whether a non-citizen applying for SNAP benefits has a sponsor and is subject to sponsor deeming. Under program rules, non-citizens whose sponsor signed an affidavit of support are subject to sponsor deeming unless they are exempt. Deeming is a process in which the income and resources of the sponsor are included in the non-citizen's eligibility determination for SNAP benefits. Deeming applies only to eligible Lawful Permanent Residents (LPRs) whose sponsor has signed a legally binding affidavit of support (known as 213A affidavits, mostly I-864 forms) on or after December 19, 1997.

States are required to determine if a non-citizen is subject to sponsor deeming and collect sponsor information during the certification process, making the interview an important time to ensure the State has all necessary information. Eligibility workers should determine if a non-citizen is an LPR with a

Exceptions from ABAWD requirements consider factors that may not be clear in the application, such as

- Pregnancy
- Physical and mental unfitness for employment
- Sharing a household with someone under 18
- Exemptions from general work requirements
- Homelessness\*
- Aging out of foster care\*
- Veterans' status\*



sponsor who has signed an affidavit of support and whether the non-citizen meets an exemption from sponsor deeming. Workers can check whether someone has a sponsor through the Systematic Alien Verification for Entitlements (SAVE). During the interview, eligibility workers should ensure the non-citizen has provided information about the sponsor's income and resources and must assist the household in obtaining necessary verification. FNS also encourages States to inform sponsored non-citizens during the interview about sponsor liability for the value of SNAP benefits received by the sponsored non-citizen. See [SNAP Eligibility for Non-Citizens](#) and [SNAP Guidance on Non-Citizen Eligibility](#)—detailed information on sponsor deeming and sponsor liability starts on page 30. *7 CFR 273.4(c), 8 CFR 213a.4(a)*

Non citizens who are exempt from sponsor deeming:

- Children
- Battered spouses or children
- Non-citizens without sponsors
- Non-citizens whose sponsor has not signed a legally binding affidavit of support (including those who are sponsored by an organization or group as opposed to an individual)
- Non-citizens who are a member of their sponsor's SNAP household
- Indigent non-citizens
- Sponsored non-citizens ineligible for SNAP

Situations when sponsor deeming ends include:

- Sponsored non-citizen becomes a naturalized citizen
- Sponsored non-citizen can be credited with 40 qualifying quarters of work
- Sponsor dies

## Providing Information

The third purpose of the interview is to provide information and explain the program. Eligibility workers must advise households of their rights and responsibilities during the interview, including the appropriate application processing standard and the household's responsibility to report changes. Among household's rights are:

- The right to file an application as long as it contains the applicant's name, address, and signature
- The right to file an application without having an interview first
- The right to be interviewed so that incomplete information is thoroughly reviewed and examined and that applicant rights and responsibilities are explained

This information may be provided through whatever means the State deems appropriate. For example, States may pause an interview to play a recorded message explaining the household's rights and responsibilities, as long as the household is afforded an opportunity to ask questions of an eligibility worker. *7 CFR 272.5(b)*

**Household reporting responsibilities.** For households assigned to simplified reporting, the eligibility worker must provide the household at the initial certification and recertification with a written and oral

explanation of how simplified reporting works. For households required to submit a periodic report, the worker must provide a written and oral explanation of the reporting requirements, including the following:

- The additional changes that must be addressed and verified in the periodic report
- When the report is due
- How to obtain assistance in filing the periodic report
- The consequences of failing to file a report

For households subject to change reporting or other reporting systems, eligibility workers must provide a change report form to newly certified households at the time of certification or recertification and should explain what must be reported and the required time frame for reporting changes. As with simplified reporting, the interview is the best opportunity to communicate these requirements to applicants. *7 CFR 273.12(a)*

**Notice of work requirements.** Eligibility staff must provide a comprehensive oral explanation to the household of each applicable work requirement pertaining to individuals in the household. It is a best practice for States to provide the oral explanation during the interview and to allow the household to ask clarifying questions; however, it is not required to occur as part of the interview. States must also provide a written notice of all work requirements and identify which household member is subject to which work requirement. This applies to the general work requirements, including mandatory SNAP E&T and the ABAWD work requirement. FNS published a customizable model consolidated work notice and plain language script that State agencies can use as a resource to fulfill this requirement. These tools can be found as part of the [SNAP Model Notice Toolkit](#). *7 CFR 273.7(c)(1)(ii)-(iii)*

**Social Security numbers (SSNs) and privacy considerations.** Eligibility workers must notify all households applying for SNAP benefits of the following information:

- The information required by the application, including SSNs of each household member, is used to determine SNAP eligibility and is authorized under the Food and Nutrition Act of 2008. The State may verify the information through computer matching programs to monitor compliance with program regulations.
- This information may be shared with other Federal and State agencies for official examination and with law enforcement officials for the purpose of apprehending persons fleeing to avoid the law.
- If a SNAP claim arises against the household, the information on its application, including all SSNs, may be referred to Federal and State agencies and private claims collection agencies for claims collection action.
- Providing the requested information, including the SSN of each household member, is voluntary. **However, individuals who do not provide an SSN will not receive SNAP benefits.** Any SSNs provided will be used and disclosed in the same manner as SSNs of eligible household members.

As a best practice, this information may be included on the application or recertification document or on a supplemental notification provided with all applications. If the information is provided in written form, it does not need to be covered verbally. *7 CFR 273.2(b)(4)*

## Concluding the Interview

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The conclusion of the interview is critical to ensuring that the case will be processed accurately, timely, and in accordance with Federal rules.

**Summarize the interview and next steps.** At the conclusion of the interview, it is good practice to summarize the interview to check both the eligibility worker's and the household's understanding of what transpired and what will happen next. Eligibility workers should emphasize the importance of submitting any needed verification and, if possible, tell applicants when they can expect to hear about the household's eligibility (this can reduce inquiries from applicants checking on their case status). Eligibility workers should inform the applicant about the various ways they can submit information. If households indicate they will need assistance obtaining required verification, eligibility workers are required to assist them. *7 CFR 273.2(f)(5)*

**Provide information from the application.** The State must provide households that complete an online electronic application with the opportunity to review the electronically recorded information and obtain a copy of that information for their records. This policy also applies to an interactive application and interview when a household answers the intake worker's questions either face-to-face or via telephone, and the intake worker records the household's answers electronically. Eligibility workers must allow applicable households to review and obtain a copy of the information without households having to request this opportunity. Eligibility workers must offer this information to each applicable applicant. *7 CFR 273.2(c)(1)*

**Document.** Eligibility workers must document case records to support eligibility and benefit level determinations. Documentation must be in sufficient detail to permit a reviewer (such as a Quality Control reviewer) to determine the reasonableness and accuracy of the determination. The more complex the household's composition and financial circumstances are, the more important it is that eligibility workers have clear documentation to substantiate their eligibility and benefit level determinations. *7 CFR 273.2(f)(6)*

## State Administration and Policy Choices

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### Operational Considerations

Key considerations for interviews include the use of call centers, non-merit pay staff, and how to provide services to LEP individuals.

**Interviews from call centers.** Advancements in technology and business process innovations, including the use of call center staff to conduct interviews, can give States more options to serve households and improve administrative efficiency and effectiveness while continuing to meet Federal requirements. For States that establish call centers, the centers must be fully functional, be appropriately staffed, have the system capacity to handle a large volume of calls, and be able to measure essential aspects of customer service (for more information about on-demand waivers, see [Waivers](#)).

- The implementation of a call center, including any change in the functions or responsibilities currently assigned to State employees, is considered a major change. *7 CFR 272.15*
- States are required to submit a Major Changes Notification at least 120 days before implementing a major change.



- FNS will review the submission and, if the change is considered a major change under the rule, respond with the State's necessary reporting requirements.

**Use of non-merit pay staff to interview.** State employees hired under a merit system are the only employees who may conduct SNAP certification interviews and determine eligibility. *7 CFR 272.4(a)*

While non-merit staff cannot conduct the actual interview, FNS has provided guidance on tasks they can complete, with FNS approval. See [Revised Guidance for Use of Vendor/Private Staff in Call Centers: 2020 Update](#).

**Language services for LEP households.** States must provide LEP households with bilingual personnel during the interview if a substantial number of households with low income speak the same non-English language (and who do not contain adults fluent in English as a second language) in that area of the State. The State must meet its obligations under Executive Order 13166 and Title VI of the Civil Rights Act of 1964 by supplying competent language services to all LEP households free of cost. *7 CFR 272.4(b), 7 CFR 273.2(e)(2)(iv)*

Generally, it is not acceptable for States to rely on an individual's family members or friends to provide interpreter services. In rare emergency situations, the State or recipient may rely on a person's family members or other persons whose language skills and competency in interpreting have not been established.

## Policy Options

States have flexibility in how they administer SNAP. However, States should review the effectiveness of their eligibility interviews and processes to ensure program integrity. Regarding interviews, States are encouraged to conduct face-to-face interviews. States may also provide telephone interviews and accept telephonic and gestured signatures. States should carefully evaluate their use of telephone interviews and ensure they are used appropriately. These policy options are provided by regulation and do not require a waiver.

**Telephone and face-to-face interviews.** States may conduct face-to-face interviews at the SNAP office or other mutually acceptable locations, including a household's residence. While not common, if an interview will be conducted at the household's residence, the State must schedule it in advance with the household. States have the option to use telephone interviews for all applicant households, for specified categories of households, or on a case-by-case basis because of household hardship situations, as determined by the State. *7 CFR 273.2(e)(2)*

- A State that chooses to interview households by telephone instead of the face-to-face interview must specify this choice in its State Plan of Operation and describe the types of households that will be routinely offered a telephone interview in place of a face-to-face interview.
- States must inform each applicant of the opportunity for a face-to-face interview at the time of application and recertification.
- States must grant a face-to-face interview to any household that requests one, even if a State has elected the option to routinely provide telephone interviews.
- States must provide any household that meets hardship criteria a telephone interview.
- The hardship conditions include illness, transportation difficulties, care of a household member, hardships related to residency in a rural area, prolonged severe weather, or work or training



hours that prevent the household from participating in an in-office interview.

- States may provide a home-based interview only if a household meets the hardship criteria and requests one.
- The use of telephonic interviews may not affect the length of a household's certification period.

**Telephonic and gestured signatures during an interview.** States have the option to accept telephonic signatures or gestured signatures for individuals unable to provide spoken assent. Gestured signatures mean a household's attestation or assent through a purely visual language, such as American Sign Language. *7 CFR 273.2(c)*

- A State cannot force any household to use unwritten signatures.
- If a State chooses to explore this option, FNS recommends that they first consult legal counsel to verify that the verbal assent constitutes a valid signature under State law.
- This State option applies to applications submitted at initial certification and recertification.
- This State option allows people with less acute vision, less acute hearing, or limited mobility to apply more easily, and allows States to accept applications and conduct interviews with less administrative burden.
- If a State chooses to adopt this option, it must specify in its State Plan of Operations that it has accepted this option.
- When an application is being taken over the phone simultaneously with the interview, States must treat the date of the spoken signature as the date of application. In addition, States must allow the household the opportunity to review all information taken orally and make corrections as appropriate.
- A State's system for accepting spoken signatures must comply with SNAP's bilingual requirements for the use of appropriate bilingual personnel and printed material in the administration of the program.

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#### **Example: How Does the Telephonic Signature Work?**

A State conducts an interview with a SNAP household over the telephone. At the end of the interview, the person being interviewed is asked to affirm that the information is correct and that they understand their rights and responsibilities. An audio recording of the agreement is made and linked to the case. That spoken agreement is one example of a telephonic signature. The interview and the signature then become part of the household's permanent case record.

FNS announced on August 15, 2022, that States can request waivers that allow for alternative methods for recording telephonic signatures through means other than creating an audio recording of the verbal attestation. Under this waiver, the State would need to document the verbal attestation in the case file and provide the client a written copy of the completed application, with instructions for correcting errors or omissions.

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## Waivers

In 2012–2013, FNS completed a research study in which two States administered a demonstration project to eliminate interviews for a sample group of the population. The study did not present persuasive evidence to support elimination of the interview as a standard process. However, States may wish to consider two waivers that involve interviews: the interview waiver for elderly/disabled households with no earned income and the on-demand interview waiver.

**Interview waivers for elderly or disabled households with no earned income.** Several States have requested waivers from FNS to forgo the requirement to conduct an interview at recertification for households that have no earned income and in which all adult members are elderly or disabled, provided the household meets all other recertification requirements.

- When approved, FNS allows States to waive the interview scheduling requirements. *7 CFR 273.2(e)(2) and 273.14(b)(3)*
- The household may contain children or disabled children, but the presence of disabled children is not a criterion for the household to qualify for the waiver.
- These waivers typically require alternative procedures by which States must continue to interview any household in this category that requests an interview or in situations with outstanding questions or issues.
- Under this waiver, interviews at certification are still required.
- States must provide these households with appropriate information on the excess medical deduction so that these households know how to claim this deduction.

**On-demand interview waivers.** Many States request waivers from FNS to conduct unscheduled interviews or on-demand interviews. *Waiver of 7 CFR 273.2(e)(3) and 7 CFR 273.14(b)(3)(iii)*

- When approved, FNS allows States to waive the interview scheduling requirements. Instead of scheduling a specific date and time for an interview, States provide households the option to complete a telephone interview at their convenience within a specified time.
- These waivers typically require alternative procedures by which households have the option to complete a telephone interview at their convenience within 10 days.
- Households receive a notice informing them to contact a call center during normal business hours within a set number of days, typically 10 days.
- States must send a NOMI to applicants who do not complete their interview within those 10 days.
- The NOMI instructs applicants to call for their interview by the 30th day from the application date, or the application will be denied.

To ensure good customer service and applicant access, FNS typically approves these waivers only if States meet the following requirements:

- Inform applicants that the State will schedule the interview or provide a face-to-face interview on request.
- Screen all applications for expedited service, and process expedited service applications following the applicable procedures.

- Repeat the instructions for completing the interview in the NOMI and inform applicants of the date their application will be denied or benefits terminated if the interview is not completed.
- Ensure sufficient administrative automation controls are in place so the terms of this waiver are implemented efficiently. The State must monitor and adjust phone system performance and staff adequacy to serve incoming calls, with dropped calls, wait time, and call completion time to conform with industry standards.
- Provide FNS with specific administrative data reports at regular intervals. These data allow States and FNS to measure the waiver's effect on applicant access, average interview wait times, timeliness, customer service, and other aspects of the certification process.

On-demand waivers have potential benefits:

- When States have the staffing capacity and system resources to implement this waiver effectively, the process can provide a convenient and customer-friendly way to conduct interviews, especially for working households.
- This waiver can provide administrative relief by reducing in-office wait times and decreasing the no-show rate for scheduled interviews.

States that have demonstrated positive outcomes with this waiver attribute their success to the following practices, resources, and technologies:

- Before waiver implementation, establishing a call center that is fully functional, appropriately staffed, has the system capacity to handle a large volume of calls, and can measure key aspects of customer service.
- Prioritizing customer service and preventing unreasonable interview wait times.
- Placing incoming calls not immediately connected with an eligibility worker for interview into a queue.
- Providing approximate wait times for callers placed into a queue and allowing the customer to decide whether they should remain on the line or call back later.
- An organizational understanding that callers expect telephone wait times to be shorter than in-office wait times and that prolonged call wait times cost applicants time and money.
- Providing access to language lines or an alternative for non-English speaking applicants
- Developing a system to monitor calls that enables managers to review performance and workflow and to adjust staff levels as needed to decrease call wait times.
- Providing an independent, alternative phone number for applicants who wish to request a face-to-face interview to reduce confusion and decrease the overall incoming call volume for the on-demand call center.

States that have encountered challenges with on-demand waivers that hinder successful implementation indicate the following issues:

- Call centers that are not fully functional and that fail to provide sufficient access to the interview.
- Call centers that share the same network/system or number as that of the general State or local offices, causing congested phone lines, prolonged wait times, and system crashes.

- Call systems that allow for voicemails; listening to messages can be time-consuming, and the content can be difficult to interpret or mistakenly deleted.
- Failure to provide applicants the opportunity to interview face-to-face.
- Failure to properly screen all applications for expedited service and lack of effort to contact potential expedited service households for interview, resulting in timeliness issues.

**Allow videoconference interviews.** A few States have requested waivers from FNS to allow the State to offer videoconference interviews in addition to in-person face-to-face and telephone interviews.

- These waivers typically require alternative procedures by which States offer the videoconference interview as an additional option but must grant an in-person face-to-face interview if the household requests.
- States must provide households with a secure and private platform for completing the interview, clear instructions for how to access the platform, and a telephone number to contact if the videoconference is disrupted.
- States also must ensure the technology is sufficient to implement the waiver and must monitor videoconference performance, including dropped or unreliable connections, to ensure clients can complete the interview.

For more information on interview policy, best practices, or waivers, State agencies should contact their FNS Regional Office. For points of contact, see [FNS Regional Offices](#).