



Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Transitional Assistance
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Field Operations Memo 2009-63A
November 23, 2009

To: Transitional Assistance Office Staff
From:  John Augeri, Assistant Commissioner for Field Operations
Re: SNAP: Modifications to the Waiver of the Face-to-Face Interview

Overview

To improve customer service, increase efficiency and reduce the case processing burden for case managers, the Department recently requested USDA to modify the current waiver of the face-to-face interview to allow telephone interviews at *both* application and recertification without the need to document hardship. Previously, SNAP eligibility interviews could be conducted by telephone without documenting hardship at recertification only. At application, a face-to-face interview was still required, unless the case manager documented a hardship reason in the case record.

USDA has approved the Department's request and has modified the waiver. Now, under the modified waiver, case managers may conduct telephone interviews at *both application and recertification* without the need to document hardship in the case record.

Purpose of Memo

This memo:

- describes the terms of the modified waiver;
 - outlines case manager responsibilities for conducting telephone interviews; and
 - discusses BEACON changes to track interview type.
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- Terms of Waiver** Under the terms of the modified waiver, DTA may now conduct telephone interviews at both application and recertification with the following conditions:
- The same information must be requested during the telephone interview as is requested during a face-to-face interview, and the same verification processes and timelines must be followed regardless of the type of interview provided. Case managers must also continue to explain reporting requirements during the interview.
 - DTA must provide a face-to-face interview if a face-to-face interview is requested by the household or its authorized representative.
 - DTA must conduct a face-to-face interview if determined by the Department to be appropriate. Situations in which a face-to-face interview may be appropriate are described on page 3 of this memo.
 - A Notice of Missed Interview (NOMI) must be provided to the client if the telephone interview is missed, as required by federal policy.

Case Manager Responsibilities Effective November 9, 2009, a face-to-face interview is no longer required at application or at recertification. Also, case managers no longer need to determine or document a hardship reason to provide a client with a telephone interview. All SNAP application and recertification interviews should be conducted by telephone, if possible.

Case managers must continue to follow all procedures outlined in Field Operations Memo 2006-30: *FS (NPA and PA) Application Processing Guidelines*, with the exception of documenting hardship, when scheduling telephone interviews. Case managers must continue to schedule and conduct all interviews as soon as possible to ensure that:

- all applications are screened to determine if the client is eligible to receive expedited SNAP benefits;
- all information on the application is complete and accurate; and
- all verifications are requested and received within required case-processing time frames.

Case managers must continue to use the BEACON-generated Appointment Letter for a Telephone Interview when scheduling the telephone interview, and must send a Notice of Missed Interview (NOMI) if the telephone interview is missed.

**Case Manager
Responsibilities
(continued)**

Note: For active cases a manual NOMI must be sent, as currently a BEACON-generated NOMI can only be created from a pending case.

A face-to-face interview should be scheduled at the TAO, however, if any of the following conditions exists:

- A face-to-face interview is requested by the household or its authorized representative;
- The information provided on the application or recertification form or during the interview is questionable, contradictory, or incomplete and the case manager is unable to resolve the issue satisfactorily by telephone;
- The client does not have access to a telephone; or
- The case is coded as a heightened level of security case (see Field Operations Memo 2008-23 for more information).

Limited English Proficiency is *not* an appropriate reason for requiring a client to have a face-to-face interview rather than a telephone interview. To comply with federal law, the Department is required to advise clients of the right to professional interpreter services and must provide interpreter services to clients whose primary language is not English or who use American Sign Language (ASL), regardless of language, national origin or noncitizen status. Interpreter services must be provided to clients with Limited English Proficiency (LEP) and ASL users at the first point of contact. Interpreter services, and/or the QWEST Tele-language line, should be used when language barriers exist. See Field Operations Memo 2008-16, *Department Interpreter Services Enhancements*, for more information.

If a client is hard of hearing or hearing impaired, has a cognitive impairment or has any other difficulty with phone communication, a face-to-face interview may still not be necessary. The case manager should use TTY lines when the client indicates he or she is hard of hearing or hearing impaired (see Field Operations Memo 2008-16, *Department Interpreter Services Enhancements*, for more information).

The case manager should also provide the client with an opportunity to have an authorized representative participate in the telephone interview. Nevertheless, if a client informs the case manager that he or she is more comfortable with a face-to-face interview or for any reason prefers to see a case manager in person, the case manager must provide a face-to-face interview.

**BEACON
Tracking and
Reporting**

BEACON Increment 2.1.26, effective November 9, 2009, added fields needed to track households affected by the waiver, as required by USDA. The following fields have been added to the Update Tab on the *Interview Wrap-up EBC Results* window:

- Interview Method; and
- Interview Date.

Interview Method has five new field entries:

- Telephone Interview;
- Face-to Face Interview;
- Interview Waived;
- Interview Scheduled/Canceled; and
- Denial–No Interview.

When wrapping up a case in EBC Results after an interview has been conducted to :

- approve an application;
- reinstate a case with a reevaluation;
- process a reevaluation; or
- deny or close a case, with a reason such as *Fail to submit the required verifications*,

select the Method of Interview (*Telephone Interview* or *Face-to-Face Interview*), and enter the date the interview took place.

When wrapping up a case in EBC Results to deny or close a case, and an interview has not been conducted, for example:

- failure to complete the application process where a scheduled interview was missed and a NOMI was sent;
- administrative closure; or
- whereabouts unknown;

select *Denial-No Interview* from the Interview Method dropdown list.

Note: *Interview Waived* and *Interview Scheduled/Canceled* must be used **only** with certain elderly or disabled households with no earned income who meet the criteria to have the interview waived. Refer to Field Operations Memo 2009-64A for more information.

Obsolete Memo

Field Operations Memo 2009-63, *SNAP: Modifications to the Face-to-Face Waiver*, is now obsolete.

Questions

If you have any questions, please have your Hotline designee call the Policy Hotline.
