



Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Transitional Assistance
600 Washington Street • Boston, MA 02111

JANE SWIFT
Governor

ROBERT P. GITTENS
Secretary

JOHN A. WAGNER
Commissioner

Field Operations Memo 2002-16
July 15, 2002

To: Transitional Assistance Office Staff

From: *AD* Cescia Derderian, Assistant Commissioner for Field Operations

Re: Waiving In-Office Face-to-Face Interviews for NPA FS AUs

Overview

In an ongoing effort to expand access to food stamp benefits, USDA has clarified that more waivers of the in-office face-to-face interview should be given to applicants and recipients. An in-office face-to-face interview is an interview conducted at a TAO. AU Managers must inform applicants and recipients of their right to request a waiver of the in-office face-to-face interview. Applicants and recipients who have a hardship reason automatically qualify for a waiver of the in-office face-to-face interview (see below for the definition of hardship). AU Managers are encouraged to waive in-office face-to-face interviews whenever possible. Thus, **all NPA FS AUs** must be reviewed during the (re)application or recertification process to determine if a waiver of the in-office face-to-face interview is appropriate.

A telephonic interview or home visit remains a requirement if the in-office face-to-face interview is waived. The primary method AU Managers should use when waiving the in-office face-to-face interview is a telephone interview followed by the applicant or recipient mailing in all necessary documents and verifications. Home visits should be granted only when the applicant or recipient does not have an authorized representative and is unable to complete the (re)application or recertification process by either telephone or mail. However, an in-office face-to-face interview must be provided if the applicant or recipient requests one.

Definition of Hardship

Hardship conditions include, but are not limited to: illness and other health concerns; being the primary caregiver of a household member; transportation costs or other transportation difficulties; prolonged severe weather; or work hours which preclude a face-to-face interview.

Elderly and disabled applicants or recipients who do not have an authorized representative continue to qualify for a face-to-face interview waiver.

For more information on hardship conditions see 106 CMR 361.510.

Determination of Hardship

AU Managers have some discretion in determining whether or not an applicant or recipient's claim of hardship qualifies for a face-to-face interview waiver. AU Managers, however, must **not** require a face-to-face interview if it would result in the applicant or recipient not completing the (re)application or recertification process. The applicant or recipient does not have the right to appeal the denial of a waiver of the face-to-face interview unless the individual is seeking a waiver as a reasonable accommodation. For more information on providing reasonable accommodations see *A User's Guide: Transitional Assistance Programs and BEACON, Chapter IV, Section A, page 2*.

Waivers of Face-to-Face Interview

Recipients who request a waiver of the face-to-face interview should have their request approved unless there is a compelling programmatic reason not to approve the waiver. The following are a few examples. It would not be appropriate to grant an ABAWD recipient a waiver of the face-to-face interview because an interview is necessary to ensure continued compliance with work requirements. It would be appropriate in most instances to approve a face-to-face interview waiver of the annual in-office interview for an AU subject to Universal Quarterly Reporting. However, if a recipient has not been accurate and timely in returning quarterly reports, a face-to-face interview would be appropriate to discuss the importance of filing accurate and timely quarterly reports.

Documenting Requests for a Face-to-Face Interview Waiver

AU Managers must document in BEACON that the applicant or recipient has been granted or denied a waiver of the face-to-face interview as well as the reason why the waiver was requested. **All requests and subsequent decisions must be recorded in the Narrative Tab of the Eligibility Explorer Window.** An example of how to document approval of a waiver would be, "Sally Smith was granted a waiver of the face-to-face interview because she works nights and baby-sits during the day."

Processing Applications and Recertifications Without a Face-to-Face Interview

AU Managers must process (re)applications and recertifications completed without a face-to-face interview the same way an (re)application or recertification is taken during a face-to-face interview. AU Managers must ensure that during the (re)application or recertification process, all relevant information is entered on BEACON and that all information provided to an applicant or recipient during a face-to-face interview is sent to the AU's current mailing address.

Note: AU Managers must remember to screen for food stamp categorical eligibility. See *A User's Guide: Transitional Assistance Programs and BEACON, Chapter IX, pages 8-10.*

For more information on processing Requests for Assistance, (re)applications and recertifications as well as what information the AU Manager must provide to the applicant or recipient must be provided, see *A User's Guide: Transitional Assistance Programs and BEACON, Chapter IV, Sections A, B and C.* AU Managers must inform applicants and recipients to return all necessary verifications and documents requiring the applicant or recipient's signature within Department timeframes. AU Managers are still responsible for offering to help applicants and recipients and must inform them to call if they have difficulty getting the required verifications.

Applicants and recipients who complete the (re)application or recertification process and require an EBT card are eligible to receive Valid-Without-Photo Mass EBT Cards and/or PIN numbers by mail. For more information on how to issue a Valid-Without-Photo Mass EBT Card and/or PIN number by mail, see *A User's Guide: Transitional Assistance Programs and BEACON, Chapter XVI, Section C, pages 8-14.*

Additional Examples of Face-to-Face Interview Waivers

Example 1: An individual living in Boston applies for food stamp benefits. She works nights so the AU Manager assumes she can come to the TAO during the Department's normal business hours. She indicates, however, that during the day she is either sleeping or caring for her five-year-old niece. This is a situation where it *seems* the applicant could come to the TAO, however, the AU Manager decides she does have a valid hardship reason and approves a waiver of the face-to-face interview. The application is then taken telephonically and the AU Manager sends all relevant program information to the individual's mailing address. This waiver continues as long as the individual's employment situation remains unchanged.

**Additional
Examples of
Face-to-Face
Interview
Waivers
(continued)**

Example 2: A recipient had an appointment on Monday to recertify for food stamp benefits but canceled due to the heavy rain and because his vehicle does not start when it is raining. He reschedules for Tuesday but the rain still prevents him from driving to the TAO. The recipient asks for a waiver of the face-to-face interview due to the bad weather. The AU Manager could suggest scheduling the interview for Wednesday, but to meet the recertification timeframes, the AU Manager decides the interview can be done telephonically and grants the recipient a waiver of the face-to-face interview. This waiver was approved for one recertification period and the recipient would have to request another waiver if he does not want to come to the TAO for his next recertification period.

Questions

If you have any questions, please have your Hotline designee call the Policy Hotline at 617-348-8478.
