

Operations Memorandum - Food Stamp OPS060502

5/25/06

SUBJECT: Waiver of Face-to-Face Interview at Application for the Food Stamp Program
TO: Executive Directors
FROM: Joanne Glover, Director, Bureau of Operations

Purpose

To provide County Assistance Offices (CAOs) with guidance in defining hardship to waive the face-to-face interview at application for the Food Stamp Program (FSP).

This policy is effective May 26, 2006

Background/Discussion

7 CFR §273.2(e)(2) provides that the state agency may waive the face-to-face interview in favor of a telephone interview at application for the FSP when the household requests the waiver because of a hardship situation. The Department of Public Welfare asked the Food and Nutrition Service (FNS) if any state received a waiver of the face-to-face interview for all FS applications regardless of hardship. FNS stated that no such waiver has been granted because of the risk of quality control errors. FNS advised that states could broadly define household hardships.

The current guidance for defining hardship is based upon circumstances as outlined in [OPS030310](#) and in Food Stamp Handbook (FSH) Section [504.41](#). CAOs are directed to broaden the definition of hardship as indicated below. Regulations still require that the CAO must document in the case file to show when a waiver is granted because of a hardship.

Old Policy for waiving face-to-face interviews due to hardship:

Hardship conditions include, but are not limited to:

- Illness;
- Care of a household member;
- Prolonged severe weather; or
- Working or training hours which prevent the household from participating in an in-office interview.

New Policy for waiving face-to-face interviews for hardship:

Hardship conditions include, but are not limited to:

- Illness;
- Care of a household member;
- Child under age 6;
- Severe weather;
- Employed or enrolled in training;
- Residence located more than 20 minutes (by car or walking) from the CAO;
- No public transportation available;
- The household would incur child care or transportation expenses;
- Limited English Proficiency issues.

The household may describe a hardship to the CAO when setting up an application interview. The CAO should offer a telephone interview for what appears to be a household hardship.

DOCUMENT circumstances that create hardship in file.

Regulations provide that the applicant household must be notified that they may request a telephone interview if coming into the office for a face-to-face interview will cause a hardship. Changes to the application packet are under review to incorporate this provision.

Example: An application is brought into the CAO. The expedited review is completed. When the CAO schedules the household for the face-to-face interview, the household declares they do not have the bus fare to come into the CAO for the interview. The CAO should offer a telephone interview.

CAOs will continue to waive the face-to-face interview in favor of a telephone interview for households in which all members of the household are elderly or disabled and have no earned income. Also, if a Community-Based Organization assists this type of household to complete and file a FS application and provides all required verification, the CAO is not required to interview the household.

CAOs will also continue to waive the face-to-face interview in favor of a telephone interview for all FS renewals (See [OPS-060104](#)).

Next Steps

1. Share this information with all appropriate staff.
2. This Operations Memorandum will become obsolete when the information is incorporated into the Food Stamp Handbook.

3. Direct questions regarding this Operations Memorandum to your Area Manager.