

Operations Memorandum - Food Stamps

OPS070214

2/23/07

SUBJECT: Notice of Missed Interview
TO: Executive Directors
FROM: Joanne Glover, Director, Bureau of Operations

Purpose

To inform County Assistance Offices (CAOs) of the requirement to notify a food stamp (FS) household that they missed a scheduled face-to-face or telephone interview and that the household is responsible for rescheduling the interview.

This policy is effective March 12, 2007.

Background/Discussion

Federal regulations at 7 CFR 273.2(h)(1)(i)(D) state: "For households that have failed to appear for an interview, the state agency must notify the household that it missed the scheduled interview and that the household is responsible for rescheduling a missed interview. If the household contacts the state agency within the 30 day processing period, the state agency must schedule a second interview. The state agency may not deny a household's application prior to the 30 th day after application if the household fails to appear for the first scheduled interview."

Federal regulations at 7 CFR 273.14(b)(3)(iii) state: "... If the household misses its scheduled interview, the State agency shall send the household a Notice of Missed Interview ..."

The Food and Nutrition Service (FNS) notified states through Quality Control Policy Memo #06-04, dated May 30, 2006, that if the state agency denies an application and fails to send a Notice of Missed Interview (NOMI), the decision to deny the application is invalid. Because this policy was never very clear, FNS gave states until October 1, 2006 to begin reviewing all negative denials.

DPW and other states challenged this interpretation since some states were granted waivers to accommodate a walk-in policy that did not require sending a NOMI.

It was DPW's understanding that FNS was delaying implementation of the quality control determinations of negative actions and the use of the NOMI pending re-examination of the policy. FNS notified DPW that there were no plans to re-examine NOMI policy and negative errors will be taken if an application is denied for a missed interview and a NOMI was not sent.

OLD POLICY

Application

A household must keep a face to face or telephone interview when applying for FS benefits. If the household does not appear for the application interview or does not contact the CAO by the 30 th day following the application filing date, the CAO will send a Notice of Ineligibility.

Renewal

A household must keep a face-to-face or telephone interview when FS benefits are due for renewal. The household is sent a PA 10 SP, an appointment notice and an application for renewal. If the household does not appear or telephone for the renewal interview or does not contact the CAO, the CAO will send a confirming notice telling the household that FS benefits have been closed because the certification period expired.

NEW POLICY

Application

If an application interview is missed, the CAO must send a contact letter to notify the household that they missed their interview and that it is their responsibility to contact the CAO to set up another interview or the application will be denied.

- Suggested wording on the contact notice is:

“You did not keep your interview appointment for food stamp benefits on _____. It is your obligation to call and ask for another interview no later than _____. If you fail to keep an interview appointment, your application will be denied.”

- If a notice of missed interview is not sent by the CAO, the denial action will be invalid and a quality control error may occur. If the CAO discovers the notice of missed interview was not mailed, the worker will follow the directions in Food Stamp Handbook Section 504.62, Delays Caused by the County Assistance Office.

NOTE: Based on 7 CFR 273.2(e)(3), the CAO must schedule a specific date and time to interview all applicant households who are not interviewed on the day they submit their applications. This requirement would apply to individuals who either mail the application to the CAO or submit the application electronically through COMPASS. CAOs that have a walk-in interview policy for applicants may permit households to walk-in or telephone any time prior to their scheduled appointment.

The CAO will document the notice of missed interview mailing by:

- Noting in the case narrative that the interview was missed and a notice was mailed; and
- Including a copy of the notice of missed interview in the case record.

Renewal

If a renewal interview is missed, the CAO must send a contact letter to notify the household that they missed their interview and it is their responsibility to contact the CAO to schedule another interview.

- Suggested wording on the contact notice is:

“You did not keep your renewal appointment for food stamp benefits on _____. It is your obligation to call and ask for another interview no later than _____. If you fail to keep an interview appointment, your food stamps will close because the certification period will expire.”

Next Steps

1. Share this information with all appropriate staff.
2. Direct questions regarding this policy to your Area Manager.
3. Maintain this Operations Memorandum until the appropriate handbook pages have been revised.