

DATE: April 3, 2023

OPERATIONS MEMORANDUM #23-04-02

SUBJECT: Temporary Changes to the Supplemental Nutrition Assistance Program (SNAP) due to the ending of the Public Health Emergency

TO: Executive Directors

FROM: Tanoa Fagan
Director
Bureau of Operations

PURPOSE

To inform County Assistance Offices (CAOs) about temporary changes to SNAP due to allowable administrative waivers. These changes are effective April 1, 2023, and will remain in effect through March 31, 2024 for two of the waivers and March 31, 2025 for the remaining waiver.

BACKGROUND/DISCUSSION

The Food and Nutrition Service (FNS) has approved waiver requests submitted by the Department of Human Services to waive certain requirements for SNAP. These waivers allow Pennsylvania to:

- Waive the requirements that an interview be completed before issuing Expedited SNAP (EXFS), ongoing SNAP at application, or at renewal.
- Provide alternate procedures when a change of address is reported.
- Waive the audio recording requirements for a telephonic signature.

Waive Interview at Initial and/or Recertification Application – This waiver is effective until March 31, 2024.

During this waived period, caseworkers should attempt contact with the client to gather more information if there is information that needs to be verified. If contact to clarify unclear information is unsuccessful, the caseworker should pend for that information. Caseworkers should follow verification guidance in SNAP Handbook chapters:

- At application – SNAP Handbook section 578.32
- At renewal – SNAP Handbook section 578.34

NOTE: Caseworkers should not be sending the Notice of Missed Interview (NOMI) or failing any cases 047 – Failure to Interview, for applications during this time. To avoid a system generated NOMI, caseworkers should indicate that the SNAP interview has been completed during case processing.

Instructions for processing SNAP benefits with waived interviews:

Application – Eligible for EXFS, pending ongoing

1. Process the case normally, marking the interview question on the Program Request Questions screen as 'yes'.
2. Continue through the case, pending for required information.
3. Issue EXFS, pend ongoing.
4. Process ongoing benefits when required information is received.
5. On the SNAP Budget Authorization screen enter Interview Code 'Application Interview Waived'.
6. Before submitting, in case comments, enter 'The interview for this application has been waived per FNS waiver.'

Application – Eligible for EXFS and ongoing OR Ineligible for EXFS and able to process ongoing – same workflow

1. Process the case normally, marking the interview question on the Program Request Questions screen as 'yes'.
2. On the SNAP Budget Authorization screen enter Interview Code 'Application Interview Waived'.
3. Before submitting, in case comments, enter 'The interview for this application has been waived per FNS waiver.'

Application – Ineligible for EXFS, pending ongoing

1. Process the case normally, marking the interview question on the Program Request Questions screen as 'yes'.
2. Continue through the case, pending for required information.
3. Stop and unlock case on SNAP Budget Authorization.
4. Process ongoing benefits when required information is received.
5. On the SNAP Budget Authorization screen enter Interview Code 'Application Interview Waived'.
6. Before submitting, in case comments, enter "The interview for this application has been waived per FNS waiver"

Renewal – All information received case ready to process

1. Process the case normally.
2. On the SNAP Budget Authorization screen enter Interview Code 'Reapplication Interview Waived'.

3. Before submitting, in case comments, enter 'The interview for this renewal has been waived per FNS waiver.'

Renewal – Pending for information

1. Process the case normally, pending for required information.
2. Stop on Eligibility screen and unlock the case.
3. Finish processing when required information is received.
4. On the SNAP Budget Authorization screen, enter Interview Code 'Reapplication Interview Waived'.
5. Before submitting, in case comments, enter 'The interview for this renewal has been waived per FNS waiver.'

Alternate Procedures When Change of Address is Reported – This waiver is effective until March 31, 2024.

When a change of address is reported during the certification period, but no verification of updated shelter and utility expenses is received, the CAO must send a request for contact asking the household to report any changes in their shelter and utility expenses. If the household responds with the updated shelter costs, the case should be updated with the new information. If the household does not respond to the request, the CAO should leave the shelter and utility expenses on the case and review them at the next Semi-Annual Report (SAR) or Renewal, whichever is sooner. If the household provides the updated shelter and utility expenses at any time, the CAO must update the case.

Waive the Telephonic Interview Audio Recording – This waiver is effective until March 31, 2025.

This waiver allows the CAO to collect a telephonic signature verbally without the requirement to create and store an audio recording of the client's attestation. If a client submits an application or renewal without completed questions or their signature, the CAO can receive a client's verbal attestation of this information, including the client's signature, over the phone. The CAO will document the verbal attestation in the case narrative to show that the client verbally has signed the application, renewal, or SAR. The narrative should state the following:

"[Client's name] has verbally signed the application or renewal and verbally attested to the following information..."

The CAO needs to provide applicants and recipients a copy of any information to which they are verbally attesting. If the household failed to sign the application entirely, and the household is verbally attesting to information on the application or renewal that was not originally on the form, the CAO will need to send the client a copy of the completed application, allowing the client the opportunity to correct any errors or omissions. If the only thing pending is the client's signature on the Rights and

Responsibilities page of the application or renewal, the CAO will need to ensure the client is sent a copy of their Rights and Responsibilities.

NEXT STEPS

1. Share and review this information with appropriate staff members.
2. Direct questions regarding this Operations Memorandum to your Area Manager.
3. This Operations Memorandum is in effect until March 31, 2025.