DHS Oregon Department of Human Services

Children, Adults and Families

Information Memorandum Transmittal

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Food Stamps and Program Integrity

Authorized Signature

Number: SS-IM-06-019
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Topic: Food Benefits

Subject: In-person Interview Waiver Guidelines

Applies to (check all that apply):

- ☐ All DHS employees
- ☒ Area Agencies on Aging
- ☒ Children, Adults and Families
- ☐ County DD Program Managers
- ☐ County Mental Health Directors
- ☐ Health Services
- ☒ Seniors and People with Disabilities
- ☐ Other (please specify):

Message:

Federal food stamp regulations and state administrative rules require that an eligibility interview be conducted with every application for FS certification and recertification. **At no time is the state allowed to certify or recertify without an interview**. An interview is a conversation between a worker and the client. It reviews all eligibility factors and resolves inconsistencies. Workers use the information gained in the interview, on the application and from the verifications to reach the eligibility determination and accurate benefit level. Interviews may be conducted over the telephone or in-person (face-to-face in office or in a home visit). Federal regulations and State administrative rules also indicate that there are times when the required once every 12-month in-person interview can be waived and replaced with a telephone interview.

The intent of this transmittal is to discuss when and how to replace the 12-month in-person interview with a telephone interview. As each case comes due for recertification, workers should review their cases for a possible in-person interview waiver. The following are guidelines for replacing the in-person interview at recertification with a telephone interview.

The policy on interviews is located in FS B.8 and 461-115-0230.

There are several different circumstances listed in policy on when the in-person interview can be waived at recertification. Each reason indicates an added hardship to the filing group if they are required to come to the local office to reapply for benefits.

The listed circumstances are:

Circumstance	Narration
Work or training hours, which requires a member to take time off work or school to attend the in-office interview. This includes higher education students.	“FTF waived for work hours”
The adults are elderly or have disabilities, which make it difficult to come to the office.	“FTF waived for elderly/disability”
Care of a household member (This includes children or any members with disabilities.)	“FTF waived for care of member”
Transportation difficulties	“FTF waived for transportation”
Illness of a household member	“FTF waived for illness”
Safety issues due to domestic violence	“FTF waived for DV”
Other issues. (The local area may identify other hardship issues and narrate the hardship.)	“FTF waived due to (name other issue)”

Narration:
Always narrate the reason the in-office interview is waived. The narrative does not need to be detailed. Use the recommended language above, without going into detail. This should be narrated in the template under “TYPE OF INTERVIEW (FTF, PHONE, HV).

Expedited Service:
Offer the telephone interview at recertification when the household meets expedited service criteria. All FS applications for recertification must be reviewed for expedited services when the filing date is after a break in benefits. Cases meeting expedited criteria must have the interview along with eligibility determination and benefits issuance within 7 calendar days of the filing date.

Homeless Clients:
Homeless clients must be interviewed either in-office interview **<u>or</u>** by telephone. There are three choices: the client can come in for an interview; provide the worker with a phone number for contact to conduct the interview; or call the worker on a certain date for the interview. The final decision here may depend on the client and local office practices. If unable to contact the client, send a pending notice (DHS 210 or SDS 539H) to pend for an interview. We recommend the local office develop procedures to facilitate homeless client applications. Possibly develop procedures to ask the homeless client to immediately complete the application and be interviewed the day they pick-up the application in the office.

Which household members can be interviewed?
The person interviewed may be the head of household, spouse, any other responsible adult of the filing group, or an authorized representative.

Interviewing the client and confidentiality:
Phone interviewing may feel different from interviewing the client in-person. In the beginning ask a few identifying questions to confirm the person on the phone is the client. For the interview, ask open questions about household composition, income and costs. Cover all eligibility factors, clarify and resolve all inconsistencies. Review the reporting requirements and ensure the client understands what they are to report. Verification of identity is only needed at recert if it is a new head of household. All interviews must be conducted protecting the client's right to privacy and confidentiality.

How many attempts to contact client by phone before sending a pending notice asking for the interview? Narrate each time you make an attempt to contact the client by telephone. Include if you left a message on voice mail or a recorder. It is recommended that you make <u>at least</u> two attempts before sending the pending notice. Make each attempt at least 4 hours apart, maybe AM and PM. If the client has not provided a phone number or after two attempts to reach the client, send the pending notice notifying the client of the requirement to have an interview. If at all possible, send the pending notice so that the client has at least 14 days before the end of the 30-day application processing period. This allows time to schedule, complete the interview, obtain any necessary verification and make the eligibility determination.

Example: Client is working and the certification is expiring 9/30. The client completes and turns in the application on 9/5. 9/5 is the filing date and starts the 30-day application processing period for this recertification. The worker attempts to call the client on 9/8 in the AM and on 9/9 in the PM. The pending notice is sent to the client on 9/9 asking they call on (date) for the required interview. Also, it is a good idea to indicate how long the interview will take (e.g., approximately 15 to 20 minutes).

Scheduling Telephone interviews: All interviews must be scheduled so the household has at least 10 days to provide needed verifications before the end of the 30-day processing period.

If the client is difficult to reach and they call the office, the office needs to be prepared to interview the client at that point and not require they call back.

What happens if the client is not interviewed? The application process is incomplete without the interview. Remember to do the notification of missed interview. See SS-PT-06-019 for the notification options and policy. On the 30th day following the filing date, the FS case must be denied for no interview. (Reason code IT)

Client's right to an in-office FTF appointment: The Department must grant an in-office interview anytime the client makes the request. A phone interview cannot be forced on a client.

OFSET mandatory cases: Offices have an option of having the client come to the office for the interview when they are OFSET mandatory and must do their annual participation or conduct the telephone interview. During a telephone interview, the worker must explain the requirements and send forms or notices. If there is a contractor, the worker may send the notice writer notice (FS7832R) to inform the mandatory person of the scheduled appointment with the contractor.

Examples of waived in-person interviews:

1. Client has two young children (ages 4 and 5). It is difficult for her to come to the office with them and it is difficult to find someone to provide care for them while the client comes to the office. Waive the in-office interview.
2. Client is 65 and has mobility issues. It is difficult for him to come to the office for the interview. Waive the in-office interview.
3. Client is employed and working 30 hours a week. It is difficult to come to the office for the interview due to the work schedule. Waive the in-office interview.

Local/Branch Action Required: Local offices should review Section B.8 in the FS manual and these guidelines with all staff that are involved with FS recertifications. They should also establish procedures that ensure good and timely client access to the eligibility interview for recertification.

Central Office Action Required: Revise the computer-generated notice regarding recertification coming due to incorporate phone interviews.

If you have any questions about this information, contact:

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