

U.S. HUNGER SOLUTIONS

Best Practices for Implementing the Telephone Interview to Reduce SNAP Client and Administrative Burdens

SCOPE State

PROGRAM Supplemental Nutrition Assistance Program (SNAP)

PRACTICE

Pursuant to the U.S. Department of Agriculture (USDA) final rule, effective March 7, 2017, state agencies may use a telephone interview for SNAP applicants at initial application and recertification, unless the client requests a face-to-face interview.

WHY

Phone interviews result in less red tape for clients and state agencies, which means SNAP applications are more efficiently processed, but without adverse impacts on SNAP payment accuracy rates.

According to a <u>U.S. Government</u> Accountability Office (GAO) study, ⁱ

SNAP officials and community partners found that phone interviews are particularly helpful for the elderly and working families because they:

- reduce transportation hassles;
- eliminate barriers for applicants who cannot get to an office due to child care, work responsibilities, or mobility issues; and

remove the stigma of visiting a public assistance office.

Agencies benefit because they can:

reduce administrative costs;

decrease traffic flow in offices, which frees up staff to cover extended service hours and call centers; and

interview more applicants, and with fewer schedule disruptions caused by no-shows.

By cutting down on the number of noshows, states can improve their record of acting on new and recertified applications in a timely manner under federal rules.

BACKGROUND

Previously, in order to provide an applicant with a telephone interview in lieu of a faceto-face interview at initial application or recertification, state agencies had to document client hardship or obtain a waiver from USDA Food and Nutrition Service. As of 2010, all 50 states and Washington, D.C., had obtained waivers. With the 2017 change, USDA rules now allow state agencies to use a telephone interview without the need for the state to ascertain hardship or obtain a USDA waiver.

If a state agency decides to conduct telephone interviews in lieu of face-to-face interviews, they must specify this in their SNAP state plan of operation and describe the type of households that will be routinely offered a telephone interview. Applicants still must be provided with the option of a face-to-face interview. State agencies that do not opt to make telephone interviews generally available must still provide the option for a telephone interview to applicants who meet the hardship criteria. In both instances, state agencies must provide Limited English Proficient (LEP) households with bilingual personnel during the interview.

SPOTLIGHT

California now requires all counties to offer phone interviews, a practice supported by the Western Center on Law and Poverty, California Food Policy Advocates (CFPA), and other anti-hunger groups. CFPA hosts a website, <u>The 411 on Phone Interviews in</u> <u>California</u>, ⁱⁱ as a resource for SNAP administrators, program analysts, and advocates across California implementing the waiver of the face-to-face interview. The "411" website includes sample documents, frequently asked questions, myths and facts, and county and community resources on phone interview policy.

TIP

Check out <u>USDA's SNAP Workload</u> <u>Management Matrix</u> ⁱⁱⁱ for information on advantages and considerations for state implementation of SNAP telephone interviews. For information on which states use call centers for a variety of SNAP eligibility functions, see <u>USDA's SNAP</u> <u>State Options Report</u>. ^{iv}

KEY STEPS

Check the status of your state's interview policy outlined in its SNAP state plan of operation to determine the parameters of the use of telephone interviews in lieu of face-to-face interviews.

To operationalize the adoption of phone interviews, efforts should focus on:

■ working with states to implement telephone interviews effectively, including training eligibility workers and educating applicants about their option to have telephone interviews rather than face-toface interviews;

advising potential applicants on how they can schedule and prepare for telephone interviews; and

■ building on lessons learned in other states regarding use of telephonic signatures to complete interviews for those applying by telephone, and tools to remind applicants about their scheduled calls, such as by automated calls, texts, features on apps, and online web portals that allow households to view their case information online.

CHALLENGES

Applicants do not always receive clear information of the date and time of their phone interview;

- Applicants may not recognize the phone number placing the call and fail to pick up;
- Local SNAP offices do not always confirm contact information or applicants' preferred timeframes to be reached; and
- Local SNAP offices can be hard to reach (e.g., phone lines are busy, calls are dropped, voicemail boxes are full, or hold times are prohibitively long).

All of these can lead to households missing out on benefits.

LESSONS

Supply caseworkers with special training and equipment;

Ensure that phone lines are functioning

properly and can handle the volume of calls;

Establish and communicate clear qualitycontrol policies so that, regardless of how the interview is conducted, the same information and verification process is used;

 Give applicants clear instructions for phone interviews;

Offer interpreters for households with limited English proficiency and offer appropriate communications technology for persons with disabilities (e.g., video relay service);

■ Guarantee a face-to-face interview for households who request one; some households may lack a phone or prefer to share sensitive information in person;

Monitor implementation, including analyzing case approvals and denials to identify any problematic trends;

■ Create call/contact centers to receive a high volume of calls and offer a range of services (e.g., office location, office hours) to more complex information (e.g., intake and change reporting);

Encourage call/contact centers to offer "on-demand" interviews, which is when an applicant can set their own appointment, thus increasing efficiency, reducing call wait times, and providing the client with scheduling flexibility;

Provide sufficient staffing to handle prescheduled and "on-demand" interviews; and

Implement telephonic signatures so that those applying or recertifying by telephone can complete the interview at that time.

MORE RESOURCES

■ Telephone Interviews at Initial Certification and Recertification §§ 273.2(e)(2) and 273.14(b)(3): Final Rule as Reported in <u>1/6/17 Federal Register</u>; ^v and

Office operations and application

processing <u>7 CFR § 273.2 (e)(2)</u> and Recertification <u>7 CFR § 273.14(b)(3)</u>. vi

Find out information for your state on phone interviews:

■ USDA's <u>SNAP Workload Management</u> <u>Matrix</u> ^{vii} has information on which states have call/contact centers, and which states offer phone interviews and on-demand interviews. Information is updated every few years;

USDA's <u>SNAP State Options Report</u>; viii

■ USDA's <u>Questions & Answers</u> <u>Concerning SNAP: Eligibility,</u> <u>Certification, and Employment and</u> <u>Training Provisions of the Food,</u> <u>Conservation and Energy Act of 2008</u> <u>Final Rule - Set # 1 Memo</u>; ^{ix} and

Alliance to Transform CalFresh's <u>Telephonic Signature in California</u> <u>Counties</u>. ×

RESOURCES TO MAKE YOUR CASE

FRAC's <u>SNAP webpage;</u>

CFPA webpage, *The 411 on Phone*

Interviews in California; xi and

■ USDA's <u>Call Center/Contact Center</u> <u>Support for States: A Framework and</u> <u>Reference Guide</u>. ^{xii}

For technical assistance, contact:

Food Research & Action Center (FRAC) 1200 18th Street, NW Suite 400 Washington, DC 20036 202.986.2200 http://frac.org/

For more on ending hunger, read FRAC's <u>A</u> Plan of Action to End Hunger in America.

ENDNOTES

¹ U.S. Government Accountability Office. (2007). Food Stamp Program: Use of Alternative Methods to Apply for and Maintain Benefits Could be Enhanced by Additional Evaluation and Information on Promising Practices. Available at: https://www.gao.gov/assets/270/260290.pdf. Accessed on

https://www.gao.gov/assets/270/260290.pdf. Accessed on May, 10, 2019.

ⁱⁱ California Food Policy Advocates. (n.d.). *The 411 on Phone Interviews*. Available at: *https://cfpa.net/phone-interviews/*. Accessed on May, 10, 2019.

^{III} U.S. Department of Agriculture, Food and Nutrition Service. (2013). Supplemental Nutrition Assistance Program Workload Management Matrix. Available at:

https://www.fns.usda.gov/snap/snap-workloadmanagement-matrix. Accessed on May, 10, 2019.

^w U.S. Department of Agriculture, Food and Nutrition Service. (2018). *State Options Report*. Available at: <u>https://www.fns.usda.gov/snap/state-options-report</u>. Accessed on May, 10, 2019.

^v U.S. Department of Agriculture, Food and Nutrition Service. (2017). Supplemental Nutrition Assistance Program (SNAP): Eligibility, Certification, and Employment and Training Provisions of the Food, Conservation and Energy Act of 2008. Available at: <u>https://www.govinfo.gov/content/pkg/FR-2017-01-</u> 06/pdf/2016-30663.pdf. Accessed on May, 10, 2019.

^{vi} United States Government. (2017). 7 *CFR* § 273.2 (e)(2) -Office operations and application processing. Available at: <u>https://www.law.cornell.edu/cfr/text/7/273.2</u> and 7 *CFR* § 273.14(b)(3) - Recertification. Available at:

https://www.law.cornell.edu/cfr/text/7/273.14. Accessed on May, 10, 2019.

^{vii} U.S. Department of Agriculture, Food and Nutrition Service. (2013). SNAP Workload Management Matrix. Available at: <u>https://fns-prod.azureedge.net/sites/default/files/matrix.pdf</u>. Accessed on May, 10, 2019.

^{viii} U.S. Department of Agriculture, Food and Nutrition Service. (2018). State Options Report. Available at: <u>https://www.fns.usda.gov/snap/state-options-report</u>. Accessed on May, 10, 2019.

¹⁴ U.S. Department of Agriculture, Food and Nutrition Service. (2017). Questions & Answers Concerning SNAP: Eligibility, Certification, and Employment and Training Provisions of the Food, Conservation and Energy Act of 2008 Final Rule - Set # 1. Available at: <u>https://fnsprod.azureedge.net/sites/default/files/snap/SNAP_Elig_C</u>

ert ET Rule QA Set 1.pdf. Accessed on May, 10, 2019. * Alliance to Transform CalFresh, County Welfare Directors

Association of California. (2016). *Telephonic Signature in California Counties*. Available at:

<u>http://transformcalfresh.org/wp-</u> <u>content/uploads/2016/05/Telephonic-Signature-in-</u> <u>California-Counties-Survey-Results-2016-1.pdf</u>. Accessed on May, 10, 2019.

^{xi} California Food Policy Advocates. (n.d.). *The 411 on Phone Interviews*. Available at: <u>https://cfpa.net/phone-interviews/</u>. Accessed on May, 10, 2019.

^{xii} U.S. Department of Agriculture, Food and Nutrition Service. (2011). Call Center/Contact Center Support for States - A Framework and Reference Guide. Available at: <u>http://www.fns.usda.gov/sites/default/files/call_center.pd</u> <u>f</u>. Accessed on May, 10, 2019.