



Food and Nutrition
Service

1320 Braddock Place
Alexandria, VA
22314

September 1, 2020

Amber Gillum
Deputy State Director
Office of Economic Services
Department of Social Services
P.O. Box 1520
Columbia, SC 29202

RE: SNAP – South Carolina Request to Adjust Requirement to Offer a Face-to-Face Interview – Initial – Approval

Dear Ms. Gillum:

This letter transmits the approval of the South Carolina Department of Social Services (DSS) request to adjust Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.2(e)(2)(i). Under this adjustment (COV-199), South Carolina can adjust the requirement for State agencies to grant a face-to-face interview to any household that requests one at application or recertification.

The Food and Nutrition Service (FNS) is approving this adjustment in response to the COVID-19 pandemic, under authorization of the Families First Coronavirus Response Act (P.L. 116-127).

FNS is approving this adjustment for a period of 1 month, effective September 1, 2020, through September 30, 2020. The approval is contingent upon the State agency's compliance with the adjustment conditions and data reporting components in item 10 and 11 of Enclosure 1. The detailed adjustment response is enclosed.

FNS is responding rapidly to the COVID-19 pandemic with multiple waivers and flexibilities in its programs. The Families First Coronavirus Response Act requires the Food and Nutrition Service to collect specific data elements from States. The CARES Act provides funding, for which FNS will collect information in order to distribute funding. Please prepare the necessary data elements to collect and submit this data as described in this document. The public will be given the opportunity to comment on this data collection, including legislatively-mandated data collection through a future information collection process being submitted to the Office of Management and Budget.

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If you have questions or need additional information regarding this adjustment, please contact your respective Regional office representative.

Sincerely,

Sasha Gersten-Paal
Program Development Division
Supplemental Nutrition Assistance Program

Enclosure

Enclosure 1

**POSTPONE EXPEDITED SERVICE INTERVIEW ADJUSTMENT
RESPONSE**

- 1. Adjustment serial number:** COV-199
- 2. Type of request:** Initial
- 3. Regulatory citation:** 7 CFR 273.2(e)(2)(i)
- 4. State:** South Carolina
- 5. Region:** SERO
- 6. Regulatory requirements:** Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.2(e)(2)(i) require that the State agency grant a face-to-face interview to any household that requests one at application or recertification, in lieu of a telephonic interview.
- 7. Description of alternative procedures:** The State agency may require households to complete a telephonic interview during application and recertification. The State agency will use its existing on-demand interview procedures to allow clients to complete an unscheduled interview by phone. If requested, the State agency will schedule an interview to be conducted by phone.
- 8. Action and reason for approval or denial:** The Food and Nutrition Service (FNS) recognizes the need for State agency measures for effective and efficient program management. FNS is approving this request for 1 month, effective September 1, 2020, through September 30, 2020.
- 9. Legislative basis for action:** Approval is based on the Families First Coronavirus Response Act (P.L. 116-127), which allows FNS to approve adjustments that would result in a more effective and efficient administration of the program.
- 10. Conditions and reasons:** Approval is contingent upon the following conditions. The State agency must:
 - Inform clients that the State agency will schedule the interview, if requested;
 - Screen all applications for expedited service and instruct households found eligible for expedited service to complete the interview within 7 days from the date of application. The State will also be required to cold call households eligible for expedited service to attempt an interview. Nothing in this adjustment approval will absolve the State from meeting the expedited service

processing standards in 7 CFR 273.2(i) that require benefits to be made available to eligible households by the seventh calendar day after their application;

- Provide households with clear, written instructions for completing the interview and the date by which the household should complete the interview requirement (calendar day);
- Provide households eligible for expedited service that do not complete their interview by the 7th day after application, a Notice of Missed Interview (NOMI);
- Provide households not eligible for expedited service that do not complete their interview by the 10th day after application, a NOMI;
- Repeat instructions for completing the interview in the NOMI and inform applicants of the date on which their application will be denied or benefits terminated if the interview is not completed;
- Ensure that recipient households that are sent a NOMI during recertification and are subsequently denied have until the end of their certification period to complete the interview without having to submit a new application form;
- Ensure that sufficient administrative and automation controls are in place so the terms of this adjustment are implemented efficiently. Phone system performance including dropped calls, wait times, call completion times, and staff adequacy must be monitored and adjusted to adequately serve incoming calls; and
- Ensure that the adjustment does not negatively impact program access or customer service.

11. Evaluation Data Requirements: The State agency must provide to FNS the data and analysis listed below required for evaluation of this waiver.

- Estimated number of households impacted by this adjustment
- A narrative on the effect of program access and client satisfaction, including an analysis of any client or advocate complaints received related to the waived procedure;
- A narrative on the effect of providing timely and accurate benefits; and
- A narrative on the effect of any other aspects of the eligibility process including the ability to manage staff caseload growth and the impact on administrative efficiency.

12. Expiration date: September 30, 2020.

13. Limitation, if any, on approval: Approval of this adjustment is limited to the State SNAP agency.

14. Quality control procedures: No special Quality Control (QC) procedures are required for cases subject to the provisions of this adjustment. Cases should be reviewed using standard review procedures contained in the FNS

Handbook 310.

15. Anticipated implementation date (*notify FNS if actual date differs*):
upon receipt of this approval.