



Department of Human Services  
311 West Saratoga Street  
Baltimore MD 21201

## ACTION TRANSMITTAL

Control Number: # 24-25

Effective Date: Immediately

Issuance Date: December 6, 2023

**TO: DIRECTORS, LOCAL DEPARTMENTS OF SOCIAL SERVICES DEPUTY/ASSISTANT DIRECTORS FOR FAMILY INVESTMENT, FAMILY INVESTMENT SUPERVISORS AND ELIGIBILITY STAFF**

**FROM: AUGUSTIN NTABAGANYIMANA, FIA ACTING EXECUTIVE DIRECTOR**

**RE: INTERVIEW WAIVER**

**PROGRAM AFFECTED: SNAP AND CASH PROGRAMS**

**ORIGINATING OFFICE: OFFICE OF PROGRAMS**

### **SUMMARY**

On October 19, 2023, Food and Nutrition Services (FNS) approved Maryland Department of Human Services (DHS) Family Investment Administration's (FIA) request to waive the interview requirements at initial application and recertification. This waiver was granted to enable Maryland to mitigate the challenges of meeting SNAP Federal requirements due to the end of the public health emergency. The implementation of this waiver is conditioned up on ensuring that identity and all mandatory verifications are completed pursuant to 7 CFR 273.2(f). The case manager must contact the customer if his or her identity is not verified. The case manager may also contact the customer to follow up on unclear or missing information. This waiver is effective October 1, 2023 through May 31, 2024, and may not be extended.

Maryland has elected to align the interview waiver with SNAP and CASH programs. Application and redetermination eligibility case processing will remain the same. Applications and redeterminations **will not** be denied or closed **solely for failure to complete an interview**. However, the interview waiver is contingent upon **the receipt of all mandatory verifications** needed to meet program eligibility requirements.

**Note:** Contact and/or an interview may be necessary in order to obtain and/or meet the mandatory eligibility verification requirements for SNAP and CASH programs.

## REQUIREMENTS

1. This waiver is effective October 1, 2023 through May 31, 2024. The household must file an initial application or submit a recertification application.
2. The Agency is not required to complete an interview under this waiver. However, if the household requests an interview, the interview must be granted.
3. All eligibility requirements must be verified through available sources including collateral contact. Therefore, clearances must be run, reviewed, and E&E updated accordingly.
4. The Agency must contact the household if information supplied by the household or an authorized representative is questionable, or the information cannot be verified through the clearances.

## REMINDER

**If any of the following requirements apply, at application or redetermination, contact and/or an interview with the customer and/or authorized representative may be necessary.**

1. This is not a redetermination waiver. Therefore, households are required to submit their redetermination packet as usual.
2. Screening for SNAP for exemptions from general work requirements and ABAWD are still required. This includes referral to appropriate SNAP E&T programs.
3. If you contact households with a member(s) subject to mandatory Employment and Training requirements during application or recertification, you must offer an oral explanation of work requirements.
4. Screening for TCA work requirements is still required. This includes engaging customers in an appropriate work activity, tracking, and updating the WORKS system, sanctioning for non-compliance, etc.
5. TCA Child Support and SATS are still required.
6. TCA assessment, creation and modification of FIP is still required.
7. 60 - month TCA hardship exemption assessment is still required.
8. TDAP screening for disability is still required.

## **POLICY AND PROCEDURAL UPDATES**

Under this waiver, Maryland will not be required to interview a household at initial application and recertification, provided that the State agency completes all mandatory verifications in [7 CFR 273.2\(f\)](#). **Application and redetermination processing will remain the same with the exception that they will not be denied or closed for failure to complete an interview.**

### **Requested Interview Procedure**

**Note:** Interviews are not required. However, there may be instances where an interview is warranted and may need to be scheduled. System automated appointment scheduling will be disabled in the Eligibility & Enrollment (E&E) system.

Pursuant to [7 CFR 273.2](#), as outlined above, the State agency **must** grant an interview to any household that requests one.

\*As a best practice, the case manager should accommodate the household by accepting their preferred method of communication to include a telephonic interview.

Case managers **must**:

- Manually schedule an appointment at the household's request.
- Manually mail out an appointment letter to the household within established timeframes.
- Upload the appointment letter in E&E under **Case Documents** as **Correspondence-Appointment Letters**, and
- narrate the case regarding the scheduled appointment date & time as well as the request for an interview, *i.e., In-person or Phone*.

**Note:** No Notice of Missed Interview (NOMI) should be mailed.

### **Redetermination packets will go out as mail-in**

All Redetermination packets mailed through May 31, 2024 will go out as Mail-in.

## **QUALITY CONTROL**

There is a possibility that quality control errors may go up with the implementation of the interview waiver. Therefore, it is critically important that the following actions are taken to improve payment accuracy:

1. Ensure that clearances are accessed, reviewed, uploaded, and updated in E&E on every case.
2. Contact the household to clarify any information that is missing, contradictory, or questionable. Narrate clearly to justify the reason for the contact.
3. Increase the volume of cases pre-reviewed to ensure accuracy and proper handling.

**Attachments:**

SNAP Policy Manual Section 406: Normal Processing

SNAP Policy Manual Section 408: Verification

TCA Policy Manual Section 201: TCA Application Process

TDAP Policy Manual Section 201: Application & Interview

19-05-AT-Unclear-Information

20-07-AT 60 Month TCA Policy

23-01 Policy Alert: Confirming CSA & Substance Use Disorder Compliance At Application

24-17-AT ABAWD Time Limits 36 Month Period Waived Jurisdictions & Fiscal Responsibility Combined

**INQUIRIES:**

Please direct policy questions to FIA Policy by completing the [FIA Policy Information Request Form](#) found on Knowledge Base or via email at [fia.policy@maryland.gov](mailto:fia.policy@maryland.gov) for Montgomery County only. For system questions, please email [fia.bsdm@ma](mailto:fia.bsdm@ma) .

cc: DHS Executive Staff  
FIA Management Staff  
MDH Executive Staff  
DHS Help Desk  
Constituent Services  
Office of Administrative Hearings