

ROY COOPER • Governor

MANDY COHEN, MD, MPH • Secretary

SUSAN OSBORNE • Assistant Secretary for County Operations for Human

Date: December 21, 2021

## **Dear County Directors of Social Services**

**Attention:** Food and Nutrition Services (FNS) Managers and Supervisors

**Subject:** FNS Recertification Period Extension (Revised)

**Priority:** Information and Action

A waiver that allowed for the automatic extension of six-month certification period cases has been in effect since May 2020 to promote social distancing and ease the burden on North Carolina families as well as eligibility staff. On December 18, 2021 the United States Department of Agriculture (USDA) provided updated guidance on the continuation of this waiver.

USDA has clarified that automated certification extensions completed January 1, 2022 or later may only be applied to six-month certification period FNS households that have not previously been extended. This means that any six-month certification period FNS case that has already been auto extended cannot be auto extended again. North Carolina has requested and been approved to continue auto extensions for any six-month certification cases with certification periods ending in January, February, and March 2022 that have not previously been auto extended. The following policy will be effective January 1, 2022.

# I. Six-month Certification Period Cases Eligible for Auto Extension.

- A. Cases eligible for auto extension must meet the following guidelines:
  - FNS cases certified for six-month certification periods; and
  - Certification period ending during the months of January, February, or March 2022; and
  - The FNS case has not been auto extended since completion of last application or regular recertification.
- B. Procedures for six-month certification period cases eligible for auto extension:
  - The DSS-2435 will be suppressed and will not be mailed to the FNS household.
  - NC FAST will automatically extend the certification for another six-month period of time. This extension includes recertifications that are, in-progress, on-hold, or not started.
    - Benefits for cases on-hold will not be released until the county reviews the case and releases the hold. The county must send a manual DSS-8551, Notice

of Eligibility, Denial or Pending Status when the hold is removed to provide the FNS household adequate notice of the certification extension.

- Ensure that case workers are reviewing their on-hold decisions. Supervisors and Lead Workers can view their workers on-hold decisions to ensure tasks are being completed timely. If assistance is needed, you may refer to the "Viewing On-Hold Decisions-Supervisors & Lead Workers" job aid.
- All cases, except on-hold cases, that are automatically extended will receive a one-time approval notice (DSS-8551) as well as a one-time Change Report Form (DSS-8550). The one-time notices will not be available in NC FAST.
- NC FAST will indicate that an interview is required and the appropriate DSS-2435 will be issued at the next recertification.

### II. Six-month Certification Period Cases Ineligible for Auto Extension:

Any six-month certification period case that has previously received an auto extension since their last application or regular recertification is ineligible to be auto extended again.

Any six-month certification period case that has previously received an auto extension will be coded in NC FAST and the DSS-2435 generated will indicate that an interview is required prior to recertification. Because requiring an interview on all six-month certification cases due for a recertification would be an administrative burden on county staff, USDA has allowed states to implement an exit strategy that assures 50% or more of the six-month extended certification cases that are due for recertification in each month has an interview completed.

- A. To meet the USDA requirement of completing 50% of the interviews for six-month certification cases North Carolina plans to take a simplified approach. The following procedures will be applied on all six-month certification cases that are not eligible for auto extension and the certification period ends in the months of January, February, March, April, May, and June 2022:
  - NC FAST will select and mail DSS-2435 to all households that are not eligible for auto extension per policy in FNS 505.02 System Selection of Cases Due for Recertification.

**NOTE**: Due to the late receipt of this new clarification, DSS-2435s due for the month of January 2022 will be delayed. It is expected that the forms will be mailed no later than the last workday of December 2021.

- 2. The household must complete and return the DSS-2435 meeting the policy requirements in FNS 505.03 Filed and Unfiled Recertifications.
- 3. DSS-2435s received where the **Product Delivery Case (PDC) ends in an odd number**:

Any County DSS P.O. Box 2334 Anytown, NC 22222



Case Identifier: 123456789 Worker: Jane DoAll Date Generated: 12/20/2021 Due Date: 01/15/2022

Any County DSS P.O. Box 2334 Anytown, NC 22222 Johnny John 100 Main Street Anytown, NC 22222

North Carolina Department of Health and Human Services
Division of Social Services (DSS)
Food and Nutrition Services (FNS) Notice of Expiration and Interview Recertification Form

Please tell us if you need assistance because you do not speak English or have a disability. Free language assistance and/or other aids and services are available upon request. To receive free interpreter services, call 1-866-719-0141 or call your local DSS office at 704-487-0661. After the recorded message, you will reach an operator who can provide you with an interpreter. If you have a disability and need communication assistance, call 1-866-719-0141 or Relay Services: 711.

- These cases will be required to complete an interview as is indicated on their DSS-2435. Follow policy instructions in FNS 505.07 Recertification Interviews.
- The waiver of Interview requirements does not apply to these recertifications. All other waivers in effect at the time of processing the recertification may apply.
- When processed, these cases should be coded in NC FAST as due a mailin only recertification at the end of their next certification period.
- 4. DSS-2435s received that the **Product Delivery Case (PDC) ends in an even number:**

Any County DSS P.O. Box 2334 Anytown, NC 22222

Case Identifier: 0123456 8 Worker: Jane DoAll Date Generated: 12/20/2021 Due Date: 01/15/2022

Any County DSS P.O. Box 2334 Anytown, NC 22222 Johnny John 100 Main Street Anytown, NC 22222

North Carolina Department of Health and Human Services
Division of Social Services (DSS)
Food and Nutrition Services (FNS) Notice of Expiration and Interview Recertification Form

Please tell us if you need assistance because you do not speak English or have a disability. Free language assistance and/or other aids and services are available upon request. To receive free interpreter services, call 1-866-719-0141 or call your local DSS office at 704-487-0661. After the recorded message, you will reach an operator who can provide you with an interpreter. If you have a disability and need communication assistance, call 1-866-719-0141 or Relay Services: 711.

 These cases will not be required to complete an interview even though it is indicated on their DSS-2435. Follow policy instructions in FNS 510 SR Recertifications Procedures to complete recertification based on timeliness of receipt.

• When processed, these cases should be coded as due an interview at the end of their next certification period.

**Note:** These cases are not required to complete an interview however, if the worker has contact with the household for other reasons, an interview may be completed at that time. Code in NC FAST to indicate an interview is not required at the end of the next certification period.

5. Effective July 2022, all normal recertification policies listed in FNS 505 SR Recertification Requirements and FNS 510 SR Recertifications Procedures will apply.

## B. Reports:

- NC FAST Help will make a report of all cases that are auto extended available each month in NC FAST Help.
- This simplified approach removes the need for any additional reports as any
  existing reports may be used and this simplified approach easily applied to
  determine which six-month recertification cases require an interview during
  each month.

#### III. Effective Date:

Carle & a Vest

This policy is effective January 1, 2022 for all six-month certification cases with certification periods ending January 31, 2022 or later. Please submit any questions regarding this information to the DHHS Operational Support Team (OST) at DSS.Policy.Questions@dhhs.nc.gov.

Sincerely,

Carla West, Senior Director for Economic Security

Division of Social Services, Economic and Family Services Section

CLW/rc

EFS-FNS- 100-2021