

ROY COOPER • Governor KODY H. KINSLEY • Secretary

**YVONNE COPELAND •** Director, Division of Child and Family Well Being

**Date:** July 6, 2023

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

- Attention: Food and Nutrition Services (FNS) Income Maintenance Caseworkers, Managers and Supervisors
- Subject:Revised Temporary Administrative Waivers to Support Unwinding from the COVID-19<br/>Public Health Emergency (PHE)
- Priority: Information and Action

## I. GENERAL INFORMATION

To further support county departments of social services (DSS) agencies and Food and Nutrition Services (FNS) applicants/recipients, the North Carolina Department of Health and Human Services (NCDHHS) requested approval to continue offering two temporary administrative waivers to support unwinding from the COVID-19 Public Health Emergency (PHE). The United States Department of Agriculture (USDA) approved the continuance of the following waivers:

1. **Waiving the certification interview** for 11 months, beginning July 1, 2023 and ending May 31, 2024.

Some interviews may be waived at initial application or recertification, providing that the applicant's identity has been verified and all other mandatory verifications in  $\frac{7 \text{ CFR}}{273.2(f)(1)}$  have been completed. Caseworkers must contact the household if any information on the application or recertification is questionable, or if verification is incomplete.

FNS interviews are an essential step for determining eligibility for the program. Interviews are an opportunity for DSS agencies to ensure the forms are completed, clarify information reported on applications or recertification forms, collect verification documents, and answer client questions. Therefore, some applicants/recipients who submit their application and recertification form will need an interview.

NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • DIVISION OF CHILD AND FAMILY WELL-BEING

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As you are aware, NCDHHS has required interviews for 50% of cases, starting January 1, 2022. Refer to DCDL, <u>FNS Recertification Period Extension (Revised) - Information and Action</u> for more information.

2. Allowing alternative methods for recording telephonic signatures for 12 months, beginning July 1, 2023 and ending on June 30, 2024. This waiver allows for recording telephonic signatures through means other than creating an audio recording of the client's verbal attestation as required by <u>7 CFR 273.2(c)(7)(viii)</u>.

# II. POLICY PROCEDURE

## A. Waiving interviews for applications and recertification:

The approved waiver to waive the certification interviews applies to applications and recertifications.:

Refer to policy instructions in <u>FNS 420 Normal Application Processing</u> and <u>FNS 510 SR</u> <u>Recertifications Procedures</u> to complete applications and recertifications based on timeliness of receipt.

- 1. Applicants who submit an application whose last digit of their social security number is an even number or zero, may **not** require an interview. Under certain circumstances, caseworkers will need to conduct an interview for applications whose last digit of the social security number is even, if:
  - i. The application form is not complete
  - ii. Information is questionable or
  - iii. Mandatory verification is incomplete (the Notice of Information Needed to Complete your Food and Nutrition Services (FNS), DSS-8650 is required to be sent for mandatory verifications without scheduling an interview and if provided then the interview can be waived).
- Recipients who submit the Food and Nutrition Services (FNS) Notice of Expiration Recertification Form, DSS-2435, whose last digit of their Case Identifier number which is the Product Delivery Case (PDC) (see example below) ends with an even number, may not require an interview. Under certain circumstances, caseworkers will need to conduct an interview for recertifications whose last digit of the Case Identifier number is even, if:
  - i. The recertification form is not complete
  - ii. Information is questionable or
  - iii. Mandatory verification is incomplete

While these cases may not be required to complete an interview, 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.



## B. Interviews MUST be completed for the following applications and/or recertifications:

Refer to policy instructions in <u>FNS 415 Interviewing</u>, <u>FNS 420 Normal Application Processing</u>, and <u>FNS 505.07 Recertification Interviews</u>.

- 1. All applicants who submit an application whose last digit of the social security number is an **odd** number, **MUST** be interviewed.
- 2. "Recipients who submit the DSS 2435 and the case identifier number which is the PDC ends with an odd number, **MUST** have an interview completed."



#### C. Allowing alternative methods for recording telephonic signatures:

Telephonic signature grants additional flexibility that permitted caseworkers to document in writing in the case file that a client verbally attested to the information provided on the application, instead of requiring an audio recording of the verbal attestation to constitute a valid telephonic signature required by <u>7 CFR 273.2(c)(7)(viii)</u>.

Caseworkers **must** document the verbal attestation in NC FAST and provide the client a written copy of the application if requested. Provide the client a written copy of the completed application. While these cases may not be required to complete an interview, in order to correct errors or omissions the caseworker will need to contact the applicant/recipient by telephone and/or DSS-8650 to complete the application or recertification form.

Refer to Dear County Director Letter EFS-FNSEP-44-2021 for complete guidance (<u>https://files.nc.gov/ncdhhs/documents/files/dss/dcdl/economicservices/EFS-FNSEP-44-2021.pdf</u>).

## III. IMPLEMENTATION INSTRUCTIONS

This policy is effective July 1, 2023. If you have any questions, please submit them to the Continuous Quality Improvement Team (CQI) <u>dss.policy.questions@dhhs.nc.gov</u>.

Sincerely,

Madhu Vulimini

**Madhu Vulimiri, MPP** Deputy Director Division of Child and Family Well-Being

MV/vb

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