

ANDREW M. CUOMO Governor MICHAEL P. HEIN Commissioner BARBARA C. GUINN
Executive Deputy Commissioner

General Information System (GIS) Message

Section 1	
Transmittal:	20 TA/DC026 Upstate and New York City
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То:	Subscribers
Suggested Distribution:	Commissioners, Temporary Assistance (TA) Directors, and Supplemental Nutrition Assistance Program (SNAP) Directors
From:	Jeffrey Gaskell, Deputy Commissioner Employment and Income Support Programs
Subject:	COVID-19 SNAP Interview Requirements
Effective Date:	Immediately
Contact Information:	SNAP Questions – SNAP Bureau 518-473-1469 otda.sm.cees.snap@otda.ny.gov

Section 2

This GIS supersedes and replaces <u>GIS TA/DC022</u>, dated March 31, 2020. As referenced in <u>GIS TA/DC022</u>, OTDA had requested and on April 1, 2020, received further clarification from USDA regarding adjustments to interview requirements, particularly as they apply to applications eligible for expedited processing, during the COVID-19 public health emergency.

The purpose of this GIS is to advise social services districts (districts) that the United States Department of Agriculture, Food and Nutrition Service (FNS) has adjusted the interview requirements for the Supplemental Nutrition Assistance Program (SNAP). These adjustments will be in effect from the date of issuance of this GIS through May 31, 2020.

Interviews at Initial Application and Recertification

Districts will not be required to interview a household at initial application or recertification, provided that **both** of the following conditions have been met:

- the applicant's identity has been verified; and,
- all other mandatory information and verification has been provided and is valid.

If either of these conditions has **not** been met, then an interview will be required according to regular interview policy and processes. Districts will be required to interview the household if any of the information or verification submitted is unclear or cannot be verified through separate verified-upon-receipt data matches. Every attempt shall be made to verify household circumstances through data matching and information currently present in the State and district systems.

Initial Applications Eligible for Expedited Processing

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As districts are aware, for applications eligible for expedited processing, the only information that must be verified prior to the initial expedited issuance is the applicant's identity. (An applicant's identity can be verified via the SSN validation process in accordance with Section III.E.1 of 12-INF-06.) All other verification required and necessary to establish eligibility for ongoing benefits and to determine the ongoing benefit amount may be pended but must be provided prior to the issuance of ongoing SNAP benefits.

Until May 31, 2020, any applications for SNAP that are screened and found eligible for expedited processing, if the identity of the applicant has been verified, and if sufficient information for making a determination of eligibility and for calculating a benefit has been provided (verification of this information can be pended), the application may be processed and an expedited benefit issued without an interview being attempted or taking place. Please note that while interviews are not required, districts are not prohibited from completing interviews.

For cases in which expedited benefits have been issued without an interview and with pended verification, an interview is not required prior to issuing ongoing benefits if all required verification necessary to establish ongoing eligibility and determine an ongoing benefit amount has been submitted. In other words, when processing an application for **ongoing** SNAP benefits, if all mandatory verification has been submitted prior to the issuance of ongoing benefits, no interview is required.

Mandatory Verification

Federal regulation 7 CFR 237.2(f) requires the following information to be verified at application. SNAP policy guidance on the verification of the following mandatory eligibility factors has not changed in response to the COVID-19 public health emergency:

- 1. Identity
- 2. Social Security Number
- 3. Residency
- 4. Gross non-exempt income (earned and unearned)
- 5. Disability
- 6. Alien eligibility

Under **federal** rules, verification of other eligibility factors, such as household size and composition, shelter cost and utility expenses are only required if the information provided is questionable. (See Section III.D of <u>12-INF-06</u> for a definition of questionable information.)

Please see 12 INF-06 (http://otda.ny.gov/policy/directives/2012/INF/12-INF-06.pdf) for further information regarding SNAP verification policy.