General Information System (GIS) Message

Section 1

Transmittal: 20 TA/DC022
Upstate and New York City

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To: Subscribers

Suggested Distribution: Commissioners, Temporary Assistance (TA) Directors, and Supplemental Nutrition Assistance Program (SNAP) Directors

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Employment and Income Support Programs

Subject: COVID-19 SNAP Interview Requirements

Effective Date: Immediately

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- SNAP Questions – SNAP Bureau 518-473-1469 odta.sm.cees.snap@otda.ny.gov

Section 2

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) only through May 31, 2020 in response to the COVID-19 Public Health Crisis. FNS offered states three options for adjustment. States could implement any one of the adjustment options, any two of the adjustment options or all of the adjustment options.

Currently, OTDA is in discussions with FNS to get clarification of policy on the second and third options. However, we have informed FNS that New York State is implementing the first option, described below, immediately.

Please note that, as described in GIS 20 TA/DC019 (https://otda.ny.gov/policy/gis/2020/20DC019.pdf), certification periods for all SNAP cases with an April or May certification period end date have been extended for three months so that districts may focus on the processing, as timely as is possible, of new applications. Likewise, this policy is primarily designed to facilitate the processing of new applications for SNAP.

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 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.

**Expedited Processing**

The policy described immediately above also applies to applications eligible for expedited processing. No interview will be required as long as the applicant’s identity has been verified and all mandatory information and verification has been submitted.

If either of these conditions has not been met, then an interview will be required according to regular expedited interview policy and processes.

OTDA understands that few applications eligible for expedited processing are submitted with all required verification, so that the administrative relief provided by this temporary adjustment of policy is limited. OTDA and other states are pursuing further clarification and flexibility from FNS pertaining to the applications eligible for expedited processing.

**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 unsatisfactory.

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