



DATE: April 30, 2021

SUBJECT: Supplemental Nutrition Assistance Program (SNAP) - Quality Control (QC) System Resumes Nationwide July 2021: Expectations, Special Review Procedures and Optional Face-to-Face Interview Waiver

TO: All SNAP State Agencies
All Regions

Issuing Agency/Office:	FNS/SNAP
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Summary:	This memorandum provides guidance to State agencies regarding the resumption of regular QC operations in July 2021. It also provides information on special review procedures due to recent COVID-related legislation and provides States with a blanket waiver regarding the QC face-to-face interview.
Disclaimer:	The contents of this guidance document do not have the force and effect of law and are not meant to bind the public or FNS in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

Section 4603(a)(2) of the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L. 116-159), as amended by the Consolidated Appropriations Act, 2021 (P.L. 116-260) allowed State agencies to suspend QC sampling and reviews from June 1, 2020, through June 30, 2021. Beginning with the July 2021, sample month, State agencies are expected to resume regular SNAP QC operations.

This memo provides guidance regarding the resumption of regular QC operations¹. In addition, there are two attachments to this letter.

¹ QC operations are covered under the following approved OMB information collections: 0584-0074, 0584-0034, 0584-0299, and 0584-0303.

Attachment 1:

- Includes information on special review procedures specific to coding FNS form 380-1 regarding the temporary increase in SNAP benefits provided in the above referenced legislation and The American Rescue Plan Act of 2021 (P.L. 117-2).
- Provides details on how to implement the variance exclusion for the student eligibility provisions in P.L. 116-260.

Attachment 2:

- Includes information for requesting a blanket waiver to allow State agencies to conduct a telephone interviews in lieu of the face-to-face interviews for QC.

To prepare for a return to regular QC operations beginning with the July 2021, sample month, please review the following reminders and expectations:

Sampling and Review Process

- Cases must be sampled and reviewed in accordance with all governing laws, including but not limited to: Section 16(c) of the Food and Nutrition Act of 2008, as amended, and SNAP regulations at 7 CFR 275. Food and Nutrition Service (FNS) SNAP policy memos and handbooks, including the FNS Handbook 310 and FNS Handbook 311, provide clarification on these requirements
- State agencies must resume enforcement of penalties for households that refuse to cooperate with QC reviewers found in 7 CFR 275.12(g)(1)(ii).

Evaluations of QC Data

- Completion rates will be calculated for FY 2020 and FY 2021. FY 2020 will be based on five months of reviews (October 2019-February 2020) and FY 2021 will be based on three months of reviews (July-September 2021).
- State reporting monthly charts will resume when QC resumes. However, per the FNS guidance issued on February 19, 2021, no annual State or national payment error rates will be announced for FY 2020 or FY 2021.

Avoiding Bias

- State QC employees reassigned during the QC suspension to make eligibility determinations, are not permitted to conduct the QC review for any cases they performed eligibility actions on per regulations at 7 CFR 275.2(b).
- State QC must ensure any policy inquiries sent to State eligibility policy counterparts, to clarify the correct application of policies, do not include QC case-specific details.
- FNS is ready to provide technical assistance to State agencies as they seek to maintain operations and serve clients during the current public health emergency.

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State agencies with questions should contact their respective Regional Office representatives.

Ronald K. Ward
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Attachments

Attachment 1

Special Review Procedures Due to Recent Legislative Actions

Benefit Increase

- For the duration of the benefit increase provided by the Consolidated Appropriations Act, 2021 (CAA), QC must code the FNS form 380-1, item 9, with the allotment the household received in the sample month.
- Variances associated with the misapplication of the increased Thrifty Food Plan amount in the household budget are excluded from the error determination.
- Only variances associated with eligibility and the base allotment can be included in the QC error determination²

Student Eligibility

- The CAA temporarily modified eligibility standards for students enrolling in SNAP. These modified standards are in effect for initial SNAP applications until 30 days after the COVID-19 public health emergency is lifted, and until the first recertification of a household beginning no earlier than 30 days after the COVID-19 public health emergency is lifted. States were required to implement the temporary standards no later than January 16, 2021.
- FNS will allow a 120-day QC variance exclusion for any mistakes resulting from implementing the temporary standards for student eligibility. The variance exclusion begins on January 16, 2021, and ends on May 17, 2021. State agencies that implemented prior to January 16, 2021, will receive a variance exclusion for 120-days from the date of implementation.
- If the State implemented the temporary exemptions after January 16, 2021, it would only receive the variance exclusion from the State's date of implementation, until May 17, 2021.

² Questions and Answers - Consolidated Appropriations Act, 2021, published by FNS on February 19, 2021

Attachment 2

QC Face-to-Face Interview Waiver for July 2021-Dec 2021 Flexibility to Allow Telephone Interviews in Lieu of Face-to-Face Interviews for Quality Control Case Reviews

SNAP regulations at 7 CFR 275.12(c)(1) require State agencies to conduct face-to-face interviews for QC active case reviews at the participant's home, at an appropriate State agency certification office, or at a mutually agreed upon alternative location. FNS policy also permits States to conduct video conferencing interviews in lieu of face-to-face interviews and to conduct telephone interviews for households that received \$100 or less in benefits during the sample month.

Under the authority of 7 CFR 272.3(c)(1)(i), FNS may authorize temporary waivers to deviate from specific regulatory provisions when they cannot be implemented due to extraordinary temporary situations. State agencies have continued to report challenges in conducting face-to-face interviews for QC. Some State agencies continue to experience limited in-person capacity at local offices and continue to face challenges with contacting households and employers to verify circumstances. Additionally, the Centers for Disease Control and Prevention (CDC) recommends that all people, even those who have been vaccinated, stay six feet apart from those outside of their household, avoid crowds, and avoid poorly ventilated areas. It is difficult for many State agencies to adhere to such guidelines during face-to-face interviews given the constraints imposed by their office spaces and the precautions they must take to ensure participant privacy. By providing emergency relief of the face-to-face interview requirement through December 2021, FNS is providing States with the ability to safely conduct QC interviews in accordance with Federal, State, and local COVID-19 guidelines.

From July 1, 2021, through December 31, 2021, FNS will allow State agencies to suspend requirements at 7 CFR 275.12(c)(1) to conduct face-to-face interviews for QC active reviews. FNS is approving States to conduct telephone interviews in lieu of face-to-face interviews for all QC interviews conducted through December 31, 2021, regardless of the sample month.

Each QC case file must be documented to show the reason a face-to-face interview was not conducted and the FNS 380-1 must indicate a telephone interview was conducted. All other requirements specified in SNAP regulations at 7 CFR 275.12 remain in effect under this waiver, including penalties for household refusal to cooperate with a QC reviewer.

If a State elects to conduct QC interviews by telephone, the State must, prior to implementation, submit a waiver request through the [SNAP Waiver Information Management System \(WIMS\)](#). All waivers requested will end on December 31, 2021.

To submit, the State must fill in the following three fields on the “initial waiver request” screen in WIMS³ and then click “confirm”: (1) Type- *Admin*; (2) Title- *QC F2F Waiver July 2021-Sept 2021*; and (3) Requested Implementation Date- *Provide the MM/DD/YYYY the State intends to start implementing the waiver*.

³ WIMS and associated information collection is covered under OMB Package #0584-0083.