



Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE

October 2, 2024

Mr. Jeffrey W. Morley
Assistant Director
Division of Benefits and Medical Eligibility
Arizona Department of Economic Security
Post Office Box 6123, M/D 3111
Phoenix, Arizona 85005-6123

Dear Assistant Director Morley:

This letter transmits the approval of the Arizona Department of Economic Security's (DES) request to continue to waive Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.2(e)(3) and 273.14(b)(3)(iii). Under this waiver, DES can waive the interview scheduling requirements to provide on-demand, unscheduled telephone interviews at both initial application and recertification.

The Food and Nutrition Service (FNS) is approving this waiver for a period of four years, effective October 1, 2024, through September 30, 2028. The approval is contingent upon the State agency's compliance with the waiver conditions and data reporting components in items 9 and 10 detailed below.

Thank you for submitting the evaluation data associated with this waiver. FNS has concerns with the inconsistencies in the data report, four versions, accompanying the extension request. Specifically, the following data metrics are of concern:

- Average call wait time to begin interview exceeds 40 minutes
- The number of dropped calls due to inflated renewals, notice outage, several system outages and call center staff availability
- The number of applications denied for failure to complete the interview
- The number of recertifications denied for failure to complete the interview

FNS would like to remind the State agency that the data is essential towards understanding the success of the State's operation of the waiver. If the operation proves problematic, FNS may consider discontinuing the waiver.

If the State agency would like to extend this waiver, a waiver request must be submitted via the Waiver Information Management System 60 days (August 1, 2028) prior to the expiration date.

If you have questions or need additional information regarding this waiver, please contact your respective Regional Office representative.

Sincerely,

DocuSigned by:

FCBEAB537152496...

J. David Noble

Chief

Modernization and Integration Branch

Program Development Division

Supplemental Nutrition Assistance Program

CONDUCT UNSCHEDULED INTERVIEW (ON-DEMAND) WAIVER RESPONSE

1. **Type of request:** Extension
2. **Regulatory citation:** 7 CFR 273.2(e)(3) and 273.14(b)(3)(iii)
3. **State:** Arizona
4. **Region:** Southwest Regional Office (SWRO)
5. **Regulatory requirements:** Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.2(e)(3) require that the State agency schedule an interview for all applicants who are not interviewed on the date they apply for SNAP benefits. State agencies are required to promptly schedule appointments to allow the clients the opportunity to participate and to accommodate the needs of those with special circumstances, especially working households. The State agency must notify clients who miss their interview appointment that they are responsible for rescheduling it. If the household contacts the State agency within the 30-day application processing period, the State agency must schedule a second interview.

Regulations at 7 CFR 273.14(b)(3)(iii) require that State agencies schedule interviews so that the household has at least 10 days after the interview in which to provide verification before the certification period expires. If a household misses its scheduled interview, the State agency must send a Notice of Missed Interview (NOMI) (which may be combined with the notice of denial), and it must also schedule a second interview if the household requests it.

6. **Description of alternative procedures:** Instead of scheduling a specific date and time for the interview at the time of application, the State agency may provide unscheduled (on-demand) telephone interviews that allows applicants to complete the telephone interview at their convenience within a specified time.

State specific alternative procedures: The State agency will provide households the option to complete an interview at their convenience within 7 days (expedited) and 10 days (initial and recertification) from the date of their application, in lieu of scheduling a specific date and time.

When the applicant cannot complete the interview on the same day the agency receives the application, the State agency will send the household an Interview Appointment notice.

Initial Applications: The Interview Appointment notice advises the household of the following:

- Date by which the interview must be completed;
- Methods for completing the interview.

Methods of completing the interview:

- Telephonic: The household may complete their interview via telephone by calling between the hours of 7:00 AM and 6:00 PM Monday through Friday.
- In-Person: The household may complete a face-to-face interview by visiting the nearest Family Assistance Administration (FAA) office between the hours of 8:00 AM and 3:00 PM, Monday through Friday.

Households who contact the agency requesting a scheduled appointment will be scheduled an appointment for a specific date and time.

Households who do not complete an interview within the 10-day time frame will be sent a Notice of Missed Interview (NOMI). The NOMI informs the household that they missed their interview and to contact DES to complete the interview.

Households failing to complete the interview within 30 days of the application date will receive a denial notice. The denial notice informs the participant that they have until the 60th day from the application date to complete their interview without having to submit a new application.

Households who request e-communications through Email & Short Message Service (SMS) Text Messages will also receive all the following notifications:

- Application Received – sent one day after receipt of application
- Interview Due – sent four days after the interview notice is sent when the interview has not been completed
- Nutrition Assistance (NA) Denied – sent when NA is denied for failure to complete the application
Interview

Expedited Applications: All applications submitted are screened for potential eligibility for expedited services.

Households screened as potentially eligible for expedited services, who do not complete an interview on the same day, will be sent an Interview Appointment notice. The due date to complete the interview is seven days from the date of the application. When the seventh calendar day falls on a holiday, the household will be instructed to complete the interview by the workday prior to the seventh calendar day.

This will ensure that the household's benefits are available no later than the seventh day from the date of application per 7 CFR 273.2(i). If the household fails to contact the agency within the expedited timeframe, the household will lose its eligibility for expedited service and will have their application processed within the normal 30-day processing timeframe.

Households who do not complete an interview within the 7-day time frame indicated in the letter will be sent a Notice of Missed Interview (NOMI). The NOMI will inform the household that they missed their interview and to contact DES to complete the interview when they still wish to receive benefits.

Households failing to complete the interview within 30 days of the application date will receive a denial notice. The denial notice informs the participant that they have until the 60th day from the application date to complete their interview without submitting a new application.

Recertification Applications: All households receive a notice of expiration before the end of their certification period. The notice is sent at the beginning of the month before their last month of certification. When the household submits a recertification application, the Interview Appointment notice is sent to the household.

The Interview Appointment notice advises the household of the following:

- Date by which the interview must be completed; and
- Methods for completing the interview.

Methods of completing the interview:

- Telephonic: The household may complete their interview by calling all between the hours of 7:00 AM and 6:00 PM Monday through Friday.
- In-Person: The household may complete a face-to-face interview by visiting the nearest FAA office between the hours of 8:00 AM and 3:00 PM Monday through Friday.

Households who contact the agency requesting a scheduled appointment will be scheduled an appointment for a specific date and time.

Households who request e-communications through Email & SMS Text Messages will also receive the following notifications:

- Renewal Due – sent the first and third Friday of each month when the household has not submitted a renewal application
- Application Received – sent one day after receipt of application
- Interview Due – sent four days after the Interview notice is sent when the interview has not been completed
- Failed to Renew – sent when NA is closed for failure to renew, informing household to submit a renewal

- NA Closed – sent when NA is closed for failure to complete recertification Interview

Applicants who do not complete the interview within 10 days of the application date are issued a Notice of Missed Interview (NOMI) letter. The NOMI instructs recertification applicants they must call by the end of their certification period to complete an interview, or their case will be closed.

7. **Action and reason for approval or denial:** FNS recognizes the need for the State agency's measures for effective and efficient program management. FNS is approving this request for a period of four years, effective October 1, 2024, through September 30, 2028.
8. **Regulatory or legislative basis for action:** Approval is based on 7 CFR 72.3(c)(1)(ii), which allows FNS to approve waivers that would result in a more effective and efficient administration of the program.
9. **Conditions and reasons:** Approval is contingent upon the following conditions. the State agency must:
 - Inform households that the State agency will schedule the interview or provide a face-to-face interview if one is requested;
 - Screen all applications for expedited service and instruct households found eligible for expedited service to complete the interview within 5 days from the date of application. Nothing in this waiver approval will absolve the State agency from meeting the expedited service processing standards in 7 CFR 273.2(i) that require benefits to be made available to eligible households by the seventh calendar day after their application;
 - Provide households with clear, written instructions for completing the interview and the date by which the household should complete the interview requirement (calendar day);
 - Provide households that do not complete their interview within ten days after application a NOMI;
 - Repeat these instructions in the NOMI and inform applicants of the date on which their application will be denied, or benefits terminated if the interview is not completed;
 - Ensure that recipient households that are sent a NOMI during recertification and are subsequently denied have until the end of their certification period to complete the interview without having to submit a new application form;
 - Ensure that sufficient administrative and automation controls are in place, so the terms of this waiver are implemented efficiently. Phone system performance including dropped calls, wait times, call completion times, and staff adequacy must be monitored and adjusted to adequately serve incoming calls; and
 - Ensure that the waiver does not negatively impact program access or customer service.

- Comply with the following evaluation data reporting requirements and reporting schedule.

10. Evaluation Data Requirements and Reporting Schedule: The State agency must submit the following reports via WIMS using the appropriate data sheet. Templates are attached to the data report case in WIMS.

- Interim Report 1: Covers 18 Months After Implementation
 - Reporting Period: October 1, 2024 – March 31, 2026
 - Due Date: May 15, 2026
- Interim Report 2: Covers 36 Months After Implementation
 - Reporting Period: October 1, 2024 – September 30, 2027
 - Due Date: November 15, 2027
- Final Report with Extension request or Close Out Report: Covers 44/48 Months after Implementation
 - Final Report (if extending): Covers 44 Months After Implementation
 - Reporting Period: October 1, 2024 – May 31, 2028
 - Due Date: At extension, 60 days before waiver expires August 1, 2028
 - Close Out Report (if not extending): Covers Full 48 Months of Implementation
 - Reporting Period: October 1, 2024 – September 30, 2028
 - Due Date: 45 days after waiver expires November 15, 2028

The reports must include the following measures, which are explained in detail in the associated data sheet:

1. Average call wait time for interview (in minutes);
2. Number and percentage of all calls that result in a completed interview;
3. Average call completion time in minutes;
4. Number of dropped calls;
5. Number of requests for an in-person interview;
6. The number and percentage of NOMIs sent for failure to complete an application interview;
7. The number and percentage of NOMIs sent for failure to complete a recertification interview;
8. Number and percentage of applications denied for failure to complete the interview in 30 days;
9. Number of recertifications denied for failure to complete the interview in 30 days;
10. Number of applications filed;
11. Number of recertifications filed;
12. Number of applications interviewed on the first day.

11. Information required for extension: If the State agency wishes to extend the waiver beyond the approved length period, the State agency must provide FNS with a signed extension request and any required data, as outlined above in #9. FNS will not process an extension request until the State agency complies with the data requirements in their previous approval. FNS will consider an extension of this waiver based on the outcomes of the waiver and if the evaluation does not indicate a negative effect on program access or program integrity among the households subject to the waiver.

The State agency must submit waiver extension requests to the Regional Office 60 days prior to the expiration date, August 1, 2028.

12. Expiration date: September 30, 2028

13. Limitation, if any, on approval: Approval of this waiver is limited to Arizona's Department of Economic Security. The State agency is limited to the alternative procedures in this approval. The State agency must submit a modification request for FNS approval prior to making any changes to these approved procedures. The State agency must also notify FNS if it encounters issues or delays in implementation.

14. Quality control (QC) procedures: No special QC procedures are required for cases subject to the provisions of this waiver. Cases should be reviewed using the standard review procedures, modifying any eligibility requirements according to the terms and conditions of the waiver, and following the requirements for verification and documentation as contained in the FNS Handbook 310 to include documenting the QC review record with the certification waiver name or description and the period for which the applicable waiver was in effect, or when an approved waiver has been terminated or withdrawn as it pertains to the case under review.

15. Date of State agency's request: July 1, 2024

16. Date of regional office's transmittal of request to national office: July 8, 2024

17. Anticipated implementation date (*notify FNS if actual date differs*): October 1, 2024