



NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**

ROY COOPER • Governor

KODY H. KINSLEY • Secretary

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

Date: May 30, 2024

Dear County Directors of Social Services

Attention: Food and Nutrition Services (FNS) Income Maintenance Caseworkers, Managers and Supervisors

Subject: **Revised** Phaseout – Waive Interview at Recertification and Extension of Telephonic Signature Waiver

Priority: Information and Action

I. GENERAL INFORMATION

To further support county departments of social services (DSS) agencies and Food and Nutrition Services (FNS) applicants/beneficiaries, the North Carolina Department of Health and Human Services (NCDHHS) requested approval to phaseout the waiver which allows waiving Interviews at Recertification and also requested approval to extend the waiver for the Telephonic Signature. The United States Department of Agriculture (USDA) approved the continuance of the following waivers:

1. **Waiving the recertification interview** for four months, beginning June 1, 2024 and ending October 31, 2024.

Interview at Recertification is only waived for the beneficiaries who submit the DSS-2435, Food and Nutrition Services (FNS) Notice of Expiration and Recertification Form and the case identifier number/Product Delivery Case (PDC) ends with an **ODD** number. Caseworkers must contact the beneficiary if information provided on the recertification is questionable, or if verification is incomplete.

Effective June 1, 2024, Interviews will be required for ALL initial applications and reapplications. Refer to policy instructions in [FNS 415 Interviewing](#) and [FNS 420 Normal Application Processing](#)

FNS interviews are an essential step for determining eligibility for the FNS program. Interviews are an opportunity for DSS agencies to ensure the forms are completed,

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clarify information reported on applications, reapplications or recertification forms, collect verification documents, and answer client questions. NCDHHS' requirement to conduct interviews for 50% of cases for recertifications started January 1, 2022 and will continue until the Interview Waiver Phaseout - October 31, 2024. Refer to DCDL, [FNS Recertification Period Extension \(Revised\) - Information and Action](#) for more information.

	June 1, 2024 – October 31, 2024	November 1, 2024 onwards
Recertifications – odd number	Interview waived only if beneficiary submits DSS-2435, verification is complete, and no questionable information provided on recertification	Interview required
Recertifications – even number	Interview required	Interview required
Applications – all initial applications and reapplications	Interview required	Interview required

2. **Allowing alternative methods for recording telephonic signatures** for two years beginning July 1, 2024 and ending on June 30, 2026. This waiver allows for recording telephonic signatures through means other than creating an audio recording of the client's verbal attestation as required by 7 CFR 273.2(c)(7)(viii).

II. POLICY PROCEDURE


A. Waiving interviews for recertification:

The approved waiver to waive the interviews at recertification applies to recertifications based on the last digit of their Case Identifier number which is the Product Delivery Case (PDC) (see example below). If the case identifier number **ends with an ODD number**, that recert **may not require an interview**. Refer to policy instructions in [FNS 415 Interviewing](#) and [FNS 510 SR Recertifications Procedures](#).

1. Beneficiaries who submit the Food and Nutrition Services (FNS) Notice of Expiration Recertification Form, DSS-2435, caseworkers will need to conduct an interview for recertifications whose last digit of the Case Identifier number is **ODD**, if:
 - i. The recertification form is not complete
 - ii. Information is questionable or
 - iii. Mandatory verification is incomplete
 - iv. Cases that are certified for 12 months are still required to be interviewed.

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.

Any County DSS P.O. Box 2334 Anytown, NC 22222	
	Case Identifier: 123456789 Worker: Jane DoAll Date Generated: 12/20/2021 Due Date: 01/15/2022
Any County DSS P.O. Box 2334 Anytown, NC 22222	Johnny John 100 Main Street Anytown, NC 22222
North Carolina Department of Health and Human Services Division of Social Services (DSS) Food and Nutrition Services (FNS) Notice of Expiration and Interview Recertification Form	
Please tell us if you need assistance because you do not speak English or have a disability. Free language assistance and/or other aids and services are available upon request. To receive free interpreter services, call 1-866-719-0141 or call your local DSS office at 704-487-0661. After the recorded message, you will reach an operator who can provide you with an interpreter. If you have a disability and need communication assistance, call 1-866-719-0141 or Relay Services: 711.	

B. Interviews MUST be completed for the following recertifications:

Refer to policy instructions in [FNS 415 Interviewing](#), and [FNS 505.07 Recertification Interviews](#).

1. "Recipients who submit the DSS 2435 and the case identifier number, which is the Product Delivery Case ends with an **EVEN** number, **MUST** have an interview completed."

Any County DSS P.O. Box 2334 Anytown, NC 22222	
	Case Identifier: 012345678 Worker: Jane DoAll Date Generated: 12/20/2021 Due Date: 01/15/2022
Any County DSS P.O. Box 2334 Anytown, NC 22222	Johnny John 100 Main Street Anytown, NC 22222
North Carolina Department of Health and Human Services Division of Social Services (DSS) Food and Nutrition Services (FNS) Notice of Expiration and Interview Recertification Form	
Please tell us if you need assistance because you do not speak English or have a disability. Free language assistance and/or other aids and services are available upon request. To receive free interpreter services, call 1-866-719-0141 or call your local DSS office at 704-487-0661. After the recorded message, you will reach an operator who can provide you with an interpreter. If you have a disability and need communication assistance, call 1-866-719-0141 or Relay Services: 711.	

C. Allowing alternative methods for recording telephonic signatures:

Telephonic signature grants additional flexibility that permit 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 7 CFR 273.2(c)(7)(viii).

Caseworkers **must** document the verbal attestation in NC FAST and provide the client with a written copy of the application if requested. 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 (<https://files.nc.gov/ncdhhs/documents/files/dss/dcdl/economicservices/EFS-FNSEP-44-2021.pdf>).

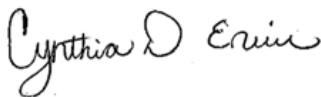
III. IMPLEMENTATION INSTRUCTIONS

The policy for **Waiving the recertification interview** is effective for four months, beginning June 1, 2024 through October 31, 2024.

The policy for **allowing alternative methods for recording telephonic signatures** is extended for two years beginning July 1, 2024 through June 30, 2026.

If you have any questions, please submit them to the Continuous Quality Improvement Team (CQI) dss.policy.questions@dhhs.nc.gov.

Sincerely



Cynthia Ervin, Assistant Director
Division of Child and Family Well-Being

CE/vb

EFS-FNSEP-XX-2024