



3 February 2025

<Submitted online>

Ms. Rachelle Ragland-Greene

Acting Department Information Collection Clearance Officer
Food and Nutrition Service
U.S. Department of Agriculture
Mail Stop 7602
Washington, DC 20250-7602

RE: Evaluating the Interview Requirement for SNAP Certification, FR 2024-31632

Dear Ms. Ragland-Greene,

The United Council on Welfare Fraud (UCOWF) is writing in response to Federal Register Notice 2024-31632 posted January 6, 2025, titled, “Evaluating the Interview Requirement for SNAP Certification.” We appreciate the opportunity to provide our perspective on this important matter. Past studies and practical experience have demonstrated that the interview process is critical to safeguarding program integrity and reducing improper payments. After a thorough review of the Notice and prior studies, we respectfully request that the Food and Nutrition Service (FNS) unconditionally withdraw the project.

For over 50 years, UCOWF has advocated for stronger policies, provided training and certification for investigation professionals, and fostered collaboration among state, county, and territorial agencies. As a 501(c)(3) nonprofit organization, UCOWF continues to ensure our nation’s critical public assistance programs are safeguarded and that taxpayer resources reach society’s vulnerable citizens while also connecting policymakers, fraud investigators, and key agency personnel to real world practices resulting in outcomes that reflect SNAP’s purpose and intent.

Federal regulations governing SNAP clearly require that an interview be conducted as an integral part of both the initial certification and recertification processes. Specifically, [7 C.F.R. § 273.2\(e\)](#) mandates that households complete a face-to-face interview with an eligibility worker at initial certification and at least once every 12 months thereafter. Likewise, [7 C.F.R. § 273.14\(b\)\(3\)](#) requires that an interview be conducted during the recertification process. These provisions were clearly and intentionally established to ensure that all information provided by applicants is verified and that any discrepancies are promptly addressed to prevent fraud and improper payment – both to the benefit of the applicant and the administration of the food-stamp program.

Given the clear statutory and regulatory requirements supporting the interview process—and the substantial evidence from prior studies demonstrating its importance in verifying applicant information and reducing the risk of improper payments—we urge FNS to reconsider any efforts to eliminate or diminish this critical safeguard. The integrity of the SNAP program depends on maintaining robust verification procedures, and the interview is an essential element of these procedures. UCOWF finds the timing of this study unusual

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given the unprecedented payment error rates across the nation – particularly due to FNS’ waiver of interviews during the Covid-19 Pandemic Health Emergency.

The previous Administration clearly was focused on expanding program enrollment and benefits to the detriment of the intent and purpose of SNAP. Recycling the prior study funded by FNS and conducted by Mathematica (2015) indicates a desire to “keep testing until desired results are achieved.” Nothing in the study justifies increasing the size of the study at a time where the current Administration is focused on reducing improper payments through effective program integrity initiatives found within USDA FNS’ own SNAP Fraud Framework guidance on best practices for state and local SNAP agencies:

“Eligibility workers are a State agency’s first line of defense against fraud. They should know the indicators of questionable information, such as if a recipient’s expenses exceed their income or if there are inconsistencies in the information provided in and/or interview. This knowledge enables eligibility workers to ask targeted follow-up questions to gain a complete understanding of household circumstances. Eligibility workers should also pay attention to verbal and physical cues. States may offer training on interview skills and techniques for eligibility workers to identify these cues. It is important to remember, if workers flag a case as questionable, it does not necessarily mean the household is ineligible to receive benefits. Rather, it is an indicator that the eligibility worker should ask additional questions and when warranted refer potential fraud for further investigation.”

Source: SNAP Fraud Framework v1.1, page 37

Further studies waiving the interview requirement diminishes a key safeguard also established in FNS’ own best practices and toolkits for state/county/territory administration in the FNS March 2023 State SNAP Interview Toolkit¹ and FNS Policy Memo, “Expedited Service and Interviews.”²

The 2015 Interview Waiver study found:³

1. Increased Risk of Client Error and Overpayments (pages 54-55)

- a. Reduced Earnings Reporting:** The Mathematica study found that the absence of interviews led to a statistically significant decrease in the percentage of applicants reporting earnings, despite an increase in the average reported earnings of those who did. This suggests that clients with lower earnings were less likely to report them, potentially leading to overpayments.
- b. Application Timeliness:** In Utah, the elimination of interviews reduced application processing timeliness, particularly for expedited cases, indicating a risk of procedural delays and errors in urgent cases. The trade-off in reduced timeliness is offset by the increased risk of adding to the disproportionately high rate of client errors with overpayments (Intentional Household Error, IHE).

¹ <https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-state-interview-toolkit-031723.pdf>

² <https://www.fns.usda.gov/snap/admin/expedited-service-and-interviews>

³ “Assessment of the Contributions of an Interview to Supplemental Nutrition Assistance Program Eligibility and Benefit Determinations” found at <https://www.fns.usda.gov/sites/default/files/ops/SNAPInterview.pdf>



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For example, in the most recently published documentation, California reported \$85.9 million in newly established household error claims, and another \$42 million in agency errors. In February 2024, USDA Secretary Thomas Vilsack wrote to Governor Gavin Newsome highlighting the state’s unacceptable application processing timeliness rate, payment error rate, and case and procedural error rates all falling below acceptable performance standards.⁴

- c. **Approval and Denial Shifts:** Procedural denials decreased, while denials for exceeding income limits increased, proving that the lack of an interview reduced opportunities to clarify application discrepancies.

2. Study Ignores and Fails to Address Identity Fraud

- a. **Absence of Direct Client Interaction:** Eliminating the interview process removes an essential human component that can detect fraudulent behavior, identity theft, or misrepresentation. The prior study did not address eligibility fraud or identity fraud, and this new and larger study again fails to address critical program integrity issues relating to fraud.
- b. **Expedited Applications Already are High-Risk for Identity Fraud:** Expedited applications are particularly vulnerable to identity fraud due to regulations that permit postponing eligibility verifications. Waiving the interview process removes critical safeguards, leaving these applications unchecked. The 2015 study did not assess whether recipients of expedited, non-interviewed, and non-verified applications subsequently completed the required regular application or passed necessary verifications, including identity checks. Failure to submit a follow-up application is often an indicator of potential identity or eligibility fraud.

The study clearly does not align with the SNAP Fraud Framework guidance to states on maintaining program integrity. Allocating funds to modernize FNS policies and guidance would better support compliance with the Fraud Framework and assist SNAP administrators in preventing fraud.

3. Demonstrated Issues with Program Integrity

- a. **Administrative Impact:** Although some error rates were statistically reduced in demonstration states (e.g., Oregon and Utah), the findings suggest this may be due to reduced procedural checks rather than genuine improvements in application accuracy. In addition, eliminating interviews actually increased application processing costs and time, suggesting inefficiencies rather than anticipated cost savings.
- b. **USDA OIG and DOJ Investigations:** Hiding program integrity issues (both quality control and fraud) are reminiscent of investigations into states manipulation of the Quality Control process. Waiving the interview requirements to falsely manipulate and obfuscate key quality control

⁴ See <https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-state-activity-report-fy21.pdf>, Table 18, page 29. See also February 8, 2024 letter found at <https://fns-prod.azureedge.us/sites/default/files/resource-files/CA-SNAP-Performance.pdf>



metrics through waivers and options was the foundational issue arising from the False Claims Act findings against states and consulting services (which FNS reportedly promoted).⁵

4. Prior Study’s Impact on Client and Staff Perspectives

- a. **Complex Cases Suffer:** Staff reported that waiving interviews made it more challenging to complete applications, particularly for complex cases requiring additional services or verification.
- b. **Reduced Client Satisfaction:** While some clients appreciated the flexibility, others expressed dissatisfaction, especially those needing personalized one-on-one assistance or facing barriers in completing applications without guidance. UCOWF is particularly concerned with the impact on non-English speaking/English as Second Language applicants who can currently speak to eligibility workers in their native language through the use of interpreters – allowing for clear application requirements and the opportunity to address eligibility concerns.

In conclusion, waiving interviews for SNAP applications and recertifications undermines program integrity by increasing the likelihood of client error, overpayments, and fraud. Historical investigations and regulatory frameworks emphasize the necessity of interviews as a safeguard to verify eligibility, reduce identity fraud, and protect taxpayer funds. Maintaining the interview process aligns with established policies and strengthens the overall integrity of the SNAP program. We cannot see any advantage to applicants, recipients or the taxpayers who fund SNAP by taking humans out of human services. The idea of eliminating application interviews is nothing more than a continuation of ongoing efforts to expand the program through the reduction of sound program integrity practices required of state SNAP agencies.

For all of the above reasons and the documented findings, UCOWF strongly encourages USDA FNS to withdraw this recycled project from consideration and redirect available funds to address legitimate program integrity issues.

Sincerely,

Ashley Wilkes, President
United Council on Welfare Fraud
www.ucowf.net

Cc:

Ms. Jennifer Tiller, USDA Senior Advisor to the Secretary for FNCS

⁵ <https://www.justice.gov/usao-edwa/pr/consultant-agrees-pay-751571-settle-false-claims-act-liability-alleged-falsification>

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