DEPARTMENT OF ECONOMIC SECURITY
Your Partner For A Stronger Arizona

Douglas A. Ducey
Governor

Thomas Betlach
Interim Director

March 23, 2020

Mr. Dwight Crudup
Regional Director
United States Department of Agriculture
Food and Nutrition Service
1100 Commerce Street, Room 522
Dallas, Texas 75242

Dear Mr. Crudup:

On March 13, 2020, President Trump declared a national emergency due to the novel coronavirus (COVID-19) outbreak. This is in addition to Arizona's Governor, Douglas Ducey's statewide Declaration of Emergency issued on March 11, 2020.

Federal and state guidance have directed agencies to take additional steps to prepare for, respond to, and mitigate the spread of COVID-19 for purposes of protecting the health and welfare of all individuals. This pandemic requires social distancing including schools, businesses and workplaces being shut down. While Arizona is at the forefront of using technology to process applications, including an easily accessible online application, the state's resources are being challenged to handle the volume of telephone interviews required to process an influx of Supplemental Nutrition Assistance Program (SNAP) applications. In addition, grocery stores are experiencing an increased demand for food items leaving many store shelves bare.

Enclosed is Arizona's Request to Provide Emergency Allotments (Supplements) to SNAP Households as outlined in H.R 6201, The Families First Coronavirus Response Act.

Adding to our need for responsible leadership and innovation during this time, Arizona is preparing a series of office closures. These closures are critical to ensuring the health and safety of our clients and staff; yet, will potentially add barriers to accessing our services. To mitigate these barriers, Arizona is requesting additional program flexibility during this time. In order to provide uninterrupted assistance to SNAP recipients, the Arizona Department of Economic Security, Family Assistance Administration is requesting your consideration of the enclosed SNAP waivers.

Request to Waive Interview - Waiving the interview during this pandemic will ensure Arizona is better prepared to respond and fulfill our agency's role to provide recovery to our community in a timely manner.

Request to Extend Certification Periods - Extending the certification periods as proposed via an automated process would ensure benefits will continue to be provided to households during this pandemic, reduce workload, and would be a more effective and efficient administration of the SNAP program.

Request to Allow Hot Meals - The need for hot food will remain critical through this pandemic as families experience a loss of income or care which could result in their way of life being disrupted such as decreased access to cooking facilities, hot meals and shelter.

Request to Waive Student Criteria - Currently eligible students are unable to meet the required 20 hours a week of employment due to business closures. The waiver will also ensure that currently eligible students will maintain their SNAP benefits when they report a change due to widespread business closures.

Your prompt attention to our request is appreciated. If you have questions or require additional information, Mary Guzman, Program Manager, FAA Benefits Support Team, Division of Benefits and Medical Eligibility, serves as the lead staff on this matter and may be reached by telephone at (602) 771-5618 or by email at MaryGuzman@azdes.gov.

Sincerely,

Jeffrey W. Morley
Assistant Director
Division of Benefits and Medical Eligibility

Enclosures:
AZ Request to Provide Emergency Allotments
AZ Waiver Request – Waive the Interview
AZ Waiver Request – Extend Certification Periods
AZ Waiver Request – Allow Hot Meals
AZ Waiver Request – Waive Student Criteria

Request to Provide Emergency Allotments (Supplements) to SNAP Households

The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

1. Type of Request: Initial

2. Primary Citation: Families First Coronavirus Response Act

3. State [specify]: AZ

4. Proposed Alternative Procedures:

The State proposes to provide an emergency allotment to address temporary food needs to households to bring all households up to the maximum benefit due to pandemic related economic conditions for up to 2 months. Contingent upon the availability of funding and ongoing need, USDA may approve additional months of emergency issuance with an extension request from the State.

These households are eligible for temporary emergency allotments because:

- There is a public health emergency declared by the Secretary of Health and Human Services and there is a State-wide emergency or disaster declaration (copy attached); and
- Due to Covid-19 [check all that apply]:

_X_ Residents of the State are confirmed to have contracted Covid-19

_X_ Some or all areas of the State are containment or quarantine zones

_X_ Businesses have closed or significantly reduced their hours

_X_ The State's residents have experienced economic impacts due to job suspensions or losses

_X_ The State's residents have been directed to practice social distancing

Issuing Emergency Allotments to Current SNAP Households:

Supplemental emergency allotments would be issued in the following manner:

In April, 2020

___ On a single date [specify]: _____

___ Over a series of days as follows: _____

___ Staggered as follows: _____

_X_ Other [please explain]: The supplemental emergency allotments for April 2020, will be made available to the active SNAP households through the staggered dates of 04/10/2020 – 04/20/2020, once confirmed and finalized through an agreement with the

FIS vendor. All other households who were newly approved will have their supplemental emergency allotment issued before the last day of the month.

In subsequent months, emergency allotments should be provided in accordance with the State's regular issuance schedule. If a State wants to use a different schedule, explain:
All households who are currently on SNAP will have the emergency supplement issued on their normal issuance date.

The State may provide the emergency allotment(s) without contacting the household. While individual notification is not required, States should notify clients consistent with SNAP requirements for mass changes, including notice that emergency allotments will be issued for up to 2 months. Should this schedule change and additional months are approved during the public health emergency, the State will provide a subsequent mass change notice at that time.

Other Requirements:

All emergency allotments will be delivered on the household's EBT card.

The State's SNAP agency also agrees to complete the FNS-292 on a timely basis in accordance with requirements as well as all other normally recurring SNAP reporting included the FNS 46 and 388 reports, on a timely basis in accordance with requirements.

In addition, The State agency will submit weekly reports to FNS with the following information for the entire State:

- The value of EA issued.
- The average issuance amount per household.
- The number of households issued EA

Justification for Request: Coronavirus COVID-19, as provided by the Families First Coronavirus Response Act.

5. Affected Caseload:
One month estimates for existing SNAP households under these procedures:

- Number of households receiving emergency allotments benefits: _209,077_____
- Amount of emergency allotment benefits issued for one month: $ 46,396,795___
- Number of months requested (2 month limit) _04/2020 & 05/2020_____

USDA reserves the right to withdraw or otherwise modify this approval subject to availability of funding.

6. Anticipated Implementation Date: 04/01/2020

7. Signature and Title of Requesting State Agency Official:

Signature

Mary Guzman
Program Manager

Print Name and Title

8. Date of Request: 03/23/2020

STATE WAIVER REQUEST
Initial and Recertification Interview

1. **Waiver Serial Number (if applicable):** N/A

2. **Type of request:** Initial

3. **Regulatory citation:** 7 CFR 273.2(a)(2); 273.2(d)(1); 273.2(e)(1); 273.2(e)(1)(i); 273.2(e)(1)(iv); 273.2 (e)(2); 273.2(i)(3)(iii); 273.2(j)(1)(ii)

4. **State:** Arizona

5. **Region:** Southwest Region (SWRO)

6. **Regulatory requirements:**

   - 273.2(a)(2) requires an interview as part of the SNAP application process.
   - 273.2(d)(1) requires the household to cooperate with the interview process in order for the state to determine eligibility and allows the state agency to deny the household for failure to cooperate.
   - 273.2(e)(1) requires the state to interview households at initial certification and at least once every 12 months thereafter.
   - 273.2(e)(1)(i) requires the state agency to inform the applicant of the opportunity for a face-to-face interview at the time of the application and recertification.
   - 273.2(e)(1)(iv) requires the state agency to provide bilingual interview services.
   - 273.2(e)(2) allows the state agency to use a telephone interview instead of a face-to-face interview for all applicant households.
   - 273.2(i)(3)(iii) requires the state agency to complete an interview for processing expedited applications.
   - 273.2(j)(1)(ii) allows the state agency to conduct a single interview at initial application for joint public assistance (PA) and SNAP applications.

7. **Description of alternative procedures:** Arizona currently allows telephone interviews in lieu of face-to-face interviews in accordance with 7 CFR 273.2(e)(2). Arizona is proposing to waive all interviews for SNAP initial applications and recertifications including both telephonic and face-to-face interviews due to the coronavirus human pandemic. The state will continue to utilize electronic data sources when processing applications. The state will follow existing requirements in 7 CFR 273.2(c)(5) and 273.2(f) for obtaining additional verification from households when electronic data sources do not match or verify the information provided by the household on the application. Arizona proposes to waive the interview for 3 months effective upon the waiver submission date. Arizona will offer an in-person interview if requested on a case-by-case basis. Individuals will continue to be able to call the

Arizona Department of Economic Security, Family Assistance Administration to ask questions about their application.

8. **Justification for request:** This waiver is requested under provisions of 7 CFR 272.3(c)(1)(i) which allows the Food and Nutrition Service to authorize waivers due to extraordinary temporary situations, and 7 CFR 272.3(c)(1(ii) which allows approval of waivers which result in a more effective and efficient administration of the SNAP program.

   On March 13, 2020 President Trump declared a national emergency due to the novel coronavirus (COVID-19) outbreak. Additionally, Arizona's Governor, Douglas Ducey, also issued a statewide Declaration of Emergency on March 11, 2020 due to the impact of the COVID-19. Federal and state guidance have directed agencies to take additional steps to prepare for, respond to, and mitigate the spread of COVID-19 for purposes of protecting the health and welfare of all individuals. This pandemic requires social distancing including schools, businesses and workplaces being shut down. While Arizona is at the forefront of using technology to process applications, including an easily accessible online application, the state does not have the resources to handle the volume of telephone interviews required to process an influx of SNAP applications. Waiving the interview during this pandemic will ensure that Arizona is better prepared to respond and fulfill our agency's role to provide recovery to our community in a timely manner.

9. **Caseload information, including percent of caseload and description of population expected to be affected by this waiver:** This waiver is requested for all initial applications and recertifications requiring an interview. The current total statewide caseload as of February 2020, is 380,395.

10. **Anticipated impact on households and State agency operations:** The ability to waive the interview will help the state streamline program administration and increase application processing efficiency during this pandemic. Current SNAP recipients and new applicants will receive benefits timely and experience increased customer service and access to SNAP benefits.

11. **Anticipated implementation date and time period for which waiver is needed (please indicate if the waiver approval is needed to make system adjustments):** The waiver is requested for immediate implementation effective with the waiver submission by the state for a period of 3 months.

12. **Proposed quality control review procedures:** No special QC procedures are required for cases subject to the provisions of this waiver.

13. Name, Title and email of requesting official:

Signature _____
Name: Jeffrey W. Morley
Title: Assistant Director, Division of Benefits and Medical Eligibility
AZ Department of Economic Security
Email: JMorley@azdes.gov
Tel: 602-542-3577

14. Date of request: March 23, 2020

15. State agency staff contact (name/email/telephone):

Name: Mary Guzman
Title: Program Manager, FAA Benefits Support Team
Division of Benefits and Medical Eligibility
Email: MaryGuzman@azdes.gov
Tel: 602-771-5618

16. Regional Office contact person (*to be completed by FNS regional office*):

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** NA

2. **Type of request:** Initial

3. **Regulatory citation:** 7 CFR 273.12(a)(5)(iii)

4. **State:** Arizona

5. **Region:** Southwest Region (SWRO)

6. **Regulatory requirements:**

   - 7 CFR 273. I0(f)(3)(i) requires a minimum certification period of six months for most households.
   - 7 CFR 273.10(f)(5) allows states to extend established certification periods up to a maximum of 24 months for households that consist of all elderly or disabled individuals and up to 12 months for all other households.

7. **Description of alternative procedures:**

   To ensure that SNAP recipients do not lose access to critical nutritional benefits provided by the SNAP program, Arizona is proposing to extend certification periods by three months for each certification period set to expire during the State of Emergency and for the two months following the termination of the State Emergency. Recertification would be moved according to the following schedule:

Original Cert Expiration Date	New Cert Expiration Date
March 31	June 30
April 30	July 31
May 31	August 31
This pattern would continue for the duration of, and the two months immediately following termination of, the State of Emergency.	

   The extension would be applied to any household with a certification period expiring during a month where the State of Emergency is in effect at the start of the month.

8. **Justification for request:** This waiver is requested under provisions of 7 CFR 272.3(c)(1)(i) which allows the Food and Nutrition Service to authorize waivers due to extraordinary temporary situations, and 7 CFR 272.3(c)(1)(ii), which allows approval of waivers which result in a more effective and efficient administration of the SNAP program.

On March 13, 2020, President Trump declared a national emergency due to the Novel Coronavirus (COVID-19) outbreak. Additionally, Arizona's Governor, Douglas Ducey, also issued a statewide Declaration of Emergency on March 11, 2020 due to impacts of COVID-19. Federal and State guidance have directed agencies to take additional steps to prepare for, respond to, and mitigate the spread of COVID-19 for purposes of protecting the health and welfare of all individuals. This pandemic requires social distancing including schools, businesses, and other workplaces being shut down. Extending the certification periods as proposed via an automated process would ensure benefits will continue to be provided to households during this pandemic and would be a more effective and efficient administration of the SNAP program. Extending the certification period for an additional three months to households whose benefits are scheduled to end in March, April, and May 2020, which will allow them to continue to participate in the SNAP program. Additionally, the extension will reduce the recertification-related workload for the next three months and will provide the State of Arizona flexibility in the administration of the SNAP program to mitigate future workload concerns that may arise as impacts from the pandemic progress and evolve.

9. **Caseload information, including percent of caseload and description of population expected to be affected by this waiver:** The estimated number of cases that would be extended under this proposal is approximately 30,000 cases per month for March 2020, April 2020, and May 2020. The current total statewide caseload as of February 2020, is 380,395.

10. **Anticipated impact on households and State agency operations:** This waiver will ensure current SNAP households continue to receive benefits and allow the State to more effectively use staff to timely process the influx of new applications and reviews resulting from federal and state pandemic guidance. Current SNAP recipients and new applicants will receive benefits timely and experience increased customer service and access to SNAP benefits.

11. **Anticipated implementation date and time period for which waiver is needed (please indicate if the waiver approval is needed to make system adjustments):** The waiver is requested for immediate implementation. Waiver approval is needed to make system adjustments for SNAP recertifications scheduled to end in March, April, and May 2020.

12. **Proposed quality control review procedures:** No special QC procedures are required for cases subject to the provisions of this waiver.

13. **Signature and title of requesting official:**

Signature _____
Name: Jeffrey W. Morley
Title: Assistant Director, Division of Benefits and Medical Eligibility

AZ Department of Economic Security
Email: JMorley@azdes.gov
Tel: 602-542-3577

14. Date of request: March 23, 2020

15. State agency staff contact (name/email/telephone):

Name: Mary Guzman
Title: Program Manager, FAA Benefits Support Team
Division of Benefits and Medical Eligibility
Email: MaryGuzman@azdes.gov
Tel: 602-771-5618

16. Regional office contact person (*to be completed by FNS regional office*):

STATE WAIVER REQUEST
Hot Food

1. **Waiver Serial Number (if applicable):**

2. **Type of request:** Initial

3. **Regulatory citation:** Section 3(k)(1) of the Food and Nutrition Act of 2008 as amended

4. **State:** Arizona

5. **Region:** SWRO

6. **Regulatory requirements:** Section 3(k)1) of the Food and Nutrition Act of 2008 and Federal regulation define "food" as "...any food or food product for home consumption except alcoholic beverages, tobacco, and hot foods or hot food products ready for immediate consumption..."

7. **Description of alternative procedures:** The state agency is requesting a waiver to allow hot foods and hot foods products prepared for immediate consumption to be considered "eligible foods" as long as they are purchased in FNS-authorized retail food stores in all counties with Arizona.

8. **Justification for request:** This waiver is requested under provision of 7 CFR 272.3(c)(1)(i) which allows the Food and Nutrition Service to authorize waivers due to extraordinary temporary situations, and 7 CFR 272.3(c)(1)(ii) which allows approval of waivers which result in a more effective and efficient administration of the SNAP program.

   On March 13, 2020 President Trump declared a national emergency due to the novel coronavirus (COVID-19) outbreak. Additionally, Arizona's governor, Douglas Ducey's statewide Declaration of Emergency issued on March 11,2020 due to impacts of COVID-19. Federal and state guidance have directed agencies to take additional steps to prepare for, respond to, and mitigate the spread of COVID-19 for purposes of protecting the health and welfare of all individuals.

   This pandemic requires social distancing including schools, businesses and workplaces being shut down. In addition, grocery stores are experiencing an increased demand for food items leaving many store shelves bare. The need for hot food will remain critical through this pandemic as families, and elderly and disabled households experience a loss of income or care which could result in their way of life being disrupted such as decreased access to cooking facilities, hot meals and shelter. Waiving the Act and regulation language that excludes the purchase of hot foods and

hot food products prepared for immediate consumption will ensure that SNAP recipients most adversely affected by this pandemic have access to hot meals.

9. **Anticipated impact on households and State agency operations:** Allowing the purchase of hot foods will assist and provide critical relief to SNAP household most adversely affected including, but not limited to, elderly and disabled households, families with children home from school and those who experience a loss of income.

10. **Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable):** Would not apply.

11. **Anticipated implementation date and time period for which waiver is needed:** Households in Arizona will be able to purchase hot foods and hot food products from FNS-authorized retailers from the approval date of this waiver until June 30, 2020.

12. **Proposed quality control review procedures:** The proposal does not affect quality control sampling or procedures.

13. **Signature and title of requesting official:**

Signature
Name: Jeffrey W. Morley
Title: Assistant Director, Division of Benefits and Medical Eligibility
AZ Department of Economic Security
Email: JMorley@azdes.gov
Tel: 602-542-3577

14. **Date of request: March 23, 2020**

15. **State agency staff contact (name/email/telephone):**

Name: Mary Guzman
Title: Program Manager, FAA Benefits Support Team
Division of Benefits and Medical Eligibility
Email: MaryGuzman@azdes.gov
Tel: 602-771-5618

16. **Regional office contact person (*to be completed by FNS regional office*):**

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** N/A

2. **Type of request:** Initial

3. **Regulatory citation:** 7 CFR 273.5(a); 273.5(b)

4. **State:** Arizona

5. **Region:** Southwest Region (SWRO)

6. **Regulatory requirements:** The Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.5(a) state that an individual who is enrolled at least half-time in an institution of higher education shall be ineligible to participate in SNAP unless the individual qualifies for one of the exemptions contained in 7 CFR 273.5(b).

7. **Description of alternative procedures:** Arizona is requesting a waiver of regulations at 7 CFR 273.5(a) to allow students who are enrolled at least half-time in an institution of higher education to be eligible to participate in SNAP without being required to meet one of the exemptions in 7 CFR 273.5(b). The state agency will reevaluate for student eligibility at the next periodic report or eligibility review after the pandemic has ceased.

8. **Justification for request:** Because of the COVID-19 pandemic, many businesses, employers and school offices are closed. This makes it virtually impossible to verify if a student is enrolled in an institution of higher education, if the student is approved to participate in a work study program, or if a student is assigned to or placed in an institution of higher education through or in compliance with one of the programs identified in 7 CFR 273.5(b)(11)(i) through 273.5(b)(11)(iv). In addition, students who are eligible for SNAP are impacted by business closures and are unable to work the required 20 hours a week of employment mandated in 7 CFR 273.5(b)(5).

9. **Caseload information, including percent of caseload and description of population expected to be affected by this waiver:** The total statewide caseload as of February 2020 is 380,395. Although Arizona cannot quantify the percentage of recipients that this waiver might impact, it is expected that the number of existing eligible students will remain the same. The number of students who are currently not eligible, but may become eligible due to the waiver, is unknown.

10. **Anticipated impact on households and State agency operations:** The waiver will allow students to be eligible for SNAP without the requirement to meet an exemption in 7 CFR 273.5(b) or for the agency to verify if the student meets one of these exemptions. The waiver will also ensure that currently eligible students will

maintain their SNAP benefits when they report a change in employment as of March 11, 2020 due to widespread business closures.

11. **Anticipated implementation date and time period for which waiver is needed (please indicate if the waiver approval is needed to make system adjustments):** The waiver is requested for immediate implementation effective upon approval, and through applications and recertifications processed through June 30, 2020.

12. **Proposed quality control review procedures:** No special QC procedures are required for cases subject to the provisions of this waiver.

13. **Name, Title and email of requesting official:**

Signature _____
Name: Jeffrey W. Morley
Title: Assistant Director, Division of Benefits and Medical Eligibility
AZ Department of Economic Security
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Tel: 602-542-3577

14. **Date of request:** March 23, 2020

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