

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** COV-085
2. **Type of request:** Waiver of Initial and Recertification Interviews
3. **Regulatory citation:** 7 CFR 273.2(a)(2), 273.2(e), 273.14(b)(3), Families First Coronavirus Response Act
4. **State:** Alabama
5. **Region:** Southeast
6. **Regulatory requirements:** SNAP regulations at 7 CFR 273.2(a)(2) required that the application process include an interview.
7. **Proposed alternative procedures:** The State of Alabama will not be required to interview a household at initial or recertification application as long as the applicant's identity has been verified and all mandatory verifications have been received or can be independently verified by Food Assistance Division. County offices will be required to contact the household if any information on the application is unclear, questionable, or cannot be verified. The State will make every attempt to verify household circumstances through data matching and mailing or uploading verifications to the State system.
8. **Justification for request:** COVID-19 pandemic and positive cases in Alabama.
9. **Caseload information, including percent of caseload and description of population expected to be affected by this waiver:** Currently, Alabama continues to experience an increase in initial SNAP applications submitted by internet, mail, and in person due to COVID-19 and the unemployment rate. From July 2019 to July 2020, SNAP issuance has increased 54.85% in Alabama partially due to COVID-19.
10. **Anticipated impact on households and State agency operations:** The Interview Adjustment Waiver will allow eligible households to have access to SNAP benefits sooner and allow county offices to process the influx of SNAP applications due to the COVID-19 more efficiently.
11. **Anticipated implementation date and time period for which waiver is needed (please indicate if the waiver approval is needed to make system adjustments):** September 1, 2020 through September 30, 2020
12. **Proposed quality control review procedures:** No special Quality Control (QC) procedures are requested.

13. Name, title, and email of requesting official:

Name: Brandon Hardin

Title: Director

Email: Brandon.Hardin@dhr.alabama.gov

14. Date of request: 8/21/2020

15. State agency staff contact:

Name: Franai White

Title: Program Operations Manager

Email: Franai.White@dhr.alabama.gov

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

SNAP COVID Adjustment Request and Transition Plan Summary

State Agency and Region: State of Alabama SNAP – Southeast Region

What Adjustment(s) is the State Requesting

- Eliminate (Waiver of) Initial and Recertification Interviews – September 30, 2020
- (Waiver to) Postpone Expedited Service Interview- September 30, 2020

Demonstrated Need for Extension of the Adjustment

FY 2020 Participation Trends for Alabama before and during COVID-19 (Does not include P-EBT):

FY 2020	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20
SNAP	334,581	335,919	354,410	363,723	365,109	361,924
Issuance	83,479,156	124,969,334	129,665,459	135,325,230	134,292,347	132,128,242

From July 2019 to July 2020, the changes are as follows:

- Households increased 21,285 (6.25%)
- Individuals increases 28,251 (3.93%)
- Issuance increased \$46,804,038 (54.85%)

P-EBT Issuance July 2020: \$2,986,959

Total Applications:

Month	February	March	April	May	June	July
Applications	53, 716	71,398	118,616	96,667	72,807	70,464

How Does the State Plan to Transition to the New Normal:

Alabama plans to continue to make SNAP applications and periodic report forms available online, allow clients to view their account online, and offer free communication assistance. Continue to make the public aware of retailers that allow online purchasing with EBT cards.

Local county offices will continue to offer telephone interviews, assess local program operations to determine the most efficient distribution of daily tasks and processing of applications in order to handle the increase in volume. County offices will continue to make attempts to independently verify mandatory verification through third-party sources (i.e. The Work Number) in order to determine eligibility quickly. Chrome Books will continue to be used which allow some staff to work remotely in order to decrease the number of staff physically in county offices and at State Office as needed, according to Coronavirus cases in Alabama.

Alabama will continue to monitor the participation trends including, the number of SNAP applications, the number of SNAP households, and the amount of SNAP benefits issued monthly. The Food Assistance Division will also include virtual means of communication and training with staff that allow social distancing including phone conferences, webinars, and Zoom conferencing, which was recently licensed for the State of Alabama.

Regions Recommendation: **Deny** - SERO recommends denial of the request. Alabama did not provide supplemental information to support their case, such as data on the extent of recertifications backlog, staffing limitations, or a transition plan to return to new normal if the Interview requirements are waived for September 2020.