**Waiver Request- Connecticut**

1. **Type of request:** Initial

2. **Primary regulation citation:** 7 CFR 273.18(e)(1), 7 CFR 273.18(e)(5)

3. **State:** Connecticut

4. **Region:** Northeast

5. **Regulatory requirements:** 7 CFR 273.18(e)(1) states that state agencies must begin collection action on all claims unless they are not cost-effective. 7 CFR 273.18(e)(5) requires that claims become delinquent if not paid by the due date and a satisfactory payment arrangement has not been made.

6. **Description of alternative procedures:** CT requests to suspend all collection of active recoupment of SNAP overpayments and delay the collection actions on new recoupsments to allow SNAP recipients to temporarily receive their full benefit amount for a period of 60 days during this time of uncertainty. Households will still be liable for their outstanding debts; however, they will not be required to repay during this temporary waiver period and will not be considered delinquent for lack of payment by payment due dates already established via the repayment agreement. Households with newly identified overpayments will also be liable, but their collection will be postponed until after the 60-day waiver period.

7. **Justification for request:** CT is experiencing unique and unprecedented circumstances with the onset of COVID-19. CT wants to ensure that individuals and families that are affected by COVID-19, through transmission or lifestyle impacts, are able to maintain their SNAP benefits without undue burden. CT wants to ensure as few barriers as possible to food access during this period of uncertainty. By suspending claim activities for a 60-day period, CT will ensure that households have access to their full SNAP benefit during a period of economic uncertainty and particular need for food access. Exposure to COVID-19 is expected to perpetuate for ongoing months and households have been advised to prepare two-week’s worth of food on site. Reducing SNAP benefits due to claims collection places an undue burden on households to obtain adequate access to food during this unexpected time. By suspending household claims collections for 60 days, households subject to recoveries will have adequate funds to purchase food items and prepare for these unanticipated circumstances.

8. **Anticipated impact on households and State Agency operations:** Households currently active on SNAP will temporarily receive their full benefit amount instead of having a reduced SNAP benefit due to overpayment recoupmnt. Households that are closed from SNAP but still liable for overpayments will not be penalized or considered delinquent for missed payments. The State Agency will work with our internal Information Technology (IT) support team to implement a plan, which will suspend all overpayment collections in the Integrated Eligibility System for a period of 60 days.
9. **Caseload information, including percent of caseload and description of population expected to be affected by this waiver:** CT is actively recouping or collecting payment from approximately 6,321 SNAP households as of March 2020.

10. **Time Period for which Waiver is needed:** This waiver is requesting to be implemented upon approval from FNS. It will be valid for up to 60 days from the date of approval.

11. **Signature and Title of Requesting Official:**

   Deidre Gifford, MD, MPH  
   Commissioner, Connecticut Department of Social Services

12. **Date of Request:** March 16, 2020