

Waiver Request- Connecticut

1. **Type of request:** Initial
2. **Primary regulation citation:** 7 CFR 273.2(i), 7 CFR 273.2(e)
3. **State:** Connecticut
4. **Region:** Northeast
5. **Regulatory requirements:** 7 CFR 273.2(i) outlines eligibility standards for expedited processing. 7 CFR 273.2(e) mandates an initial interview at initial certification.
6. **Description of alternative procedures:** This waiver would allow CT to waive the initial interview during application processing. As is current process, eligibility staff will attempt two cold calls to the household to complete the interview. If they cannot reach the household, they will postpone the eligibility interview and authorize expedited benefits. Identity verification will remain mandatory. Eligibility for Ex-SNAP will be determined with all available information received at time of application. Additionally, CT is requesting to waive the eligibility requirements for expedited processing to temporarily allow all applicants to receive Ex-SNAP benefits, assuming they have met applicable requirements. Households will not have to meet the expedited eligibility requirements outlined in 7 CFR 273.2(i)(1). While applications will be processed as soon as possible, due to the increase in SNAP application received, CT is requesting to waive the 7 day expedited timeline identified in 7 CFR 273.2(i)(3)(i). While CT will determine eligibility for all Ex-SNAP applications as quickly as possible, the state recognizes that increasing the number of applications eligible for Ex-SNAP may slightly delay the initial 7-day processing timeframe.
7. **Justification for request:** The COVID-19 outbreak has resulted in a significant number of CT households facing immediate economic insecurity. The Governor of CT announced a Public Health Emergency on 3/10/2020 and since then has released several executive orders that include the closing of many businesses and large gatherings. President Donald Trump subsequently declared a national state of emergency on 3/13/20. In response, many businesses and schools have closed. CT DSS has also closed their service centers to the public. The COVID-19 outbreak is spreading rapidly, with 327 individuals affected in CT as of 3/23/2020. These numbers have been growing exponentially daily since the outbreak began. As a result, many households have lost their source of income are in need of immediate food assistance. Additionally, the CT DSS workforce has been reduced as a result of worker illness, child care needs, caring for a family member who has been infected by or exhibits symptoms of COVID-19, and the Governor's "Stay Safe, Stay Home" initiative. As a result, there are fewer eligibility staff available to determine eligibility for SNAP as more households come in to apply for benefits. Waiving the expedited eligibility criteria and application interview requirement would allow CT to provide much needed food benefits more expeditiously than if subject to the permanent regulations. CT has been prepared to sunset the postponed interview waiver for Ex-SNAP

cases effective 4/25/2020. However, considering the need to streamline eligibility determinations it is requested that this interview waiver continue beyond 4/25/2020 and to waive the requirement entirely for the duration of the public health emergency.

8. **Anticipated impact on households and State Agency operations:** This waiver will increase food access to households in CT that have been impacted by COVID-19. It will also increase the number of expedited applications received and processed by the State Agency, improving the public health response to COVID-19.
9. **Caseload information, including percent of caseload and description of population expected to be affected by this waiver:** CT currently averages 9,326 SNAP applications monthly since 8/2019. This number is expected to increase as more households seek food access due to interruptions to income from COVID-19 related mandates. For example, on 3/19/2020, CT had received over 550 applications for SNAP, well over the traditional average of approximately 310 applications daily.
10. **Time Period for which Waiver is needed:** CT would like to implement this waiver as soon as possible and extend it for 90 days from implementation.
11. **Proposed Quality Control Review Procedures:** QC will hold CT harmless for waiving the expedited eligibility criteria, waiving the interview requirement after 4/25/2020, and 7-day processing standard.
12. **Signature and Title of Requesting Official:**

Daniel Giacomi
Program Administration Manager, CT Department of Social Services

13. **Date of Request:** March 23, 2020