March 20, 2020

Anthea Seymour
Administrator
District of Columbia Department of Human Services
P.O. Box 91920
64 New York Avenue, North East
Washington, DC 20002

RE: SNAP – District of Columbia Request to Extend Certification Periods and Adjust Reporting Requirements Due to COVID-19 – Approval

Dear Ms. Seymour:

This letter transmits approval of the District of Columbia Department of Human Services (DHS) adjustment request (Adjustment # COV-001) to extend certification periods and adjust periodic reporting requirements for ongoing Supplemental Nutrition Assistance Program (SNAP) households District-wide. FNS is approving this request under authorization of the Families First Coronavirus Response Act (P.L. 116-127).

The Food and Nutrition Service (FNS) approves the State agency’s request to adjust the certification provisions of section 3(f) of the Food and Nutrition Act of 2008 (the Act) and SNAP regulations at 7 CFR 273.10(f)(5). The State agency may extend certification periods for households scheduled to expire in March, April and May 2020, for 6 months until September, October and November 2020. This adjustment includes households with earned income that by regulation cannot normally be certified for more than a six month period.

FNS also grants the State agency’s request to adjust the periodic reporting requirements of section 6(c)(1)(D)(i) of the Act, and SNAP regulations at 7 CFR 273.10(f)(1) and 7 CFR 273.12(a)(5)(iii)(B) for ongoing households in the approved areas.

If you have questions or need additional information regarding this adjustment, please contact your respective Regional office representative.

Sincerely,

Sasha Gersten-Paal
Program Development Division
Supplemental Nutrition Assistance Program

Enclosure
ENCLOSURE

EXTEND CERTIFICATION PERIODS AND ADJUST REPORTING REQUIREMENTS ADJUSTMENT RESPONSE

1. Adjustment serial number: COV-001

2. Type of request: Initial

3. Regulatory citation: 7 CFR 273.10(f)(5)

4. State: District of Columbia

5. Region: Mid-Atlantic

6. Regulatory requirements: Supplemental Nutrition Assistance (SNAP) regulations at 7 CFR 273.10(f)(3)(i) require a minimum certification period of 6 months for most households. Regulations at 7 CFR 273.10(f)(5) allow states to extend certification periods up to 12 months or 24 months for those households that are all elderly or disabled. Regulations at 7 CFR 273.12(a)(5)(iii) require an interim periodic report in the sixth month for households assigned to simplified reporting (SR), if the certification period exceeds 6 months.

SNAP regulations at 7 CFR 273.14 state that no household may participate beyond the expiration of the certification period assigned in accordance with § 273.10(f) without a determination of eligibility for a new period. The State agency must establish procedures for notifying households of expiration dates, providing application forms, scheduling interviews, and recertifying eligible households prior to the expiration of certification periods. Households must apply for recertification and comply with interview and verification requirements.

7. Description of alternative procedures: The State agency will adjust the expiration for certification periods expiring in March, April and May 2020 and will extend the certification period of these households for 6 months until September, October and November 2020. The state will also adjust the periodic reporting requirement for households with a period report due between March through May 2020 and for households whose certification period is extended under this waiver.

8. Action and reason for approval or denial: The Food and Nutrition Service (FNS) recognizes the need for State agency measures for effective
and efficient program management. FNS is approving this request for 3
months, effective March 1, 2020.

9. **Legislative basis for action:** Approval is based on the Families First
Coronavirus Response Act (P.L. 116-127), which allows FNS to approve
adjustments that would result in a more effective and efficient
administration of the program.

10. **Conditions and reasons:** Approval is contingent upon the following
conditions:
- The State must notify households impacted by this approval and continue
to comply with the notice requirements at 7 CFR 273.10(f)(5).
- SNAP Quality Control will review against the terms of this adjustment
and in accordance with FNS Handbook 310.
- The State agency will submit a request to FNS for approval if it wishes to
extend this adjustment beyond the initial period.

11. **Evaluation Data Requirements:** The State agency must provide to FNS
the data and analysis listed below required for evaluation of this waiver.

- Estimated number of households affected by this
adjustment;
- A narrative on the effect of program access and client
satisfaction, including an analysis of any client or advocate
complaints received related to the waived procedure;
- A narrative on the effect of providing timely and accurate
benefits; and
- A narrative on the effect of any other aspects of the
eligibility process including the ability to manage staff
caseload growth and the impact on administrative
efficiency.


13. **Limitation, if any, on approval:** Approval of this adjustment is limited to
the State SNAP agency.

14. **Quality control procedures:** No special Quality Control (QC) procedures
are required for cases subject to the provisions of this adjustment. Cases
should be reviewed using standard review procedures contained in the FNS
Handbook 310.
15. **Date of National Office action:** March 20, 2020

16. **Anticipated implementation date (notify FNS if actual date differs):**
   
   Upon receipt of approval