

CORE VERIFICATION AND INTERVIEW ADJUSTMENT REQUEST

1. **Adjustment serial number:**
2. **Type of request:** Initial
3. **Regulatory citation:** 7 CFR § 273.2(f)(8), 7 CFR § 273.14(b)(3), 7 CFR § 273.2(a)(2), 7 CFR § 273.2(e)
4. **State:** District of Columbia
5. **Region:** Mid-Atlantic
6. **Regulatory requirements:** Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR § 273.2(f)(8) require that the State agency verify changes in income if the source or amount has changed by more than \$50; previously unreported medical expenses, actual utility expenses, and total recurring medical expenses changed by more than \$25; changes in legal obligation to pay child support; and newly obtained social security numbers.

Regulations at 7 CFR § 273.14(b)(3) require that the State agency to conduct an interview once every 12 months for households certified for 12 months or less. The interview must comply with the interview requirements at 7 CFR § 273.2(e).

Regulations at 7 CFR § 273.2(a)(2) requires that the application process include an interview. Regulations at 7 CFR § 273.2(e) requires that the State agency interview households for eligibility before certifying.

7. **Description of alternative procedures:**

The District of Columbia (District) Department of Human Services (DHS) will complete all standard, automatic data matching for income – including possible changes in income from unemployment benefits – as well as other purposes normally completed at recertification. The following data matches will be conducted:

 - Work Number to verify reported income
 - District Department of Employment Services interfaces for wages and Unemployment Insurance Benefits (UIB)
 - Social Security Administration (SSA) interfaces to determine a change in SSA benefits, earned income, pensions, incarceration, death, and Social Security Numbers (BENDEX, SSI/SDX, BEERS, PVS, Death Master File)
 - State and PARIS interface for benefit receipt in other States.

No other verifications will be requested from the household unless information reported by the household on the recertification application is questionable.

DHS will review initial and recertification applications and conduct streamlined interviews under the following circumstances:

- Information reported on the recertification is unclear, incomplete, or inconsistent
- A data match from a third-party data source conflicts with information reported by the household

DHS anticipates conducting streamline interviews with over 50% of households who submit initial and recertification applications.

8. Justification for request:

Pursuant to section 2302(a)(2) of the Families First Coronavirus Response Act of 2020 (Pub. L. No. 116-127), the Secretary of Agriculture is provided authority to adjust the application and reporting requirements under the Food and Nutrition Act of 2008, as amended, to be consistent with what is practicable under actual conditions in areas affected by the COVID-19 Public Health Emergency. In the District, the Mayor of the District of Columbia declared a Public Emergency and a Public Health Emergency as a result of the COVID-19 through Mayor's Orders 2020-045 and 2020-046, dated March 11, 2020, respectively, and subsequent Orders extending those declarations, which is currently extended through October 9, 2020.

DHS anticipates a 182% increase in the number of recertification in the month of September compared with September 2019. Along with the increases in other certifications actions, DHS is expecting a 50% - 75% staffing shortfall without any adjustments leading to a 14,000 – 20,000 backlog of certification actions. With the adjustments, DHS anticipates a reduction in the workload allowing DHS caseworkers to complete more certifications actions to reduce the overall expected backlog to 11,000 – 17,000.

9. Anticipate impact on households and State agency operations:

DHS anticipates this adjustment will make the recertification process more efficient for households to submit a recertification by reducing the verification burden while still ensuring households are certified for appropriate benefit levels.

DHS anticipates this adjustment will allow caseworkers to process more certification actions due in September. In addition, the adjustments help balance program access and integrity by ensuring income and other eligibility factors are verified prior to recertifying households.

10. Caseload information, including percent, characteristics, and quality control error rate for affected portion:

The adjustment will affect on-going households due for recertification in September 2020.

- 8,100 are estimated to submit an initial application in the month of September
- 7,863 households are due for recertification and DHS expects 5,740 households will complete their recertifications.
- DC's Fiscal Year 2019 Quality Control Payment Error Rate is 15.74 percent

11. Anticipated implementation date and time period for which waiver is needed: DHS is requesting expedited approval of this request for the month of September 2020 contingent on both the public health emergency declaration by the Secretary of Health and Human

Services under section 319 of the Public Health Service Act related to an outbreak of COVID-19 and Public Health Emergency Declaration remaining in effect.

12. State agency submitting waiver request and State contact person:

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15. Signature and title of requesting official:

Name: Anthea Seymour
Title: Administrator, Economic Security Administration,
Department of Human Services, District of Columbia Government
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13. Date of request:
August 10, 2020

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

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