

## STATE WAIVER REQUEST

### Waiving Student Requirements for Supplemental Nutrition Assistance Program (SNAP)

1. **Type of request:** Initial
2. **Primary citation:** 7 CFR §273.5(a)
3. **State:** District of Columbia
4. **Region:** MARO
5. **Requirements:** 7 CFR §273.5(a) limits SNAP eligibility to individuals enrolled at least half-time in an institution of higher education unless the individual qualifies for an exemption specified at 7 CFR §273.5(b).
6. **Proposed alternative procedures:** The District of Columbia (District) is requesting a waiver of regulations at 7 CFR §273.5(a) to allow individuals that are enrolled at least half-time in an institution of higher education to receive SNAP benefits without meeting one of the exemptions contained in 7 CFR §273.5(b) in response to the outbreak of COVID-19.

The District will re-evaluate for student eligibility at the next periodic report or eligibility review, after the pandemic has ceased.

7. **Justification for request:**
  - The Secretary of Health and Human Services declared a Public Health Emergency under section 319 of the Public Health Service Act as a result of COVID-19 retroactive to January 27, 2020.<sup>1</sup>
  - The Mayor of the District of Columbia declared a Public Emergency and a Public Health Emergency as a result of the COVID-19 effective March 11, 2020 and extended on March 20, 2020.<sup>2</sup>
  - On March 24, 2020, the University of the District of Columbia closed the campus to students and suspended many classes through April 27, 2020. All other private colleges/universities in the District have also closed their campus and are offering courses online.
  - On March 24, 2020, the Mayor of the District of Columbia ordered the temporary closure of non-essential business and prohibition of gatherings of 10 or more people effective March 25, 2020 and expiring April 24, 2020.<sup>3</sup>

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<sup>1</sup> Source: <https://www.phe.gov/emergency/news/healthactions/phe/Pages/2019-nCoV.aspx>

<sup>2</sup> Source: <https://mayor.dc.gov/sites/default/files/u23/Mayor%60s%20%20Order%202020-50.pdf>

<sup>3</sup> Source: [https://coronavirus.dc.gov/sites/default/files/dc/sites/mayoromb/release\\_content/attachments/Mayor%27s%20Order%202020-053%20Closure%20of%20Non-Essential%20Businesses%20and%20Prohibiti....pdf](https://coronavirus.dc.gov/sites/default/files/dc/sites/mayoromb/release_content/attachments/Mayor%27s%20Order%202020-053%20Closure%20of%20Non-Essential%20Businesses%20and%20Prohibiti....pdf)

As a result of the COVID-19 pandemic and resulting Mayoral orders in place, many individuals need to self-quarantine and engage in social distancing, which in turn has forced many businesses, employers, and school offices to close. This makes it difficult to verify if a student is enrolled in an institution of higher education, if the student is approved to participate in a work study program, or if the student is assigned to or placed in an institution of higher education through or in compliance with one of the programs identified in paragraphs (b)(11)(i) through (b)(11)(iv) of 273.5. In addition, with many businesses closed, it is impossible for many students to be employed a minimum of 20 hour per week.

- 8. Affected Caseload:** The waiver would apply to any eligible students in the entire District. The District cannot quantify the number of recipients this waiver might impact.
- 9. Anticipated implementation date and time period for which waiver is needed:** The District is requesting that this waiver be effective on approval and for the duration of the federal COVID-19 Emergency Declaration and District of Columbia State of Emergency and a Public Health Emergency related to COVID-19, ending only after all of these emergency declarations have concluded.
- 10. State agency submitting waiver request and State contact person:**

Anthea Seymour  
Administrator  
Economic Security Administration  
Department of Human Services  
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Washington, DC 20002  
(202) 698-3906  
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- 11. Signature and Title of Requesting State Agency Official:**



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Administrator, Economic Security Administration, Department of Human Services  
Email for transmission of response: [Anthea.seymour@dc.gov](mailto:Anthea.seymour@dc.gov)

- 12. Date of request:**  
**March 27, 2020**