

WAIVER REQUEST
CERTIFICATION PERIODS

1. **Type of Request:** Initial
2. **Primary Regulation Citation:** 7 CFR 273.10(f)(5)
3. **Secondary Regulation Citation, if any:** N/A
4. **State:** Delaware
5. **Region:** Mid-Atlantic
6. **Regulatory Requirements:**

Lengthening certification periods. State agencies may lengthen a household's current certification period once it is established, as long as the total months of the certification period do not exceed 24 months for households in which all adult members are elderly or disabled, or 12 months for other households. If the State agency extends a household's certification period, it must advise the household of the new certification ending date with a notice containing the same information as the notice of eligibility set forth in paragraph (g)(1)(i)(A) of this section.

7. **Proposed Alternative Procedures:**

Beginning with April 2020 recertifications, the Delaware Division of Social Services (DSS) proposes to add 4 months to the certification period for all regular Supplemental Nutrition Assistance Program (SNAP) households in the entire state.

8. **Justification for Request:**

The health and well-being of Delaware's citizens is DSS' number one priority. Therefore, DSS is requesting that clients renewing their SNAP benefits are not put at undue risk to the COVID-19 pandemic. DSS believes that requiring clients who are renewing their SNAP benefits to congregate at eligibility offices with the expected increased number of new clients seeking benefits puts clients, DSS staff, and the community at an increased risk of exposure and transmission of the COVID-19 virus.

In addition, we have begun to experience staff shortages. On March 16, 2020, we had 50 staff members call out due to issues related to COVID-19 virus. There will be staff shortages due to school and child care closures as well as absenteeism as a result of state and federal public health guidance. Staff shortages will significantly impede our ability to meet the processing deadlines and service delivery standards required by state policy and federal regulations. Our partners with the Division of Medicaid and Medical Assistance (DMMA) is also seeking a waiver to extend the certification period to align with the Division of Social Services to streamline the process for clients and staff.

DSS is requesting that recipients with recertifications due April 2020 through June 2020 not be required to complete and return their recertification forms and be interviewed from July 2020 - October 2020. Household originally scheduled for recertification in

- April 2020 will be recertified in August 2020
- May 2020 will be recertified in September 2020
- June 2020 will be recertified in October 2020

DSS anticipates an approximate 15% increase in applications during this period in addition to the normal workload.

DSS feels that it will be impossible to meet the additional demands resulting from the COVID-19 pandemic without this waiver.

9. **Anticipated Impact on Households:**

This waiver enables SNAP recipients to maintain participation at their current level and reduces the exposure to congregate environments such as DSS offices, public transportation, and state service center environments to complete the renewal. DSS' goal is to minimize our contribution to the spread of the COVID-19 virus.

10. **Affected Caseload:**

This waiver will affect approximately 20,000 regular ongoing SNAP cases in Delaware.

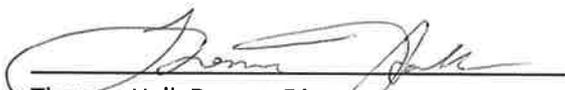
11. **Anticipated Implementation Date and Time Period for Which Waiver is Needed:**

This waiver will be implemented immediately upon approval and will affect certification periods for April 2020 to June 2020.

12. **Proposed Quality Control Review Procedures:**

Delaware requests that Quality Control provisions pertaining to issuance of benefits not be applied for the months in which this waiver is in effect.

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


Thomas Hall, Deputy Director
Delaware Division of Social Services

Email for transmission of Response: Thomas.Hall@delaware.gov

14. **Date of Request:**

March 16, 2020

WAIVER REQUEST

WAIVE PERIODIC REPORTING REQUIREMENTS

1. **Type of Request:** Initial
2. **Primary Regulation Citation:** 7CFR 273.12(A)(5)(iii)(B)
3. **Secondary Regulation Citation, if any:** N/A
4. **State:** Delaware
5. **Region:** Mid-Atlantic
6. **Regulatory Requirements:**

Submission of periodic reports by non-exempt households. Households that are certified for longer than 6 months, except those households described in §273.12(a)(5)(iii)(A), must file a periodic report between 4 months and 6 months, as required by the State agency. Households in which all adult members are elderly or have a disability with no earned income and are certified for periods lasting between 13 months and 24 months must file a periodic report once a year. In selecting a due date for the periodic report, the State agency must provide itself sufficient time to process reports so that households that have reported changes that will reduce or terminate benefits will receive adequate notice of action on the report in the first month of the new reporting period.

7. **Proposed Alternative Procedures:**

The Delaware Division of Social Services (DSS) proposes to waive six-month and twelve-month periodic reporting requirements, from March 2020 through June 2020.

8. **Justification for Request:**

The health and well-being of Delaware's citizens is DSS' number one priority. During this period of heightened concern due to the COVID-19, the closing of cases for failure to return or complete the periodic report would cause undue stress and hardship. This change will also complement the existing plan to change from the six-month periodic report to the six-month renewal effective July 2020.

In addition, we have begun to experience staff shortages. On March 16, 2020, we had 50 staff members call out due to issues related to COVID-19 virus. There will be staff shortages due to school and child care closures as well as absenteeism as a result of state and federal public health guidance. Staff shortages will significantly impede our ability to meet the processing deadlines and service delivery standards required by state policy and federal regulations. DSS anticipates an approximate 15% increase in applications during this period in addition to the normal workload.

DSS is requesting that recipients with periodic reports due March 2020 through June 2020 be waived from this reporting requirement. This change is in line with DSS' plan to switch back to the six-month renewal in July.

DSS feels that it will be impossible to meet the additional demands resulting from the COVID-19 pandemic without this waiver.

9. **Anticipated Impact on Households:**

This waiver enables SNAP recipients to maintain participation at their current level and to continue receiving SNAP benefits without interruption. If this waiver is not approved, households that fail to submit complete and timely periodic reports will face closure and will need to reapply for benefits. DSS' goal is to minimize our contribution to the spread of the COVID-19 virus and this would eliminate the need for existing clients to feel compelled to come into the office to expedite service.

10. **Affected Caseload:**

This waiver will affect approximately 23,000 regular ongoing SNAP cases in Delaware.

11. **Anticipated Implementation Date and Time Period for Which Waiver is Needed:**

This waiver will be implemented immediately upon approval and will affect the periodic reports due for March 2020 through June 2020.

12. **Proposed Quality Control Review Procedures:**

Delaware requests that Quality Control provisions pertaining to issuance of benefits not be applied for the months in which this waiver is in effect.

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

Thomas Hall, Deputy Director
Delaware Division of Social Services

Email for transmission of Response: Thomas.Hall@Delaware.Gov

14. **Date of Request:**

March 17, 2020