



Food and Nutrition
Service

1320 Braddock Place
Alexandria, VA
22314

April 22, 2020

RE: Supplemental Nutrition Assistance Program (SNAP) – Extending
Certification Periods and Adjusting Periodic Reports Due to Novel
Coronavirus (COVID-19) – Blanket Approval

Dear SNAP State Agencies,

As authorized by the Families First Coronavirus Response Act (FFCRA; P.L. 116-127), the Food and Nutrition Service (FNS) is permitting all interested State agencies to extend certification periods and accordingly adjust periodic report submission dates for ongoing SNAP households who are due for recertification or periodic reporting through June 30, 2020.

Under this adjustment, SNAP State agencies may adjust the certification provisions of section 3(f) of the Food and Nutrition Act of 2008 (FNA) and SNAP regulations at 7 CFR §273.10(f)(5) to extend certification periods for households scheduled to expire in March, April, May, and June 2020, for up to 6 months, until September, October, November, and December 2020, respectively.

State agencies may also adjust the periodic report requirements of section 6(c)(1)(D)(i) of the FNA, and SNAP regulations at 7 CFR §273.10(f)(1) and 7 CFR §273.12(a)(5)(iii)(B) for ongoing households for the same time period - March, April, May, and June 2020. If the state agency wishes to extend this adjustment beyond the initial period an extension request must be submitted to FNS for approval.

FNS has determined this adjustment to be consistent with what is practicable under actual conditions in areas affected by the COVID-19 Public Health Emergency.

This adjustment is contingent upon a State agency's compliance with the conditions and evaluation requirements detailed in the attached enclosure, which should be provided to FNS 45 days after expiration of the adjustment (August 14, 2020).

For State agencies that already requested and received approvals for certification period extensions through May 2020, this adjustment provides an additional month. If a State agency elects to implement this adjustment, it must notify its respective FNS Regional Office, and any State notifications will be relayed to the FNS Certification Policy Branch.

FNS is ready to provide technical assistance to State agencies as they seek to maintain operations and serve clients during the current Public Health Emergency. If you have any questions or need additional information, please contact your respective Regional Office representative.

Sincerely,

Sasha Gersten-Paal
Director
Program Development Division
Supplemental Nutrition Assistance Program

Enclosure

**EXTEND CERTIFICATION PERIODS AND ADJUST PERIODIC REPORT
REQUIREMENT ADJUSTMENT RESPONSE**

- 1. Statutory and regulatory citations:** Section 3(f) of the Food and Nutrition Act of 2008 (FNA) and 7 CFR 273.10(f)(5); section 6(c)(1)(D)(i) of the FNA and 7 CFR §273.10(f)(1) and 7 CFR §273.12(a)(5)(iii)(B).
- 2. Regulatory requirements:** Supplemental Nutrition Assistance (SNAP) regulations at 7 C.F.R. §273.10(f)(3)(i) require a minimum certification period of 6 months for most households. Regulations at 7 C.F.R. §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 between 4 and 6 months (typically in the sixth month) for households assigned to simplified reporting (SR), if the certification period exceeds 6 months.

SNAP regulations at 7 C.F.R. §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.
- 3. Description of alternative procedures:** The State agency will adjust the expiration for certification periods expiring in March, April, May and June 2020 and will extend the certification period of these households for up to 6 months until September, October, November and December 2020. The State will also adjust the periodic reporting requirement for households with a period report due between March through June 2020 and for households whose certification period is extended under this adjustment.
- 4. Action and reason for approval or denial:** The Food and Nutrition Service (FNS) recognizes the need for adjustments due to the COVID-19 Public Health Emergency. As authorized by the Families First Coronavirus Response Act (FFCRA) (P.L. 116-127), FNS' approval of this adjustment is based on the determination that the adjustment is consistent with what is practicable under actual conditions in areas affected by the COVID-19 Public Health Emergency. FNS is approving this adjustment for 4 months, effective March 1, 2020.
- 5. Conditions and reasons:** FNS is approving this adjustment subject to 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).
 - The State agency will submit a request to FNS for approval if it wishes to extend this adjustment beyond the initial period.
- 6. Evaluation Data Requirements:** Within 45 days of the expiration of this adjustment, the State agency must provide to FNS the data and analysis listed below required for evaluation:

- 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 adjustment procedure.
 - A narrative on the effect of providing timely and accurate benefits.
 - A narrative on the effect of any other aspects of the eligibility process including the ability to manage caseload growth and the impact on administrative efficiency.
7. **Expiration date:** June 30, 2020.
8. **Quality control procedures:** SNAP Quality Control will review cases subject to this adjustment against the terms of this adjustment and in accordance with FNS Handbook 310.