



March 30, 2020

Willie C. Taylor, Regional Administrator
USDA Food and Nutrition Service
Southeast Region
61 Forsyth Street, SW, Suite 8T36
Atlanta, Georgia 30303

Dear Mr. Taylor

Please find enclosed Georgia's request to waive key regulatory requirements associated with the recipient claim activity in the Supplemental Nutrition Assistance Program (SNAP).

On March 13, 2020, President Donald J. Trump declared a national State of Emergency due to the novel coronavirus pandemic (COVID-19). On March 14, 2020, Governor Brian P. Kemp of Georgia signed a Public Health State of Emergency to address the pandemic in Georgia. Due to the pandemic and its economic impact, Georgia has experienced a significant increase in the number of applications for benefits through its Supplemental Nutrition Assistance Program (SNAP). As a result, the Georgia Division of Family and Children Services (DFCS), which manages SNAP in Georgia, requires assistance in processing these applications to ensure its citizens have access to the food security and nutrition assistance provided through SNAP benefits.

To support the operations of DFCS, while maintaining its regulatory obligation to ensure the integrity of SNAP in Georgia, the Georgia Department of Human Services (DHS) Office of Inspector General (OIG) is requesting five waivers from the USDA Food and Nutrition Service for the duration of the COVID-19 pandemic. A summary of these requests is outlined below:

SUSPENSION OF NEW SNAP CLAIMS FOR 90-DAYS

Effective April 1, 2020, the state is requesting a waiver to suspend the establishment of any new SNAP claims. While all suspected non-fraud overpayment determinations and suspected intentional program violation referrals will be recorded, no action will be taken on such claims for 90-days. During this time, OIG resources will be reallocated to assist DFCS with processing the significant increase in SNAP applicants. OIG will also maintain a special team of veteran investigators, who will review all "administrative"¹ suspected intentional program violation referrals received during the 90-day

¹ Administrative SIPV referrals are high priority referrals that require immediate OIG attention and are submitted by DFCS senior leadership or quality control group.

suspension. These high-level referrals are submitted on cases that need immediate review by OIG.

SUSPENSION OF ALLOTMENT REDUCTION FOR 90 DAYS

Effective April 1, 2020, the state is requesting a waiver to suspend allotment reductions on all active SNAP cases with a claim. This action will ensure all SNAP households receive the maximum amount of their SNAP benefit during the pandemic. This action does not prevent a household from volunteering to pay their claim with a portion of their monthly allotment during the suspension, however, the reduction will not be automatic.

SUSPENSION OF MANUAL PAYMENTS

Effective April 1, 2020, the state is requesting a waiver to suspend manual payments from households not participating in SNAP who have an active SNAP claim for 90-days. During this pandemic, the state requests to follow the trends of other federal agencies by suspending enforcement activities, which will further assist families struggling to meet ongoing financial obligations during the pandemic.

Your assistance in this matter is greatly appreciated. Please contact S. Maurice D. Ingram at Maurice.Ingram@dhs.ga.gov if additional information is needed.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jon Anderson". The signature is fluid and cursive, with the first name "Jon" being more prominent than the last name "Anderson".

Jon A. Anderson,
Chief Deputy Division Director, Office of Family Independence
Georgia Division of Family and Children Services

STATE WAIVER REQUEST

- 1. Waiver Serial Number:** DHS-OIG-BIRU-2020-0001
- 2. Type of request:** Initial
- 3. Regulatory citation (s):** 7 CFR 273.18 (a), 7 CFR 273.18 (e)(3)(v), 7 CFR 273.18 (e)(5)
- 4. State:** Georgia
- 5. Region:** SERO
- 6. Regulatory requirements:** According to 7 CFR 273.18 (1), States must establish and collect any claim resulting from the overpayment or trafficking of benefits; 7 CFR 723.18 (e)(3)(v) requires that claim repayment is due no later than thirty (30) days after the date of initial household notification, and 7 CFR 273.18 (e)(5) claims will be considered delinquent if it is not paid by the due date and a satisfactory payment agreement has not been made, a payment arrangement has been established and a scheduled payment has not been made by the due date, and the claim will remain delinquent until payment is received in full, a satisfactory payment agreement is negotiated, or allotment reduction is invoked.
- 7. Proposed alternative procedures:** The Georgia Division of Family and Children Services (DFCS) is requesting a waiver to suspend all collection effectors, actions, and activities associated with Supplemental Nutrition Assistance Program overpayment claims for a period of ninety (90) days for all SNAP recipients who currently have an overpayment. Additionally, Georgia is seeking to suspend the establishment of claims to afford administrative flexibilities to effectively deploy State Benefit Integrity and Recovery staff to assist with increasing eligibility efforts for clients affected by the COVID-19 pandemic. The current increase in client caseload is exceeding the State's case management capacity.
- 8. Justification for request:** Georgia's request to suspend claim establishment and collections is based on the adverse effects of COVID-19 on current and former SNAP households living in Georgia, and that these effects are anticipated to continue for some time. Suspending claim establishment and collections activities will provide SNAP households access to their full financial benefit, and the food security and nutrition it ensures, during these unprecedented times in our state's history.
- 9. Anticipated impact on households and state agency operation:** In addition to providing financial relief from debt repayment, this waiver will ensure that more than \$250,000 SNAP households (our average monthly participation rate) in Georgia receive their full benefit amount during the height of the COVID-19 pandemic. This waiver will also allow the State to more effectively use to staff resources to concentrate on the timely processing of SNAP applications, ensuring continued program access during a time when Georgia families need to SNAP the most.
- 10. Quality control procedures:** The proposal does not affect quality control sampling or procedures.
- 11. Date of State agency's request:** March 30, 2020
- 12. Anticipated implementation date:** April 01, 2020

13. State agency contact (name/email/telephone):

Name: S. Maurice D. Ingram

Title: Senior Manager of Business Operations,
Benefit Integrity and Recovery Unit, Office of Inspector General

Email: Maurice.Ingram@dhs.ga.gov

14. Signature and title of the requesting official:

Jon Anderson, Chief Deputy Division Director
Office of Family Independence
Division and Family and Children Services