

WAIVER REQUEST

1. **Waiver Serial Number:**
2. **Type of Request:** Initial
3. **Primary Regulation Citations:** 7 CFR 273.2(b)(v)
4. **State:** GEORGIA
5. **FNS Region:** SERO
6. **Regulatory Requirements:** Federal regulations at 7CFR 273.2 (b) (v) states that a household has the right to immediately file an application as long as it contains the applicant's name and address and the signature of a responsible household member or the household's authorized representative. This regulation also states that regardless of the type of system the State agency uses (paper or electronic), that it must provide a means for households to immediately begin the application process with name, address and signature.
7. **Proposed Alternative Procedures:** Georgia is requesting to temporarily waive the requirement that households file an online application with name, address and signature and to have households complete all pages, including all required data fields of the online application, in their entirety when applying for SNAP benefits online for a five (5) month period.
 - Georgia Declared a State of Public Health Emergency on March 14, 2020.
 - Georgia temporarily closed its county office lobbies to the public on March 16, 2020 in response to the COVID-19 safety concerns to the public and to the staff.
 - Since the March 14th declaration, Online applications in Georgia have risen by 55%. See chart below:

Applications Received Daily

The number of applications received daily is double what was being seen prior to the emergency declaration for the COVID 19 pandemic.



- Applications are expected to continue to rise as the national public health emergency continues through the end of April.
- Online Applications will be completed by eligibility staff who are working remotely.
- FNS released guidance on March 26, 2020 allowing states flexibility in interview requirements to help to meet the demands of the volume of work caused by the COVID-19 response. Georgia would like to utilize the guidance to help timely processing of applications
- Customers frequently submit applications with little to no information, which causes the applications to appear as expedited. When case managers complete the interview, it is found that many of these applications are not truly expedited as the customers did not complete the income or resources sections.
- Incomplete applications let to multiple duplicate applications, duplicate case numbers and additional unnecessary data clean-up work for staff. When staff interview the applicant, they must address the multiple applications submitted.
- Requiring the household to complete the entire online application will allow the state to use all data match sources to accurately identify, verify and confirm eligibility for applicants who are both known and unknown as they enter information in the Gateway system. This process will confirm the accuracy of applications received during initial registration and processing of cases. The projected time to process an incomplete application due to the remote work environment such as workers having no scanner, printer and other equipment may take more time to process applications and cases may be processed in error. Collecting and checking all data elements during the online application process will ensure all data

elements and required verification for eligibility determinations are reviewed and confirmed during registration and processing of cases if staff encounter issues with scanners and printers remotely.

This proposed alternative to application processing procedures will assist the State in focusing its effort on processing applications accurately and timely as the volume of online applications increase due to the COVID-19 pandemic.

Georgia would like to require the following data elements to be mandatory fields effective April 11, 2020 through the end of the COVID-19 crisis:

- Social Security Number
- Date of Birth
- Gender
- Resources
- Income
- Expenses

The above elements will allow a more complete application and will ensure timely processing of the increase of applications.

8. **Justification for Request:** Georgia is in a Public Health State of Emergency due to the (COVID-19-Coronavirus Pandemic). The (COVID-19-Coronavirus disease) is a respiratory illness that can spread from person to person, between persons who are in close contact with each other.

As of March 30, 2020, the Georgia Department of Public Health reports there are 2809 confirmed COVID-19 cases, 707 hospitalizations and 87 deaths in Georgia. This virus has caused and will continue to cause many agencies and companies to shut down. The growing number of businesses and schools closing has increased the number of SNAP applications submitted online.

Schools have also closed and are requiring students to learn virtually from home, which affects the household's ability to seek, accept and maintain employment during these times of uncertainty.

Effective 3/19/20, the state closed its lobbies to the public to limit the spread of COVID-19 and to protect both staff and the public.

The state wants to focus its effort on processing applications timely and accurately as the volume of online applications continue to increase due to the COVID-19 pandemic.

This waiver will support the operations of the agency by helping staff to quickly get through the application by checking and validating the data elements provided and will speed up the required interview process. More staff are teleworking and are having challenges to remote work environment changes such as no scanners or printers. Collecting and validating data through the

eligibility system and having clients to apply and upload documents online will assist staff with these technology challenges as they telework and work from a remote location.

9. **Anticipated Impact on Households:** The waiver applies to all SNAP households in the state and will improve program administration by helping the State to meet timeliness and accuracy standards for the anticipated increased in online applications. Using automation to validate client information and speed up application registration and processing will save time on the back end validation efforts and potentially reduce fraud.
10. **Affected Caseload:** As of February 2020, Georgia has an average caseload of 601,075 cases. Based on the number of online SNAP applications received each week, the state anticipates that about 60 to 70 percent of the caseload will be impacted by this waiver.
11. **Anticipated Implementation Date:** This proposed waiver would become effective immediately upon approval from the Food and Nutrition Service. Georgia would implement this waiver on April 11, 2020.
12. **Proposed Quality control Procedures:** The proposal does not affect quality control sampling or review procedures. Cases will be reviewed using the standard review procedures contained in the FNS Handbook 310.

13. Name, title, and email of requesting official:

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Date of request: March 30, 2020

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