

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** Initial due to COVID-19 emergency
3. **Statutory citation:** Families First Coronavirus Response Act
4. **Regulatory citation:** 7 CFR 273.2(f)(9)
5. **State:** Iowa
6. **Region:** MWRO
7. **Regulatory requirements:**

The Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.2(f)(9) state the following regarding mandatory use of the Income and eligibility verification system (IEVS):

 - (i) The State agency must obtain information through IEVS in accordance with procedures specified in §272.8 of this chapter and use it to verify the eligibility and benefit levels of applicants and participating households.
 - (ii) The State agency must access data through the IEVS in accordance with the disclosure safeguards and data exchange agreements required by part 272.
 - (iii) The State agency shall take action, including proper notices to households, to terminate, deny, or reduce benefits based on information obtain through the IEVS which is considered verified upon receipt. This information is social security and SSI benefit information obtained from SSA, and TANF benefit information and UIB information obtained from the agencies administering those programs. If the State agency has information that the IEVS-obtained information about a particular household is questionable, this information shall be considered unverified upon receipt and the State agency shall take action as specified in paragraph (f)(9)(iv) of this section.
 - (iv) Except as noted in this paragraph, prior to taking action to terminate, deny, or reduce benefits based on information obtained through the IEVS which is considered unverified upon receipt, State agencies shall independently verify the information. Such unverified information is unearned income information from IRS, wage information from SSA and SWICAs, and questionable IEVS information discussed in paragraph (f)(9)(iii) of this section. Independent verification shall include verification of the amount of the asset or income involved, whether the household actually has or had access to such asset or income such that it would be countable income or resources for SNAP purposes, and the period during which such access

occurred. Except with respect to unearned income information from IRS, if a State agency has information which indicates that independent verification is not needed, such verification is not required.

(v) The State agency shall obtain independent verification of unverified information obtained from IEVS by means of contacting the household and/or the appropriate income, resource or benefit source. If the State agency chooses to contact the household, it must do so in writing, informing the household of the information which it has received, and requesting that the household respond within 10 days. If the household fails to respond in a timely manner, the State agency shall send it a notice of adverse action as specified in §273.13. The State agency may contact the appropriate source by the means best suited to the situation. When the household or appropriate source provides the independent verification, the State agency shall properly notify the household of the action it intends to take and provide the household with an opportunity to request a fair hearing prior to any adverse action.

8. Description of alternative procedures:

Iowa is requesting a waiver of the regulatory requirements so that Iowa can disregard alerts generated through the IEVS match and focus on new SNAP applications as they continue to be received. While the number of applications increases, the current workforce is at risk of becoming unsteady. Minimizing the number of automatic alerts that need to be worked is crucial.

Iowa will continue to check all databases at the time of approval. This includes information regarding social security benefits, unemployment and wage information. After initial approval of SNAP benefits, Iowa requests to suspend the use of IEVS so that staff time can be spent on getting necessary benefits to households during the increased demand during the health crisis.

9. Justification for request:

This request is justified pursuant to the Families First Coronavirus Response Act and 7 CFR 272.3(c) (1)(ii) which permits FNS to authorize waivers that result in a more effective and efficient administration of the program. The approval of this waiver will ensure Iowa can respond quickly to the increase in demand for SNAP benefits as a result of this health crisis. Iowa has seen a dramatic increase in applications since the onset of the pandemic.

On January 31, 2020, the International Health Regulations Emergency Committee of the World Health Organization declared the outbreak of COVID-19 a public health emergency of international concern as well as Health and Human Services Secretary, Alex M. Azar II, declared a public health emergency for the United States. On March 13, 2020, President Trump declared a national state of emergency over the COVID-19 pandemic. In addition, the Governor of Iowa, Kim Reynolds, declared a state of

emergency of the entire state of Iowa on March 17, 2020 to protect the well-being of the citizens of Iowa from the dangerous effects of COVID-19.

Approval of this waiver will allow Iowa to focus on providing necessary food benefits to needy Iowans. All databases will be accessed prior to approval and applicants will be reminded the importance of their requirement to report if income exceeds their reporting threshold.

10. Anticipated impact on households and State agency operations:

This waiver will allow county agencies to focus on new SNAP applications as they continue to be received at a record pace. Since the onset of the pandemic, we have been receiving an average of over 1,000 applications each day.

11. Caseload information:

As of February 2020, Iowa was serving 144,817 SNAP households and 296,438 individuals. We do not yet have the numbers for March, but applications have increased 86% over the same time period last year.

12. Anticipated implementation date and time period for which waiver is needed:

Iowa requests approval to implement this immediately, and through June 2020. If Iowa is still under a state of emergency, additional extensions of this waiver will be requested as necessary.

13. Proposed quality control review procedures:

Iowa requests hold-harmless provisions for all pandemic-related waivers approved by USDA.

14. Signature and title of requesting official:

e-signed: *Janee Harvey*

Name: Janee Harvey

Title: Division Administrator, Adult, Children and Family Services

Email for transmission of response: Jharvey1@dhs.state.ia.us

15. Date of request:

4/13/20

16. State agency staff contact (name/email/telephone):

Food Assistance Program Manager: Kari Lind, klind@dhs.state.ia.us, 515-281-7000

17. Regional office contact person (to be completed by FNS regional office):