WAIVER REQUEST

CERTIFICATION PERIODS

1. **Type of Request:** Initial

2. **Primary Regulation Citation:** 7CFR 273.10(f)(5)

3. **Secondary Regulation Citation, if any:** N/A

4. **State:** Louisiana

5. **Region:** Southwest

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 Louisiana Department of Children and Family Services (DCFS) proposes to add three months to the certification period for all regular Supplemental Nutrition Assistance Program (SNAP) households in the entire state.

8. **Justification for Request:** Louisiana residents have been required to participate in social distancing, remain at home, and are out of work due to the COVID-19 pandemic. No DCFS offices in the state are open to the public. Staff have been mandated to work remotely to the greatest extent possible. Many areas of the state are rural and internet service is not available in all areas of the state, and this prevents staff from being able to work remotely and also limits SNAP clients' ability to submit an application for assistance online. Many SNAP clients are reluctant to go to a parish office, library, or community partner to get assistance with reapplying online due to the fear of being infected by the deadly COVID-19 outbreak. Many staff must remain at home due to all schools in the state being closed through at least April 13, 2020. In addition, some staff are ill or caring for ill family members and are unable to work. Adding three months to the certification period for all households statewide will keep the

workload consistent throughout the year. This is similar to what Louisiana DCFS has done in past DSNAPs. SNAP recipients with certification periods ending in April 2020 and May 2020 will not be required to complete and return their recertification forms or be interviewed during this period of reducing staff capacity due to remote work. Overall DCFS staffing is less than normal capacity as many agency staff are unable to work due to child care issues related to school closures as a result of the COVID-19 pandemic. DCFS anticipates receiving significantly more new SNAP applications statewide due to thousands of people being unable to work during this crisis. The SNAP applications received during the week of March 16th are nearly four times the number of SNAP applications received during the week of March 9th. This waiver will eliminate the hardship that processing recertifications would create for the local office staff who will be processing the sharp influx of additional applications expected and the hardship for Louisiana residents who are in very difficult situations. This waiver would also eliminate the requirement for clients to reapply for benefits after their cases are closed for not timely reapplying.

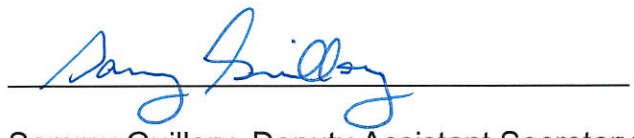
9. **Anticipated Impact on Households:** This waiver enables recipients to maintain participation at their current level and not suffer hardship due to delayed recertification of benefits.

10. **Affected Caseload:** This waiver will affect approximately 372,273 Regular SNAP cases in Louisiana.

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 through March 2022.

12. **Proposed Quality Control Review Procedures:** The Louisiana DCFS 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:**



Sammy Guillory, Deputy Assistant Secretary
Louisiana Department of Children and Family Services

14. **Date of Request:** March 20, 2020

WAIVER REQUEST

ELIMINATION OF SIMPLIFIED REPORTING REQUIREMENTS

1. **Type of Request:** Initial

2. **Primary Regulation Citation:** 7 CFR 273.12(a)

3. **Secondary Regulation Citation, if any:**

4. **State:** Louisiana

5. **Region:** Southwest

6. **Regulatory Requirements:** Regulations offer State agencies the option of requiring households that are assigned six-month or longer certification periods to only report changes in the amount of monthly income that result in their gross monthly income exceeding 130 percent of the monthly poverty income guideline for their household size. Section 4105 of the Food and Nutrition Act of 2008 (also known as the Farm Bill of 2008) extends that option to include all households except those that are statutorily exempt from periodic reporting. Such households that are certified for longer than six months are required to submit an interim report at the mid-point of their certification period.

7. **Proposed Alternative Procedures:** Louisiana proposes to eliminate the requirement for the submission of interim reports by Simplified Reporting households whose interim reports are due in the months of April 2020, May 2020, and June 2020, statewide.

   The only reporting requirement for these households prior to the end of their certification period will be to report if the household income increases and exceeds 130 percent of the gross income limit applicable to their household size.

8. **Justification for Request:** Louisiana residents have been required to participate in social distancing, remain at home, and are out of work due to the COVID-19 pandemic. No DCFS offices in the state are open to the public. Staff have been mandated to work remotely to the greatest extent possible. Many areas of the state are rural and internet service is not available in all areas of the state, and this prevents staff from being able to work remotely and also limits SNAP clients' ability to submit an application for assistance or an interim report (Simplified Report) online. Many clients are reluctant to go to a parish office, library, or community partner to get assistance with completing a Simplified Report in person or online due to the fear of being infected by the deadly COVID-19 outbreak. Many staff must remain at home due to all schools in the state being closed through at least April 13, 2020. In addition, some staff are ill or caring for ill family members and unable to work. Overall DCFS staffing in all local offices is less than normal capacity as many agency staff are unable to work due to

child care issues related to school closures as a result of the COVID-19 pandemic. Considering all of the above, it may be difficult for these households to receive and return completed Simplified Report forms in a timely manner. Failure to provide complete reports by established deadlines normally results in case closure. Implementation of this waiver will prevent case closures due to failure to submit complete and timely interim reports. DCFS anticipates receiving significantly more new SNAP applications statewide due to thousands of people being unable to work during this crisis. The number of SNAP applications received during the week of March 16th are nearly four times the number of SNAP applications received during the week of March 9th. This waiver will eliminate the hardship that processing April 2020, May 2020, and June 2020 Simplified Reports would create for the local office staff who will be processing significant influx of additional SNAP applications and the hardship for Louisiana residents who are in very difficult situations. This waiver would also eliminate the requirement for clients to reapply for benefits after their cases are closed for not timely submitting interim reports.

9. **Anticipated Impact on Households:** Implementation of this waiver will prevent the additional hardship that case closures would impose on these vulnerable households. This waiver will enable these households to continue receiving SNAP benefits without interruption. If this waiver is not approved, households that fail to submit complete and timely interim reports will face case closures and the necessity reapplying for SNAP benefits when social distancing is being required.

10. **Affected Caseload:** This waiver will affect approximately 372,273 Regular SNAP cases statewide.

11. **Anticipated Implementation Date and Time Period for Which Waiver is Needed:** This waiver is requested to be effective immediately upon approval and will be effective for the months of April 2020, May 2020, and June 2020.

12. **Proposed Quality Control Review Procedures:** The Louisiana DCFS requests that the State be held harmless for any Quality Control errors associated with changes in household circumstances that would have been reported on the interim reports, other than changes in household income that results in gross income exceeding 130 percent of the gross income limit applicable to the household size.

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

Sammy Guillory, Deputy Assistant Secretary
Louisiana Department of Children and Family Services

14. **Date of Request:** March 20, 2020