

## **REQUEST TO ADJUST INITIAL CERTIFICATION AND RECERTIFICATION INTERVIEW RESPONSE**

- 1. Adjustment serial number:**
- 2. Type of request:** Initial
- 3. Regulatory citation:** 7 CFR 273.2(a)(2), 273.2(e), and 273.14(b)(3)
- 4. State:** Louisiana
- 5. Region:** Southwest
- 6. Regulatory requirements:** Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.2(a)(2) requires that the application process includes an interview.

Regulations at 7 CFR 273.2(e) requires that the State agency interview households for eligibility before certifying.

Regulations at 7 CFR 273.14(b)(3) requires that State agencies interview households as part of the recertification process.

- 7. Description of alternative procedures:** The State will not be required to interview a household at initial application or recertification provided that the applicant's identity has been verified and all mandatory verifications have taken place. The State will be required to contact the household if any information on the application is questionable and cannot be verified. The State will make every attempt to verify household circumstances through data matching and mailing or uploading verifications to the State system.
- 8. Action and reason for approval or denial:**

Louisiana is requesting the waive interviews for the month of September 2020 due to the COVID-19 pandemic and due to the devastation Louisiana suffered as a result of Hurricane Laura. Waiving interviews would assist clients applying for SNAP benefits since many residents evacuated their homes due to the storm and are not home and are unable to conduct their interview. Mail service has been temporarily suspended for certain areas of the state, therefore they will not be able to get their interview appointment letters. Most staff will be processing DSNAP applications, therefore it will be easier for the remaining staff to process applications.
- 9. Legislative basis for action:** Approval is based on the Families First Coronavirus Response Act (P.L. 116-127), which allows FNS to approve adjustments to issuance methods, application and reporting requirements to be consistent with what is practicable under actual conditions in areas affected by the COVID-19 pandemic.

**10. Conditions and reasons:**

**Evaluation Data Requirements**

The State agency must provide to FNS the data and analysis listed below required for evaluation of this adjustment.

- 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; and
- A narrative on the effect of any other aspects of the eligibility process including the ability to manage staff caseload growth and the impact on administrative efficiency.

**11. Expiration date:** September 30, 2020

**12. Limitation, if any, on approval:** Approval of this adjustment is limited to the State SNAP agency.

**13. Quality control procedures:** No special Quality Control (QC) procedures are required for cases subject to the provisions of this adjustment. Cases should be reviewed using standard review procedures contained in the FNS Handbook 310.

**14. Anticipated implementation date (*notify FNS if actual date differs*):** Upon receipt of approval.

## SNAP COVID Adjustment Request and Transition Plan Summary

*(The document should be no more than one page and is meant to be a high level summary for reference).*

*In order to receive approval, a State must demonstrate that the adjustments continue to be warranted given the current circumstances in the State and provide data to support extension.*

### **State Agency and Region:**

Louisiana Department of Children and Family Services, Southwest Region

### **What Adjustment(s) is the State Requesting** *(e.g. core verification and interview adjustment)*

Louisiana is requesting the waive interviews for the month of September 2020 due to the COVID-19 pandemic and due to the devastation Louisiana suffered as a result of Hurricane Laura. Waiving interviews would assist clients applying for SNAP benefits since many residents evacuated their homes due to the storm and are not home and are unable to conduct their interview. Mail service has been temporarily suspended for certain areas of the state, therefore they will not be able to get their interview appointment letters. Most staff will be processing DSNAP applications, therefore it will be easier for the remaining staff to process applications.

**Demonstrated Need for Extension of the Adjustment** *(This should be based on operational data provided by the State, not a narrative. Data to support requests would be expected to include data on including lessened workforce capacity, increased recertifications, and/or increased case actions, among other supporting information.)*

Hurricane Laura passed through the entire state causing major damage and leaving more than 25% of the entire state without power and many without water. DCFS handles evacuation and shelter operations in addition to DSNAP and many staff have been activated to emergency services. With many staff working emergency duties, there will be significantly less staff to handle regular SNAP applications.

**How Does the State Plan to Transition to the New Normal** *(The State should provide the region with a detailed plan that shows how and when the State will return to its "new normal" -- that is a steady operation that may in fact entail higher caseloads than experienced pre-Covid -- including a phased in approach.*

By eliminating interviews in September, this allows staff who are not working DSNAP to process SNAP applications without the need to mail an appointment letter to households who have evacuated and are unable to receive it.