

ADJUSTMENT OF INITIAL CERTIFICATION AND RECERTIFICATION INTERVIEW RESPONSE

1. **Waiver serial number:** N/A
2. **Type of request:** Extension
3. **Regulatory citation:** 7 C.F.R. 273.2(a)(2), 273.2(e), and 273.14(b)(3)
4. **State:** North Carolina
5. **FNS Region:** SERO

Regulatory requirements: Supplemental Nutrition Assistance Program (SNAP) regulations at 7 C.F.R. 273.2(a)(2) requires that the application process include an interview. Regulations at 7 C.F.R. 273.2(e) requires that the State agency interview households for eligibility before certifying. Regulations at 7 C.F.R. 273.14(b)(3) requires that State agencies interview households as part of the recertification process

6. **Description of alternative procedures:** The NC DHHS will not be required to interview a household at initial application or recertification, provided that the applicant's identity has been verified and all other mandatory verifications in 7 C.F.R. 273.2(f)(1) have been completed. 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.
7. **Justification for Request:** The first positive test of the COVID-19, was on March 3, 2020, with additional cases rapidly emerging in North Carolina. As of August 7, 2020, North Carolina, has experienced 132,812 lab-confirmed cases of COVID-19 with expanded testing and increased social contact this number is expected to continue to increase for the foreseeable future.

North Carolina is requesting an extension to waive Interview requirements as cited in 7 C.F.R. 273.2(a)(2), 273.2(e), and 273.14(b)(3) that requires an interview for application certifications, and recertifications. The negative effect of COVID-19 on North Carolina's economy has resulted in a significant increase in the number of FNS applications received. The significant increase in FNS applications has created an overwhelming demand on the agency staff. The extension of the interview waiver will continue to reduce the burden on county staff and more importantly allow faster processing of applications providing much needed benefits to applicants in a timely manner.

North Carolina Executive Order 116 Declaration of State of Emergency issued March 10th, 2020 in order until rescinded. Executive order 116 which declared the State of Emergency is still in effect and will at minimum remain in effect through Phase 2 of COVID-19 pandemic. North Carolina's "Safer At Home Phase 2" was extended through Sept. 11, 2020, due to increased number of COVID-19 cases. Phase 2 consist of restrictions for vulnerable populations with encouragement to continue practicing physical distancing, allowing 50 percent capacity, with distancing and cleaning requirements at restaurants, while some other places of business and places remain close.

FNS Enrollment has increased by nearly 150,000 households and 290,433 recipients Statewide since the first week of March 2020 through the week ending on 8/2/2020. This is a 25% increase in enrollment over a 5-month period. Between 3/1/2020 and 8/8/2020, NC has received 271,876 applications for Food and Nutrition Services, as compared to 244,476 (a 9% increase). The increase in the number of applications now results in an

increase in the number of recertifications. There are 126,356 six-months recertifications due September 2020 compared to 84,341 six-month recertifications in September 2019 which is a 49.82% increase.

Many North Carolina county department of social services have reduced the number of staff allowed to work in the local agency to increase and maintain proper social distancing. As a result, 86% of our local county DSS offices continue to limit public interactions or are open for appointments only, restricting in-person interaction for customers applying for or recertifying their Food and Nutrition Services (FNS) benefits and a number of North Carolina county social services offices agency staff do not have agency cell phones to contact clients for interviews.

The extension of Phase 2 has also impacted the public school's return to the classroom. Three plans were put in place – Plan A, all students return to the classroom, Plan B, limit student density in facilities to no greater than 50% occupancy and Plan C - no students in school facilities. Over 50% of NC school districts selected Plan C and will have school age children attending school remotely which means more children at home and more demands of parent's time, both staff and clients. This will negatively impact time availability for FNS workers and program requirements such as to complete telephone interviews.

Counties are anticipating reductions in workforce which will be difficult with the recertifications and applications being increased and federal unemployment benefits ending.

North Carolina FNS is requesting the original waiver be extended for all applications and recertifications requiring an interview through September 30, 2020.

8 . Conditions of approval: FNS is approving this adjustment subject to the following conditions:

- The adjustment is limited to those households for which mandatory verifications have been completed and the applicant's identity has been verified;
- The State agency will ensure that sufficient controls in their policy and automation are in place to implement the terms of this adjustment correctly;
- The State agency will contact the household if information in the application that is required to be verified under 273.2(f)(1) is questionable and cannot be verified through a data match;
- The State agency has the capacity to provide to FNS the data required for evaluation of the caseload for which the State agency has adjusted the interview requirements.
- NC plan to transition to the New Normal is as follows:
 - North Carolina will consider normal operations when the following conditions are met:
 - Governor moves the state into Phase 3.
 - All 100 Department of Social Services (DSS) local offices are open for in-person interactions.
 - All 100 DSS agencies have no barriers to assisting the public while maintaining appropriate social distancing.
 - Phase 3 detailed transitional plans will be required of all 100 county DSS agencies within 14 days of the state entering into Phase 3 and must contain a plan on how the local agency will address the following issues:
 - How will counties safely maintain social distancing with in-person interactions?
 - If city or county ordinance exist, how will the local agency accommodate those requirements?

- How will counties ensure they will maintain appropriate levels of staff to maintain timely services?
- Ensure all staff are equipped with Personal Protective Equipment (PPE) such as masks, gloves and hand sanitizer.
- Provide verification that all staff have been trained on proper social distancing protocols.
- Explain in detail any changes to service that have been taken to maintain level of service while practicing social distancing.
- Operational Support Team (OST) staff will assist DSS agencies with the development of a transition plan.
- Plans submitted by local agencies for return to in-person interaction will be reviewed by Department of Health and Human Services (DHHS).
- Based on the county established timelines for reaching their new normal, the DHHS will develop a statewide schedule to monitor the implementation or transition and provide additional support to the counties as needed to ensure a successful transition.

9. Expiration Date: September 30, 2020

10. 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.

11. Name and Title of Requesting Official:



David Locklear, Deputy Director
Economic and Family Services

12. Date of Request: August 10, 2020

13. State Agency Staff Contact:

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