

SNAP COVID Adjustment Request and Transition Plan Summary

State Agency and Region: Pennsylvania MARO

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

Periodic Report Flexibility for Non-Extended Recertification Cases

Suspend in-person application and verification submissions

Demonstrated Need for Extension of the Adjustment

Renewals Due

Month	Budgets	Month	Budgets
Aug-20	52,920	Aug-19	44,192
Sep-20	87,571	Sep-19	44,020
Oct-20	92,927	Oct-19	53,156
Nov-20	87,595	Nov-19	48,946
Dec-20	93,182	Dec-19	53,802

How Does the State Plan to Transition to the New Normal

Pennsylvania will conduct renewals for households whose renewals were originally scheduled for March and were extended to September. Renewals due in the month of September will receive an interim report. Pennsylvania is requesting this adjustment for September through December to address the significant number of recertifications due in those months demonstrated above. The state is requesting this adjustment as an option provided by FNS as it will provide the ability to rebalance the caseload and is more sustainable than the previously approved *Core Verification and Interview Requirements Waiver*.

By allowing Pennsylvania this flexibility, the state will be optimally positioned to address both an anticipated increase in applications due to the expiration of the Federal Pandemic Unemployment Compensation as well as the increase in renewals due for completion. Approval will also allow for rebalancing of the caseload to ensure normal processing going forward and will ensure benefits are not lost due to the state's inability to address the increase workload with the goal of returning to normal processing after the first of the year.

If the state experiences a surge in COVID-19 cases or if applications rise precipitously, the state reserves the right to amend this plan.

Pennsylvania is also requesting to suspend in-person collection of applications and verification documents from households. Pennsylvania has drop boxes available at all offices for applicants and recipients so that families that do not have access to phone or internet can complete their document submissions. PA is currently evaluating the potential of having eligibility workers schedule time at local shelters or other areas where applicants/ recipients who may not have phone or internet access may gather in order to provide additional access points.

STATE WAIVER EXTENSION REQUEST

1. **Waiver Serial Number:**
2. **Type of request:** Initial
3. **Regulatory citation:** 7 CFR 273.14(b)(2) through (4)
4. **State:** Pennsylvania
5. **Region:** MARO
6. **Regulatory requirements:** Regulations at 7 CFR 273.14(b)(2) require that State agencies develop an application to be used by households when applying for recertification.

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

Regulations at 7 CFR 273.14(b)(4) require State agencies to verify household circumstances as part of the recertification process.

7. **Proposed alternative procedures:** Under this adjustment, Pennsylvania will use periodic report procedures to establish a new certification period for certain households due to recertify. This adjustment will only be applied to households that have not had their certification periods previously extended through other adjustments. In processing these cases, the State agency will follow up with any households that have unclear or questionable circumstances. Consistent with current periodic report procedures, Pennsylvania will not interview households that do not have unclear or questionable circumstances.

Pennsylvania will conduct renewals for households whose renewals were originally scheduled for March and were extended to September. Renewals due in the month of September will receive an interim report. Pennsylvania is requesting this adjustment for September through December to address the significant number of recertifications due in those months.

8. **Justification for request:** This request is justified pursuant to the Families First Coronavirus Response Act which provided for additional flexibilities for states as needed in response to the health emergency 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 and in conjunction with the Families First Coronavirus Response Act, which allows for waivers in response to the current COVID-19 pandemic. The approval of this waiver would allow DHS to ensure households continue to receive

their SNAP benefits during this pandemic while transitioning back to a normal caseload distribution.

DHS currently has approximately 87,500 SNAP recertifications due in September. While the recertification workload is double what normally would be required in September, October, November and December, there is no additional staffing available to assist with the increased workload. Though recertifications are generated systematically with minimal action by County Assistance Office (CAO) staff, when the items and pending information are provided to the CAO, the onsite staff must take the time to scan any submitted documentation into the Client Information System's (CIS) Imaging repository, then classify the items and notify the appropriate caseworker to take any necessary actions on the case. A majority of CAO staff are currently teleworking, per the Governor's mandate and in conjunction with the Centers for Disease Control and Prevention (CDC) and Pennsylvania's Department of Health (DOH) social distancing guidelines, leaving minimal onsite staff at the CAO. These staff remain at the CAO to complete the tasks necessary for the CAO to complete its normal duties. These tasks include monitoring CAO phone lines and messaging systems, opening mail and scanning documents into CIS for applications and other reported changes, registering and scanning any hard copy applications received in the office, and printing Electronic Benefits Transfer (EBT) cards and overnight mailing the card to households that are determined eligible for Expedited SNAP benefits so that these households are still able to access their benefits within 5 calendar days.

In addition to the SNAP applications and the related tasks previously discussed in this waiver, CAO staff must also work to process Temporary Assistance for Needy Families (TANF) and Medical Assistance (MA) applications and the similar tasks necessary for processing those applications. Pennsylvania will also open the application season for the Low-Income Home Energy Assistance Program (LIHEAP) with pre-applications being mailed for processing on September 28, 2020. While there are some temporary staff hired to address these applications, any applications for cases that also received SNAP, TANF or MA must be addressed by fulltime eligibility caseworkers and cannot by labor contract be completed by temporary staff. In addition, funding for temporary staffing is through the LIHEAP grant and cannot be utilized for other benefits. Pennsylvania also typically experiences an increase in MA applications during open enrollment which begins October 15, 2020. The state will be transitioning to a new state-based exchange which will launch on November 1, 2020. We anticipate increased applications due to the publicity surrounding the launch of the state-based exchange as well as the increase in unemployment further straining the resources available to address recertifications. The combined workload of handling applications and the duties related to processing these applications in tandem with other duties the onsite CAO staff must complete means that recertifications may not be able to be processed in a timely manner, which could result in eligible households losing benefits and having to be reauthorized, which creates additional work for the CAOs. This creates an ever-expanding cycle of additional work that CAOs will be unlikely to fully recover from until months after they have returned to full onsite staffing. It also is likely to result in higher churn rates for SNAP households during a period where SNAP benefits are a critical resource for these families.

- 9. Caseload information, including percent of caseload and description of population expected to be affected by this waiver:** This waiver will prevent benefits from ending during this health crisis because offices are closed to the public and minimal staffing availability or teleworking caseworkers were unable to interview and recertify double the normal amount SNAP households.
- 10. Anticipated impact on households and State agency operations:** Pennsylvania currently serves 1,031,087 SNAP households as of June 2020. For September 2020, there are currently 87,571 recertifications due.
- 11. Anticipated implementation date and time period for which waiver is needed (please indicate if the waiver approval is needed to make system adjustments):** Waiver approval is needed in order to make system adjustments. Pennsylvania is requesting this waiver effective August 18, 2020 through December 31, 2020.
- 12. Proposed quality control review procedures:** No special QC procedures are required for cases subject to the provisions of this waiver.
- 13. Name, title, and email of requesting official:**
Name: Elizabeth M. Tilahun

Title: Deputy Secretary for Income Maintenance

Email: etilahun@pa.gov
- 14. Date of request:** August 14, 2020
- 15. State agency staff contact:**
Name: Cathy Buhrig

Title: Director, Bureau of Policy, Pennsylvania Department of Human Services, Office of Income Maintenance

Email: cbuhrig@pa.gov
- 16. Regional Office contact person (to be completed by FNS regional office):** Katrina Nelson