



HENRY McMASTER, GOVERNOR
MICHAEL LEACH, STATE DIRECTOR

April 9, 2020

Willie C. Taylor, Regional Administrator
USDA Food and Nutrition Service
Southeast Region
61 Forsyth Street SW, Room 8T36
Atlanta, Georgia 30303

Dear Mr. Taylor:

Please find enclosed South Carolina's request to waive the requirement for students to be employed for a minimum of 20 hours per week under the authority of Section 2302(a)(2) of the Families First Coronavirus Response Act (P.L. 116-127). This waiver is necessary in light of conditions in South Carolina due to the effects of the COVID-19 Public Health Emergency.

On March 13, 2020, Governor Henry McMaster declared a State of Emergency based on a determination that the 2019 Novel Coronavirus (COVID-19) poses an actual or imminent public health emergency for the State of South Carolina. With this emergency declaration, South Carolina is requesting to waive student employment requirements for SNAP eligibility for a period of one hundred and twenty (120) days beginning April 1, 2020.

If you have any questions or need additional information, please contact Katherine Hayden at (803) 898-1946 or Katherine.hayden@dss.sc.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Amber Gillum'.

Amber Gillum
Deputy State Director
Office of Economic Services

Enclosure

cc: Eugene Malveaux, SNAP Branch Chief, FNS SERO

STATE WAIVER REQUEST
Student Work Hours

1. **Type of Request:** Initial
2. **Primary Citation:** 7 CFR 273.5(b)(5)
3. **State:** South Carolina
4. **FNS Region:** SERO
5. **Act and Regulatory Requirements:** Section 273.5(b)(5) of the Food and Nutrition Act requires an individual that is enrolled at least half-time in an institution of higher education “be employed for a minimum of 20 hours per week and be paid for such employment or, if self-employed, be employed for a minimum of 20 hours per week and receiving weekly earnings at least equal to the Federal minimum wage multiplied by 20 hours.”
6. **Proposed Alternative Procedures:** South Carolina Department of Social Services (DSS) is requesting a waiver to suspend the requirement to be employed for a minimum of 20 hours per week and be paid for such employment or, if self-employed, be employed for a minimum of 20 hours per week and receiving weekly earnings at least equal to the Federal minimum wage multiplied by 20 hours. This waiver is being requested for the months of April 2020 through July 2020.
7. **Justification for Request:** The spread of the COVID-19 virus has resulted in numerous retailers reducing hours of operation or temporarily ceasing business. In addition, all schools including colleges and universities have suspended classes and/or moved all classes online through at least April 30, 2020. The closure of schools and businesses has made it impossible for many of the students to work the required 20 hours per week, due to no fault of their own.

Waiving the regulation that requires the student to be employed or self-employed for a minimum of 20 hours per week will allow these students to remain eligible during the pandemic.
8. **Anticipated Impact on Households:** Allowing the students to retain their eligible status during the pandemic lessens the impact on those students that would otherwise be adversely affected by the COVID-19 virus who are temporarily unable to work the 20 hours per week required to gain and/or maintain eligibility. Students that were previously ineligible for SNAP may meet eligibility requirements during the pandemic with the waiver to temporarily suspend the work requirement.
9. **Affected Caseload:** South Carolina has approximately 1,863 ineligible students that would potentially be eligible for SNAP due to this waiver. These students have been excluded as ineligible students in active SNAP households. This number does not include the number of students that may reapply for SNAP, which would increase the number of students that would be potentially eligible as a result of this waiver.

10. **Anticipated Implementation Date:** The anticipated start date is April 1, 2020, for a period of 120 days (through July 31, 2020).
11. **Proposed Quality Control Procedures:** The proposal does not affect quality control sampling or procedures.
12. **Date of State Agency's Request:** April 9, 2020
13. **State Agency Contact:**

Name: Katherine Hayden

Title: Performance Coach, Policy, and Workflow Manager, Division of County Operations, Office of Economic Services

Email: Katherine.Hayden@dss.sc.gov

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



Amber Gillum

Deputy State Director, Economic Services