



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF SOCIAL SERVICES

September 18, 2020

Eric Ratchford, Regional Director  
Supplemental Nutrition Assistance Program  
United States Department of Agriculture  
Food and Nutrition Service  
300 Corporate Boulevard  
Robbinsville, New Jersey 08691-1598

Dear Mr. Ratchford:

I am writing to request a waiver of regulations that will allow Virginia to extend suspend periodic reports for the City of Richmond Department of Social Services beginning with those due November 2020. This waiver will ensure that the City can meet the needs of their participants during what is a crisis situation for their agency and community at-large.

The waiver request is enclosed. Please contact Michele Thomas, SNAP Manager, at [REDACTED], if you need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Toni Blue Washington".

Toni Blue Washington, Director  
Division of Benefit Programs

cc: Michele Thomas

Enclosure

## State Waiver Request

1. **Waiver Serial Number:**
2. **Type of request:** Initial
3. **Statutory citation:** The Food and Nutrition Act of 2008, Section 3(f) and Section 6(c)(1)(D)(i)
4. **Regulatory citation:** §7 CFR 273.14(a) and §7CFR 273.12(a)(5)(iii)(A)
5. **State:** Virginia
6. **Region:** MARO
7. **Regulatory requirements:** The Food and Nutrition Act of 2008 at Section 3(f) requires that the certification period not exceed 12 months, except that the certification period may be up to 24 months if all adult household members are elderly or disabled.

**Section 6(c)(1)(O)(i)** of the Food and Nutrition Act of 2008 allows the State agency to require households submit periodic reports at least every six months but no more frequent than monthly.

§7 CFR 273.14(a) *General*. No household may participate beyond the expiration of the certification period assigned in accordance with §273.10(f) without a determination of eligibility for a new period.

§7 CFR 273.12(a)(5)(iii)(A) Submission of periodic reports by non-exempt households. Households that are certified for longer than 6 months, except those households described in §273.12(a)(5)(iii)(A), must file a periodic report between 4 months and 6 months, as required by the State agency. Households in which all adult members are elderly or have a disability with no earned income and are certified for periods lasting between 13 months and 24 months must file a periodic report once a year.

8. **Description of alternative procedures:** Virginia will allow the City of Richmond Department of Social Services to suspend the requirement for households to submit a periodic report for the month of November 2020.
9. **Justification for request:** On Friday March 13, 2020, President Trump declared a national state of emergency in response to COVID-19. Virginia is also under a state of emergency as declared by Governor Northam on Tuesday, March 12. As the adverse impacts of this pandemic continue, Virginia's immediate plan has been to ensure that families do not experience food insecurity as a result. In effort to ensure that households are able to maintain access to food during the COVID-19 pandemic, Virginia is requesting a waiver from the above statutes and regulations for the project area identified as the City of Richmond. Citizens, especially those at high risk, are being advised to avoid congregate areas to reduce exposure to the virus; the local department has adjusted operations to

provide flexibility for staff and to adjust to staffing shortages; and business process and procedures are changing rapidly to meet the mounting demands for service. Our system limitations does not allow us to seek relief for Periodic Reports for the months of September and October 2020; however, we can suppress November reports to prevent them from reaching households.

Richmond City's vacancies for their Economic Support and Independence Division stands at 117 that include 60 vacancies for Benefit Programs Specialist. At this time, the agency only has approvals to hire 19 of the mentioned 117 vacant positions; the full number represents administrative support, program managers, supervisors and self-sufficiency staff. The process to onboard newly hired staff in an emergency capacity as well as through standard channels takes between 45 and 60 days.

The City of Richmond has staff that work in intake and ongoing capacities. Currently, intake is staffed with 16 Benefit Programs Specialist (three are on leave); staffing for ongoing is 13 Benefit Programs Specialist (three are on leave). With the unprecedented numbers of eligibility actions needed along with the clear staffing shortages, there is a crisis in eligibility determinations. This waiver will ensure that there is no adverse harm done to the residents of Richmond City.

**10. Anticipated impact on households and State agency operations:**

Richmond City is the largest project area in Virginia with over 22,000 SNAP households. This represents over 41,000 people, many of represent vulnerable populations of the elderly, disabled, children, and homeless. Households will experience decreased food insecurity and the risk of exposure to COVID-19 is lessened by limiting interactions.

Modifications are needed to the eligibility management system to continue benefit issuance after the certification period end date and suspend closure of cases due to non-receipt of a periodic report.

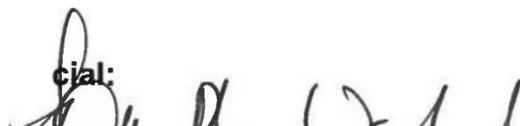
**11. Caseload information, including percent, characteristics, and quality control error rate for affected portion (if applicable):** In August 2020, there were 22,528 SNAP households in the City of Richmond representing 41,204 individuals. Periodic reports for the agency average 1,800 per month.

In addition, the average application submission hovers around 1,100 per month with the added burden of 2,200 recertifications due for September 2020 the agency is overwhelmed. Recertifications due for the months of October are estimated at 2,300, November is projected at 2,200, and December has the highest at 2,600. The state reported Quality Control error rate through January 2020 is 5.22%.

**12. Anticipated implementation date and time period for which waiver is needed:** Starting with November 2020 periodic reporting process which begins October 10, 2020.

**13. Proposed quality control review procedures:** There is no need for special Quality Control procedures.

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**14. Signature and title of requesting offi**

Toni Blue Washington  
Director, Division of Benefit Programs

[REDACTED]

**16. Date of request:** September 18, 2020

**17. State agency staff contact (name/email/telephone):**

Michele Thomas

[REDACTED]

[REDACTED]

**18. Regional office contact person (to be completed by FNS regional office):**

Kelly Boger

[REDACTED]

[REDACTED]