

STATE WAIVER EXTENSION REQUEST

1. **Waiver Serial Number: COV-123**
2. **Type of request: Adjustment:** Core Verification and Interview Adjustment
3. **Regulatory citation:** 7 CFR 273.2(a)(2), 273.2(e), and 273.14(b)(3)
4. **State: VA**
5. **Region: MARO**
6. **Regulatory requirements:**

Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.2(a)(2) require the State agency conduct an interview as part of the application process.

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

Regulations at 7 CFR 273.14(b)(3) require that State agencies interview households as part of the recertification process.
7. **Proposed alternative procedures:** Under this adjustment, local Virginia departments of social services may waive the certification interview for households in which all the adult members are elderly or disabled with no earned income. Virginia also seeks to allow households comprised of homeless members to be included in this adjustment. Local Virginia departments must review every case and conduct streamlined recertification interviews for at least 50% of non-elderly, disabled, or homeless households. Local departments must process all applications using standard data matching for all required verifications where possible, including assessing possible changes in income from unemployment benefits. Local departments must also determine eligibility by completing all actions normally taken at recertification. Local departments must conduct interviews for initial applications.
8. **Justification for request:** Staff normally complete between 20,000-25,000 recertification applications. We anticipate recertification applications will be higher in the coming months. We anticipate recertification applications will be 8.64% higher than average in August 2020; 76.73% higher in September 2020; 100.30% higher in October 2020; 85.81% higher in November 2020; and 112.24% higher in December 2020. The interview adjustment should allow staff to complete recertification application more quickly in light of the anticipated increased number of applications.

This adjustment request results from the public health emergency declaration by the Secretary of Health and Human Services under section 319 of the Public

Health Service Act remains in place and an emergency order for Virginia remains in place.

9. Caseload information, including percent of caseload and description of population expected to be affected by this waiver:

We anticipate a recertification backlog is likely to begin in September 2020, as staff is likely to complete 76% of the renewals due in September. This should increase each month as the number of recertification applications due also increases each month as certification periods were extended because of the pandemic. We anticipate that the workload of local staff is also likely to increase, as there will be simultaneous increased caseloads for other programs.

In June 2020, 384,686 households participated in the program in Virginia. Conceivably, one-twelfth of the caseload is due for recertification each month, or an average of 32,057 cases each month. We project the following to be the number of upcoming renewals for SNAP:

September 2020 - 39,111
November 2020 - 41,120

October 2020 - 44,327
December 2020 - 46,969

In comparison, the number of recertification applications received in 2019 was:

September 2019 – 28,226
November 2019 – 24,352

October 2019 – 27,914
December 2019 – 27,825

10. Anticipated impact on households and State agency operations:

There is no anticipated impact on households, as households will continue to receive benefits monthly based on verified or reported information. This waiver will affect State agency operations through our local offices. Case processing and caseload maintenance occurs at the local level. In addition, to cases that would routinely be set for recertification in the coming months, cases that had their certification end dates automatically extended will also come due for recertification. Because of the certification extensions, local offices will have increased recertification that require evaluation.

11. Anticipated implementation date and time period for which waiver is needed (please indicate if the waiver approval is needed to make system adjustments):

We request this waiver for immediate implementation through December 31, 2020. We do not require any system changes to implement this waiver.

12. Proposed quality control review procedures: Quality Control will monitor cases as required by federal guidance. We have no proposed changes to the review process.

13. Name, title, and email of requesting official:

Toni Blue Washington

Toni Blue Washington
Director
Division of Benefit Programs

14. Date of request: August 25, 2020

15. State agency staff contact:

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16. Regional Office contact person: Anita Diggs