



March 16, 2020

Ms. Bonnie Brathwaite
SNAP Regional Division Director
USDA/FNS Northeast Regional Office
10 Causeway Street, Room 501
Boston, MA. 02222

Dear Director Brathwaite:

As part of the Virgin Islands Department of Human Services (VIDHS) Pandemic Contingency Plan, I am requesting approval of the attached Waiver Request to extend the certification period for ongoing households due to recertify in March, April and May 2020 by two months.

On Monday, March 16, 2020, the Virgin Islands Department of Health announced the confirmation of the second case of COVID-19 in the territory. This confirmation along with Governor Albert Bryan, Jr.'s State of Emergency and Public Health declaration, heightens the level of precaution and preventative measures for the V.I. The Governor has asked all central government agencies to submit Contingency Plans to reduce the number of persons coming into government offices, which is in full alignment with the CDC guidance for "social distancing."

Unlike many mainland jurisdictions, the V.I.'s Health Care System lacks the capacity to effectively respond to a large-scale outbreak of COVID-19. Currently, test results for suspected cases are flown to a lab on the mainland. A step that adds at least 3-5 days to the process of confirmation. Our two district hospitals are still severely compromised, and we have had a reduction in medical care being provided in the territory. Therefore, it is extremely critical for us to be implement aggressive and proactive measures to prevent the spread of this virus.

VIDHS is committed to providing our clients with the optimal level of service needed, while at the same time ensuring their safety and the safety of our employees. The following additional measures will be implemented as part of our effort to respond to this pandemic:

- The territory has opted to implement telephone interviewing procedures effective immediately for new and reopened customer applications as well as recertifications.
- Customers will be encouraged to download the application and change forms located on the DHS website.
- Customers will be encouraged to email, mail, fax documents or deposit them in a secure drop box located at each local office. The agency will expand telephone coverage to ensure responsive customer service.

- Frequent public service announcements will inform the community of all program and procedural changes as well as appearances on radio broadcasts which will be available on our DHS Facebook page and DHS website, when at all possible.

On behalf of my VIDHS SNAP staff, I would like to express our appreciation for the continued support and cooperation received from you and your staff at the Northeast Regional Office (NERO).

Sincerely,

Kimberley Causey-Gomez

Kimberley Causey- Gomez
Commissioner

xc: Michal Rhymer-Browne, Assistant Commissioner
Natalie Bailey, SNAP Administrator
Pauline Dawes, SNAP Assistant Administrator
Emmanueline Archer, SNAP Territorial Director

Attachment

WAIVER REQUEST
CERTIFICATION PERIODS

1. **Type of Request:** Initial
2. **Primary Regulation Citation:** 7 CFR 273.10(f)(5)
3. **Secondary Regulation Citation, if any:** N/A
4. **State:** Virgin Islands
5. **Region:** North East
6. **Regulatory Requirements:**

Lengthening certification periods. State agencies may lengthen a household's current certification period once it is established, as long as the total months of the certification period do not exceed 24 months for households in which all adult members are elderly or disabled, or 12 months for other households. If the State agency extends a household's certification period, it must advise the household of the new certification ending date with a notice containing the same information as the notice of eligibility set forth in paragraph (g)(1)(i)(A) of this section.

7. **Proposed Alternative Procedures:**

Beginning with March 23, 2020 recertifications, the Virgin Islands (VI) Department of Human Services (DHS) proposes to add two months to the certification period for all Supplemental Nutrition Assistance Program (SNAP) households in the entire state.

8. **Justification for Request:**

The DHS anticipates an increase in the number of new and reopen applications as a result of the downturn in the V.I. economy, due to the negative impact of COVID 19 on the tourism industry. As a result of COVID19 all cruise ship visits to the territory have been suspended for at least the next 30 days. This action, coupled with a reduction in on-island visitors, will negatively impact the income received by a significant number of households in the community. Most of these households will apply and be determined eligible to receive SNAP.

This anticipated influx of additional households, and the agency's implementation of measures to contain the spread of COVID19, reduces the VI's ability to efficiently manage the increased caseload without the waiver to extend certification period as requested.

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9. Anticipated Impact on Households:

This waiver enables recipients to maintain participation at their current level and not suffer hardship due to delayed recertification of benefits.

10. Affected Case Load:

This waiver will affect approximately **2308** ongoing SNAP cases in the Virgin Islands.

11. Anticipated Implementation Date and Time Period for Which Waiver is Needed:

This waiver will be implemented immediately upon approval and will affect certification periods for March 23, 2020 through May 2020.

12. Proposed Quality Control Review Procedures:

The Virgin Islands DHS requests that Quality Control provisions pertaining to issuance of benefits not be applied for the months in which this waiver is in effect.

13. Signature and Title of Requesting Official:



Natalie Bailey
Administrator, DFA
Virgin Islands Department of Human Services



Kimberley Causey-Gomez
Commissioner
Virgin Islands Department of Human Services

14. Date of Request: M a r c h 17, 2020

