



STATE OF WASHINGTON
DEPARTMENT OF SOCIAL AND HEALTH SERVICES
Economic Services Administration
Post Office Box 45440 Olympia WA 98504-5440

Jesus Mendoza Jr.
Regional Administrator
Western Region
90 Seventh Street, #10-100
San Francisco, CA 94103
Email Delivery

Dear Mr. Mendoza:

Please find below Washington's request to waive two federal regulations related to Supplemental Nutrition Assistance Program Quality Control. Due to the impacts from COVID-19 we are requesting to waive 7 CFR 275.11 (e)(1) and (f)(1) to exempt all March, April, and May 2020 active cases from the Quality Control (QC) sample. Due to eliminating three months of cases from the sample we are requesting to waive 7 CFR 275.11 (b)(1) to adjust the minimum annual sample size for Active Quality Control case reviews.

Containing and reducing the transmission of COVID-19 continues to be a priority nationwide. Washington State had the first confirmed case and death from COVID-19. Since Washington State was the first state experiencing the outbreak we saw impacts early and remain aggressive requiring social distancing. Below is summary of official events. Employers took action often days to weeks in advance of any official decrees by our governor or city mayors, including shuttering businesses, laying off or letting go of staff, or limiting services. The actions resulted in direct adverse impact on the Washington State workforce. Official steps in Washington State include:

Date	Event	Impact
January 21	CDC confirms the first COVID-19 case in the nation in Washington State	
February 29	CDC confirms the first death from COVID-19 is in Washington State	
February 29	Governor Inslee declares a State of Emergency	State agencies directed to use all necessary resources to prepare for and respond to the outbreak
March 11	Governor prohibits gatherings of over 250 people in three densely populated counties in the state	Businesses and places of faith cancel events

March 12	Governor issues six week school closure for the same three counties	Workforce reduced since working parents are now caring for children full time
March 13	Governor closes all schools in the state	Workforce reduced further since more working parents are now caring for children full time
March 16	Governor closes all restaurants, bars and large social gatherings	Impacted employers no longer able to provide employment
March 16	Daily number of SNAP applications double and volume continues as of today (April 1)	Eligibility workers not able to maintain typical level of service
March 19	Governor stops all elective surgery and dental care	Impacted employers no longer able to provide employment
March 20	SNAP offices limit in-person services for clients	SNAP call volumes begin dramatic spike
March 15-21	Record breaking number of new unemployment claims throughout the entire state with areas ranging from 539% to 1,826% increase from the previous week	Thousands are unemployed and are reporting changes to the SNAP office or applying for benefits
March 23	Governor issues a two week Stay Home, Stay Healthy order. Requires residents to stay home, all businesses must close unless they are essential and any social gathering is banned.	Majority of employers are impacted, no longer able to employ workforce and close
March 26	SNAP offices further limit in-person services until further notice and staff that meet the CDC's high risk category are moved to telework	Call volume remains high and employees deployed to telework are getting equipment, proper system access and training
March 22-28	New unemployment claims jump 44% from last week's record breaking numbers	
March 30	Governor provides enforcement guidance to Stay Home, Stay Healthy	
April 2	Governor extends Stay Home, Stay Healthy through May 4.	Businesses remain closed

SNAP daily application volume continues to double since March 16, 2020 with March 23, 2020 marking the highest volume of application in-take in our state's history. In conjunction with the unprecedented workload, employee leave use has spiked. The combination of these two events along with other changes has resulted in an unprecedented amount of calls not being answered by a call agent.

Even with the blanket waivers FNS provided for SNAP quality control regarding face-to-face interviews and extension of deadlines, following other normal procedures is not possible. We are unable to get verification or client cooperation. We assure you that Washington State is aggressively developing mitigation strategies to address these changes, regardless, this letter reflects our current state.

Washington Department of Social and Health Services (DSHS) requests to exempt the requirement for March 2020 through May 2020 active cases from being sampled for Quality Control Review:

- **Type of Request:**
Initial
- **Regulatory Requirement:**
Requesting to waive Supplemental Nutrition Assistance Program regulations 7 CFR 275.11(e)(1) and (f)(1) to exempt all March, April, and May 2020 active cases from being sampled for Quality Control review.
Requesting to waive 7 CFR 275.11 (b)(1) to adjust the minimum annual sample size for Active Quality Control case reviews
- **Proposed alternative procedures:**
The department is requesting a reduction to the minimum annual sample size for FFY2020 active cases from 1020 to 850. The adjustment is based on keeping the sample at a size that validates the SNAP caseload and the department's capacity to complete cases by the end of the fiscal year.
The formula for determining the reduced sample size is based on the average number of active cases QC completes each month and then reducing the sample size by two months.
$$1020/12 = 85 \quad 85 \times 2 = 170 \quad 1020 - 170 = 850$$

Even though the department is requesting to have three months exempted from the QC universe the department is not requesting to reduce the sample size by a three month average. Based on our experience regarding early issuance in 2019 we know we have capacity to oversample throughout the rest of the fiscal year for the equivalent of one month worth of cases.
- **Anticipated Implementation Date and Time Period Needed:**
Washington anticipates implementing the waiver upon approval for March, April and May 2020 Review months. An extension may be requested if the virus has not been contained.
- **System requirements:**
There is no system change required
- **Justification of Request:**
Coronavirus COVID-19 (see table above for specifics)
Affected caseload: SNAP
SNAP office staff have increased leave use
SNAP applications have more than doubled
Statewide call center system unable to handle volume of a calls

Thank you for your consideration of this request. As a nation we are in unprecedented times and we do not take lightly our responsibility to balance the needs of our customers, our state and the FNS polices. We welcome your feedback on the successful use of the waiver and look forward to providing any further information you may require.

If you have any questions, please contact Annie Vandenberg of the Division of Program Integrity at 360 819-3095 or email at imkamla@dshs.wa.gov.

Sincerely,

A handwritten signature in black ink that reads "D. Doyle". The signature is written in a cursive style with a large, looped "D" and a trailing flourish.

Deborah Doyle, Director
Division of Program Integrity

cc: Charles Tobin, FNS
Maribelle Balbes, FNS
Annie Vandenberg