



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

March 27, 2020

Jesus Mendoza, Jr. Administrator  
Supplemental Nutrition Assistance Program  
Food and Nutrition Service, Western Region  
United States Department of Agriculture  
90 Seventh Street, Suite 10-100  
San Francisco, California 94103

Dear Mr. Mendoza:

Washington State is requesting a waiver to allow SNAP benefit approval for three full months, under the good cause exemption in CFR 273.6(d), for applicants who are unable to apply for a Social Security Number, and who are otherwise eligible. The current good cause rules allow one-month periods, reviewed monthly.

The Social Security Administration has closed its offices to all in-person services, and those who are 12 and over who need to apply for an SSN must do so in person. (Applications for those under 12, including newborns, may be processed online.) This closure makes it impossible for those who need an SSN to apply, and we do not yet know how long this will last. It also seems likely that when the offices reopen, they will face a backlog of service requests that require in-person processing.

The proposed waiver will allow good cause for not providing proof of application or the number itself for three months beyond the month of application, with extensions of three months allowable upon review of the case and the circumstances of the Social Security Administration. This will help some of our neediest, including newly arrived refugees or asylees, receive benefits without having to request good cause when circumstances have not changed, and will help our eligibility staff, who are dealing with an increased workload related to COVID-19.

We look forward to hearing from your office on this request in the very near future. If you have any questions, please feel free to contact Ezra Paskus at (360) 725-4311 or by email at [Ezra.Paskus@dshs.wa.gov](mailto:Ezra.Paskus@dshs.wa.gov)

Sincerely,

Babs Roberts, Director  
Community Services Division

March 27, 2020

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Attachment

cc: Charles Tobin, FNS  
Brian Solomon, FNS  
Maribelle Balbes, FNS  
Elizabeth Albert, FNS

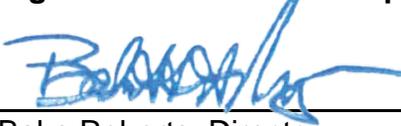
Shahdy Monemzadeh, FNS  
Alexis Marx  
Ezra Paskus

Shawn Hartline  
Sonja Dearmore  
Monica Medalen

## WAIVER REQUEST

### Extend Timeframe for Good Cause for Failure to Provide SSN

1. **Waiver Request Number:**
2. **Type of Request:** New
3. **Primary Regulation Citation:** 7CFR 283.6 (d)
4. **Secondary Regulation Citation, if any:** n/a
5. **State:** Washington
6. **Region:** Western
7. **Regulatory Requirements:** Regulations at 7 CFR 273.6 require that households participating or applying for SNAP benefits provide the Social Security Number (SSN) of each household member, or apply for one before certification. Section (d) of this chapter addresses good cause requirements for not providing or applying for one. If the household member is able to show good cause why an application has not been completed in a timely manner, that person is allowed to participate for one month in addition to the month of application. This good cause determination must be re-examined monthly.
8. **Proposed Alternative Procedures:** Washington State is requesting a waiver to allow a three-month good cause period. At the end of a client's three-month period, the agency would re-determine good cause for an additional three-month period.
9. **Justification for Request:** During the current COVID-19 pandemic, the Social Security Administration has closed their offices to in-person activities. According to their website, only certain priority services will be available, those that may be done over the phone or online. Applications for SSNs for newborns or children up to age 12 may be completed online, but applications for newly arrived immigrants 12 and over or those age 12 and over whose status has adjusted, must still be completed in person. This is not possible now, and when the offices do reopen, we expect they will have a backlog that may further delay issuing the new numbers.
10. **Anticipated Impact on Households and State Agency Operations:** Under the current process, any cases affected must be reviewed monthly, with the eligibility worker reaching out to the client to see if good cause still exists. With no in-person SSA office visits allowed, the client's circumstances will not have changed. Allowing the good cause redetermination period to extend to three months will ease the burden on staff and eliminate needless contacts with clients.

11. **Caseload Information, Including Percent, Characteristics, and Quality Control Error Rate for Affected Portion:** In February 2020, 751 clients were identified as immigrants participating in SNAP without a Social Security number, either as having an SSN application pending, or not providing one for religious reasons. This represents >.01% of the caseload. In FFY 2019, quality control reviews found no errors related to this issue.
12. **Anticipated Implementation Date and Time Period for Which Waiver is Needed:** Implementation upon approval. We request a waiver period of 6 months, with the possibility of extending in 6-month increments if necessary.
13. **Proposed Quality Control Review Procedures:** For active cases, household members age 12 or over whose SSNs have not been issued will be eligible for three months after the month of application, with extensions allowed in three-month increments. Negative actions based on a client's failure to establish good cause will be found invalid if the good cause period was less than three full months and continuing good cause was not determined correctly.
14. **Signature and Title of Requesting Official:**  
  
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Babs Roberts, Director  
Community Services Division
15. **Date of Request:** March 27, 2020