



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

September 18, 2020

Sasha Gersten-Paal, Director
Program Development Division
Supplemental Nutrition Assistance Program
Food and Nutrition Service
United States Department of Agriculture
Braddock Metro Center II
1320 Braddock Place
Alexandria, VA 22314

Dear Ms. Gersten-Paal:

Washington is requesting reconsideration of the denial regarding our request to *Extend Periodic Reporting requirements due to COVID-19*. With our higher than normal anticipated workload as a result of COVID-19, and the unknown ongoing state of emergency due to current wildfires across the state, we believe adjustments to the periodic reporting requirements are a necessary and appropriate mitigation strategy to properly provide services to Washingtonians during these unprecedented times.

Our waiver request identified several operational impacts based on the anticipated workload challenges for October through December 2020 that meet FNS's consideration to receive an extension beyond August outlined in the *FNS Workload Management Best Practices*:

- 50 percent increase in anticipated recertification applications for the month(s) requested, compared to the same month(s) last year
- 50 percent increase in certification actions (such as recertifications or periodic reports), for the month(s) requested, compared to the same month(s) last year
 - Based on households with periodic reviews and recertifications due in October to December 2020, Washington anticipates a more than 50 percent increase in certification actions (both recertifications and periodic reports), for the months requested, compared to the same months last year.

Month Due:	2019	2020	Workload Increase
October	61,857	117,255	89.56%
November	56,281	97,293	72.87%
December	57,183	88,042	53.97%

- 50 percent increase in new applications in the previous three months prior to the months(s) requested, compared to the same month(s) last year
 - Washington recently experienced elevated numbers of SNAP applications, which we estimate will continue into October, until statewide phased re-opening restarts and unemployment numbers decrease.

Application Month:	2019	2020	Application Increase
July	33,437	88,712	165%
August	32,119	68,694	114%
Average:	32,778	78,703	140%

Washington state continues to have a statewide emergency proclamation related to COVID-19, meeting the additional requirements outlined in the FNS guidance. In addition to the requirements identified in the guidance, the following continue to directly impact the department’s ability to manage its workload:

- The SNAP caseload has increased substantially as a result of the pandemic, which increases the normal number of periodic reports in October to December of 2020:

SNAP Caseload	2019	2020	Caseload Increase
March	481,637	574,072	+92,435
April	480,296	587,873	+107,577
May	478,848	597,181	+118,333
June	477,169	600,973	+123,804
July	475,618	535,270	+59,652
August	475,633	534,642	+59,009

- Phased county-by-county reopening paused due to continued increase in COVID-19 infections statewide; this is expected to continue into the requested period.
- The department continues to experience an increased phone call volume, impacting operations due to COVID-19 related changes such as:
 - Inquiries and verbal request for P-EBT
 - Increase in Telephonic Signatures due to office closures
 - Request for other available programs, such as Disaster Cash Assistance Program (DCAP)

Our data shows the anticipated workload and substantially increased SNAP caseload numbers will hinder our ability to provide families the proper benefits in a timely fashion consistent with SNAP integrity and timeliness requirements as we continue to receive higher than normal SNAP applications.

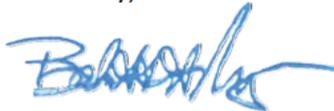
A new complicating factor to Washington state’s ability to return to the “new normal” is the unprecedented impacts of the wildfires and resulting power outages across the state. Requests to replace benefits due to food lost in a disaster or household misfortune continue to climb in addition to request for other programs such as the Disaster Cash Assistance Program in connection to the wildfires.

Washington state has to juggle the challenges of the COVID-19 public health emergency as well as the most recent wildfire state of [emergency proclamation](#) declared by Governor Jay Inslee. This unprecedented operational impact further hinders our ability to process SNAP certification actions timely.

We have presented adequate information regarding workload impacts as we continue to navigate the challenges of the public health emergency. Therefore we are formally requesting more information regarding the denial of this request, including further justification.

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 [REDACTED] or by email at [REDACTED].

Sincerely,



Babs Roberts, Director
Community Service Division

Attachment

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