

WAIVER REQUEST

Extend Certification Periods and Adjust Periodic Reporting Requirements

1. **Waiver Request Number:** COV-17
2. **Type of Request:** Extension
3. **Primary Regulation Citation:** 7CFR 273.10(f)(5)
4. **Secondary Regulation Citation:** 7CFR 273.14(a), 7CFR 273.12(a)(5)(iii)
5. **State:** Washington
6. **Region:** Western
7. **Regulatory Requirements:** Supplemental Nutrition Assistance (SNAP) regulations at 7 C.F.R. §273.10(f)(3)(i) require a minimum certification period of 6 months for most households. Regulations at 7 C.F.R. §273.10(f)(5) allow States to extend certification periods up to 12 months or 24 months for those households that are all elderly or disabled. Regulations at 7 CFR 273.12(a)(5)(iii) require an interim periodic report between 4 and 6 months (typically in the sixth month) for households assigned to simplified reporting (SR), if the certification period exceeds 6 months.

SNAP regulations at 7 C.F.R. §273.14 state that no household may participate beyond the expiration of the certification period assigned in accordance with §273.10(f) without a determination of eligibility for a new period. The State agency must establish procedures for notifying households of expiration dates, providing application forms, scheduling interviews, and recertifying eligible households prior to the expiration of certification periods. Households must apply for recertification and comply with interview and verification requirements.
8. **Proposed Alternative Procedures:** The State Agency (SA) will adjust the expiration for certification periods expiring in October, November, and December 2020 who were not previously extended per waiver #COV-17, and will extend the certification period of these households for up to 6 months until April, May, and June 2021. The State will also eliminate the periodic reporting requirement for households with a periodic report due between October through December 2020 and for households whose certification period is extended under this adjustment.
9. **Justification for Request:** SA anticipates an increased workload in the upcoming months of October, November, and December 2020 as a result of increased applications due to COVID-19 that have a periodic report due and increased recertifications due previously

extended per waiver #COV-17. This workload increase will impact the SA's ability to prioritize new applications and meeting timely processing and completion rates.

Anticipated Impact on Households and State Agency Operations: We expect the operational impacts in October, November, and December 2020 to average a 72.59% increase to our regular workload for processing periodic reports and recertifications. This will strain our ability for staff to work on newly submitted applications and other reported changes to benefits.

Comparing previous year's workload with the anticipated workload in October, November, and December 2020:

Month Periodic Reports and ERs Due:	2019 Cases	2020 Cases	Workload Increase
October	61,857	117,255	89.56%
November	56,281	97,293	72.87%
December	57,183	88,042	53.97%
Average:	58,440	100,863	72.59%

The SA averages 33 minutes to complete periodic reports and ERs each month. Based on the anticipated workload increases, this equates to an estimated additional 23,332 operating hours to complete the reviews on top of existing reviews and workload for other programs and actions.

An approved waiver will reduce the workload and therefore reduce the potential for delays in benefits to households due to late processing of recertifications or periodic change reports.

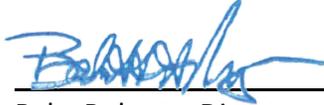
10. **Caseload Information, Including Percent, Characteristics, and Quality Control Error Rate for Affected Portion:** As indicated above, the anticipated workload impacts for October, November, and December:

Month Periodic Reports and ERs Due:	Total Cases	Workload Increase
October 2020	117,255	89.56%
November 2020	97,293	72.87%
December 2020	88,042	53.97%
Average:	100,863	72.59%

If approved for the waiver, the SA workload will be more representative to the previous year's workload, which will allow the SA to continue prioritizing new applications and meeting timely processing and completion rates.

Month	Total Cases	Total Periodic Reports Waived	Total ERs Waived	Workload After Waiver
October 2020	117,255	62,259	26,459	28,537
November 2020	97,293	34,229	9,883	53,181
December 2020	88,042	18,976	12,342	56,724

11. **Anticipated Implementation Date and Time Period for Which Waiver is Needed:** This waiver extension is for October 1, 2020, through December 31, 2020.
12. **Proposed Quality Control Review Procedures:** SNAP Quality Control will review cases affected by this waiver against the terms of this waiver and in accordance with FNS Handbook 310.
13. **Signature and Title of Requesting Official:**



Babs Roberts, Director
Community Services Division

14. **Date of Request:** August 28, 2020

Adjustment Extension Briefing for USDA Leadership

State Agency and Region: Washington State / WRO

What Adjustment(s) is the State Requesting: Adjust the expiration for certification periods and periodic reporting requirement from October, November, and December 2020 for up to 6 months, until April, May, and June 2021.

Any cases already extended from April, May, and June 2020 will not be re-extended.

Demonstrated Need for Extension of the Adjustment:

Workload increase is expected in the month of October, November, and December compared to previous years' workload for periodic reports and ERs:

Month Periodic Reports and ERs Due:	2019 Cases	2020 Cases	Workload Increase
October	61,857	117,255	89.56%
November	56,281	97,293	72.87%
December	57,183	88,042	53.97%
Average:	58,440	100,863	72.59%

By waiving periodic reports and ERs from October to December 2020, the State agency anticipates workload to be similar to the pre-COVID workloads.

Month	Waived Periodic Reports	Waived ERs	Total Waived:	Total Remaining Workload:
October 2020	62,259*	26,459	88,718	28,537
November 2020	34,229	9,883	44,112	53,181
December 2020	18,976	12,342	88,042	56,724

*Double the regular amount of periodic reports anticipated as a result of substantial increases to SNAP applications as a result of the COVID-19 pandemic.

Due to budget restrictions, the State agency will be closed one day per month for furlough, limiting availability to process work in addition to expected staff reductions as the staff are given an opportunity to voluntarily separate or take early retirements.

We continue to redirect most eligibility staff to process new applications, and staff time that would have been used to process ERs and MCRs could be devoted to the high volume of new applications.

How Does the State Plan to Transition to the New Normal:

All offices will remain closed for in-person contact and are anticipated to be closed until estimated 12/31/2020. The State agency is completing an in-depth review of phasing the department back to normal.