



STATE OF MISSISSIPPI
Tate Reeves, Governor
DEPARTMENT OF HUMAN SERVICES
Robert Anderson, Executive Director

March 25, 2020

Gene Malveaux, Regional Director
United States Department of Agriculture
Food and Nutrition Service
Southeast Region
61 Forsyth Street, Room 8T36
Atlanta, Georgia 30303-3415

Dear Mr. Malveaux:

Enclosed is a waiver request to allow Mississippi to extend the certification periods by four (4) months for Supplemental Nutrition Assistance Program (SNAP) households. This waiver will allow the Mississippi Department of Human Services (MDHS) to waive Federal regulations at 7 CFR 273.12(a)(5)(iii)(B) regarding the submission of periodic reports. The waiver request cites regulations at 7 CFR 273.2(e) and 7 CFR 273.10(f)(5) in support of the proposed action.

In response to the Coronavirus (COVID-19) pandemic and the resulting economic downturn, the State agency believes extending certification periods will provide the necessary support for local agency offices in processing the substantial increase in SNAP applications. Additionally, the waiver will help ensure that SNAP applicants and recipients receive benefits in a timely manner.

Should your staff have questions or need additional information regarding this waiver request, please contact Rick Dawkins at (601) 359-4621 or rick.dawkins@mdhs.ms.gov.

DocuSigned by:

Jacob Black

6FCAB0F64E18497...

Jacob Black, Deputy Executive Director for Operations
Mississippi Department of Human Services

JB:BTA:RD:rd

Enclosure



WAIVER REQUEST – Certification Period Extension

1. **Waiver Serial number:**
2. **Type of request:** Initial
3. **Regulatory citation:** 7 CFR 273.2(e), 7 CFR 273.10(f)(5), 7 CFR 273.12(a)(5)(iii)B)
4. **State:** Mississippi
5. **Region:** Southeast
6. **Regulatory requirements:** Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.2(e) require State agencies to conduct face-to-face interviews at initial certification and at least once every 12 months thereafter. States may conduct telephone interviews and must schedule interviews for all applicant households that are not interviewed on the day applications are submitted.

Regulations at 7 CFR 273.10(f)(5) provide that state agencies may lengthen established household certification periods, provided the total months of the certification period do not exceed 24 months for households in which all 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.

Regulations at 7 CFR 273.12(a)(5)(iii)(B) require submission of periodic reports by non-exempt households certified for more than six months.
7. **Proposed alternative procedures:** In response to the Coronavirus (COVID-19) pandemic, the Mississippi Department of Human Services (MDHS) proposes to extend the certification period by four (4) months for all SNAP households in the State certified for six (6) or twelve (12) months, beginning for the month of April 2020. All households will be notified of the extension of the certification period as required by regulations. To accommodate this proposed action, Mississippi is requesting a waiver of the requirement that periodic reports be submitted for households certified for more than six months.
8. **Justification for request:** As of March 25, 2020, the Mississippi Emergency Management Agency (MEMA) is reporting 377 cases of COVID-19 and two (2) related deaths in the State. Schools and many businesses statewide are closed, with a significant number of persons out of work due to the pandemic. In the interest of maintaining social distancing to ensure the safety of both agency staff and the public, lobby areas of MDHS offices are closed to the public. The agency is conducting interviews by telephone only and encouraging applicants and recipients to submit documents via electronic means.

Mississippi is experiencing a substantial increase in SNAP applications. For example, within the span of one week in March 2020 as the effects of the pandemic were being realized, the number of online applications received was 8,838, far exceeding the total of

1,923 online applications received in the previous week. This waiver will aid local staff in handling the significant increase in SNAP applications resulting from the pandemic.

In normal disaster conditions, county staff reassigned to assist with the disaster would be returning to their home counties within a few months. However, in this historic event, no county staff have been reassigned, as the entire State is affected. All county staff are struggling to process the historic number of SNAP applications being received in response to the economic downturn caused by COVID-19. In addition, all MDHS hiring in Mississippi has been suspended due to COVID-19, so any staff that have been placed on administrative leave that do not return at the end of the pandemic (who may have found employment in the private sector) may result in a personnel shortage for the State at the end of the pandemic. As such, only extending the certification period for cases coming due for recertification over the next few months would cause an undue burden in the month the new extended certification period expires by causing staff to process any initial applications and both recertification applications from the initial month of the extended certification period and regular recertification applications. Recovery from COVID-19 will reach beyond the extended certification periods which will require MDHS to evaluate the availability of staff returning to work, the increased influx of face-to-face contact when county offices are reopened, and readjustments made to relaxed policy requirements.

No SNAP households in Mississippi are currently required to submit periodic reports. The waiver would prevent this additional burden from being placed on households, thus eliminating the need for the State to implement additional system changes or a manual process to accommodate periodic reports.

- 9. Anticipated impact on households and State agency operation:** This waiver will ensure that SNAP applicants and recipients receive benefits in a timely manner. Caseworkers will be aided in processing the significant increase in applications due to the pandemic.
- 10. Affected Caseload:** This waiver will affect approximately 151,800 SNAP cases in Mississippi.
- 11. Anticipated implementation date and time period for which the waiver is needed, including system adjustment requirements:** Implementation of this waiver will begin immediately upon approval by the Food and Nutrition Service. The waiver is needed to make required system changes to accommodate the extension of certification periods for all regular SNAP households beginning in April 2020.
- 12. Quality control procedures:** No special quality control procedures will be required. Cases will be reviewed using standard review procedures contained in FNS Handbook 310.
- 13. Date of State agency's request: March 25, 2020**
- 14. State agency contact (name/email/telephone):** Rick Dawkins
(rick.dawkins@mdhs.ms.gov) (601) 359-4621

15. Signature, title, email of the requesting official:

DocuSigned by:

Jacob Black

6FCAB0F64E18407...

Jacob Black, Deputy Executive Director for Operations
Mississippi Department of Human Services
jacob.black@mdhs.ms.gov