

Waiver Request- Vermont

1. **Type of request:** Initial
2. **Primary regulation citation:** 7 CFR 273.10(f), 7 CFR 273.10(f)(5), 7 CFR 273.12(a)(5)(iii)(B), 7 CFR 273.14(a)
3. **State:** Vermont
4. **Region:** Northeast
5. **Regulatory requirements:** 7 CFR 273.10(f) states households must be certified for a definite period of time, not to exceed 12 months unless the household is elderly/disabled or residing on a reservation, in which certification periods cannot exceed 24 months. Regulations at 7 CFR 273.10(f)(5) specifically indicate that SNAP certification periods may not be lengthened to exceed 12 months, unless the household contains an elderly/disabled member, in which certification periods may not exceed 24 months.


7 CFR 273.12(a)(5)(iii)(B) indicates that a periodic report form must be filed by the end of month 6 for households that are subject to a 12-month certification period, or that a periodic report must be submitted by the end of month 12 for a 24-month certification period. 7 CFR 273.14(a) forbids households participating beyond the expiration of the certification period assigned.

6. **Description of alternative procedures:** This waiver will allow for a temporary, 12-month extension of certification months beyond 12 or 24 months for any households that are subject to a recertification during the months of May, June and July. Additionally, any periodic report forms otherwise due within the 3-month waiver period would be waived. Certification periods will be automatically extended by 12 months to ensure that case closures do not occur because of a client's inability to go into an Economic Services district office or otherwise submit paperwork to recertify or meet periodic report requirements. This will also mitigate any potential for closure due to a reduced workforce within Economic Services and/or an inability to process timely due to COVID-19. Periodic report forms will not be issued nor required to be sent back during the months of May, June or July.

VT will maintain mandatory reporting requirements that take place in between certification periods. However, households will not be required to file a periodic report or recertification nor be subject to those additional reporting requirements during those 3 months.

7. **Justification for request:** VT is requesting this waiver due to COVID-19 and the effects it is and will have on our state and our customers. Limiting barriers to SNAP benefits wherever possible, while allowing our staff to focus on integrity and timeliness of benefits are our priorities. This waiver will allow VT to adjust to the influx of

applications and take care of our ongoing caseload at the same time. We are also looking to limit mail, calls to our Benefit Service Center and any walk-in traffic during this time. By extending certification periods during this time it will give us a fighting chance to assist those that are newly in need of our services and navigating very uncertain times. VT is also anticipating a reduced workforce at some point in time due to COVID-19. This waiver will help VT triage our resources to focus on new applications and take care of the health and well-being of our staff and customers.

8. **Anticipated impact on households and State Agency operations:** Vermont anticipates this will allow our workforce to focus on new applications and reduce further spread of COVID-19 by limiting contact with our ongoing SNAP recipients as much as possible during this time. This will also allow us to continue to process cases with the utmost integrity and timeliness standards.
9. **Caseload information, including percent of caseload and description of population expected to be affected by this waiver:** For February 2020, the VT's caseload included 67,521 people in 38,928 SNAP households. Of these numbers, 14,859 were aged 60+ elderly and an additional 21,607 were children.
10. **Time Period for which Waiver is needed:** We are requesting approval as soon as possible and will implement the 12-month certification extension as soon as approval is received. We want to waive the recertification requirement for an additional 12 months for the months of May, June and July. We also want to suspend Interim Reports for 6 months, May through October.
11. **Proposed Quality Control Review Procedures:** VT is requesting that the state be held harmless for any untimely processing of changes reported as we anticipate a reduced workforce and want to focus on ensuring that all new applications are processed timely and accurately.
12. **Signature and Title of Requesting Official:**


Sean Brown
Deputy Commissioner, Economic Services Division
13. **Date of Request:** March 24, 2020