



DEPARTMENT OF ECONOMIC SECURITY

*Your Partner For A Stronger Arizona*

Douglas A. Ducey  
Governor

Thomas Betlach  
Interim Director

March 23, 2020

Mr. Dwight Crudup  
Regional Director  
United States Department of Agriculture  
Food and Nutrition Service  
1100 Commerce Street, Room 522  
Dallas, Texas 75242

Dear Mr. Crudup:

On March 13, 2020, President Trump declared a national emergency due to the novel coronavirus (COVID-19) outbreak. This is in addition to Arizona's Governor, Douglas Ducey's statewide Declaration of Emergency issued on March 11, 2020.

Federal and state guidance have directed agencies to take additional steps to prepare for, respond to, and mitigate the spread of COVID-19 for purposes of protecting the health and welfare of all individuals. This pandemic requires social distancing including schools, businesses and workplaces being shut down. While Arizona is at the forefront of using technology to process applications, including an easily accessible online application, the state's resources are being challenged to handle the volume of telephone interviews required to process an influx of Supplemental Nutrition Assistance Program (SNAP) applications. In addition, grocery stores are experiencing an increased demand for food items leaving many store shelves bare.

Enclosed is Arizona's Request to Provide Emergency Allotments (Supplements) to SNAP Households as outlined in H.R 6201, The Families First Coronavirus Response Act.

Adding to our need for responsible leadership and innovation during this time, Arizona is preparing a series of office closures. These closures are critical to ensuring the health and safety of our clients and staff; yet, will potentially add barriers to accessing our services. To mitigate these barriers, Arizona is requesting additional program flexibility during this time. In order to provide uninterrupted assistance to SNAP recipients, the Arizona Department of Economic Security, Family Assistance Administration is requesting your consideration of the enclosed SNAP waivers.

**Request to Waive Interview** - Waiving the interview during this pandemic will ensure Arizona is better prepared to respond and fulfill our agency's role to provide recovery to our community in a timely manner.

**Request to Extend Certification Periods** - Extending the certification periods as proposed via an automated process would ensure benefits will continue to be provided to households during this pandemic, reduce workload, and would be a more effective and efficient administration of the SNAP program.

**Request to Allow Hot Meals** - The need for hot food will remain critical through this pandemic as families experience a loss of income or care which could result in their way of life being disrupted such as decreased access to cooking facilities, hot meals and shelter.

**Request to Waive Student Criteria** - Currently eligible students are unable to meet the required 20 hours a week of employment due to business closures. The waiver will also ensure that currently eligible students will maintain their SNAP benefits when they report a change due to widespread business closures.

Your prompt attention to our request is appreciated. If you have questions or require additional information, Mary Guzman, Program Manager, FAA Benefits Support Team, Division of Benefits and Medical Eligibility, serves as the lead staff on this matter and may be reached by telephone at (602) 771-5618 or by email at [MaryGuzman@azdes.gov](mailto:MaryGuzman@azdes.gov).

Sincerely,



Jeffrey W. Morley  
Assistant Director  
Division of Benefits and Medical Eligibility

Enclosures:

AZ Request to Provide Emergency Allotments  
AZ Waiver Request – Waive the Interview  
AZ Waiver Request – Extend Certification Periods  
AZ Waiver Request – Allow Hot Meals  
AZ Waiver Request – Waive Student Criteria

## STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** N/A
2. **Type of request:** Initial
3. **Regulatory citation:** 7 CFR 273.5(a); 273.5(b)
4. **State:** Arizona
5. **Region:** Southwest Region (SWRO)
6. **Regulatory requirements:** The Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.5(a) state that an individual who is enrolled at least half-time in an institution of higher education shall be ineligible to participate in SNAP unless the individual qualifies for one of the exemptions contained in 7 CFR 273.5(b).
7. **Description of alternative procedures:** Arizona is requesting a waiver of regulations at 7 CFR 273.5(a) to allow students who are enrolled at least half-time in an institution of higher education to be eligible to participate in SNAP without being required to meet one of the exemptions in 7 CFR 273.5(b). The state agency will reevaluate for student eligibility at the next periodic report or eligibility review after the pandemic has ceased.
8. **Justification for request:** Because of the COVID-19 pandemic, many businesses, employers and school offices are closed. This makes it virtually impossible to verify if a student is enrolled in an institution of higher education, if the student is approved to participate in a work study program, or if a student is assigned to or placed in an institution of higher education through or in compliance with one of the programs identified in 7 CFR 273.5(b)(11)(i) through 273.5(b)(11)(iv). In addition, students who are eligible for SNAP are impacted by business closures and are unable to work the required 20 hours a week of employment mandated in 7 CFR 273.5(b)(5).
9. **Caseload information, including percent of caseload and description of population expected to be affected by this waiver:** The total statewide caseload as of February 2020 is 380,395. Although Arizona cannot quantify the percentage of recipients that this waiver might impact, it is expected that the number of existing eligible students will remain the same. The number of students who are currently not eligible, but may become eligible due to the waiver, is unknown.
10. **Anticipated impact on households and State agency operations:** The waiver will allow students to be eligible for SNAP without the requirement to meet an exemption in 7 CFR 273.5(b) or for the agency to verify if the student meets one of these exemptions. The waiver will also ensure that currently eligible students will

maintain their SNAP benefits when they report a change in employment as of March 11, 2020 due to widespread business closures.

**11. Anticipated implementation date and time period for which waiver is needed (please indicate if the waiver approval is needed to make system adjustments):**  
The waiver is requested for immediate implementation effective upon approval, and through applications and recertifications processed through June 30, 2020.

**12. Proposed quality control review procedures:** No special QC procedures are required for cases subject to the provisions of this waiver.

**13. Name, Title and email of requesting official:**

Signature

Name: Jeffrey W. Morley

Title: Assistant Director, Division of Benefits and Medical Eligibility  
AZ Department of Economic Security

Email: [JMorley@azdes.gov](mailto:JMorley@azdes.gov)

Tel: 602-542-3577

**14. Date of request:** March 23, 2020

**15. State agency staff contact (name/email/telephone):**

Name: Mary Guzman

Title: Program Manager, FAA Benefits Support Team  
Division of Benefits and Medical Eligibility

Email: [MaryGuzman@azdes.gov](mailto:MaryGuzman@azdes.gov)

Tel: 602-771-5618

**16. Regional Office contact person (to be completed by FNS regional office):**