

WAIVER REQUEST – DISTRICT OF COLUMBIA

1. **Waiver serial number:** N/A
2. **Type of request:** Initial
3. **Primary regulation citation:** Title 7 – Agriculture Subpart C – QC Reviews (275.10 through 275.14)
4. **Secondary regulation citation, if any:** N/A
5. **State:** District of Columbia
6. **Region:** Mid-Atlantic Region
7. **Regulatory requirements:** As part of the Performance Reporting System, each State agency is responsible for conducting quality control reviews. For SNAP quality control reviews, a sample of households shall be selected from two different categories: Households which are participating in SNAP (called active cases) and households for which participation was denied, suspended or terminated (called negative cases). Reviews shall be conducted on active cases to determine if households are eligible and receiving the correct allotment of SNAP benefits. The determination of whether the household received the correct allotment will be made by comparing the eligibility data gathered during the review against the amount authorized on the master issuance file. Reviews of negative cases shall be conducted to determine whether the State agency's decision to deny, suspend or terminate the household, as of the review date, was correct.

Quality control reviews measure the validity of SNAP cases at a given time (the review date) by reviewing against SNAP standards established in the Food and Nutrition Act of 2008 and the Regulations, taking into account any FNS authorized waivers to deviate from specific regulatory provisions. FNS and the State agency shall analyze findings of the reviews to determine the incidence and dollar amounts of errors, which will determine the State agency's liability for payment errors in accordance with the Food and Nutrition Act of 2008, as amended, and to plan corrective action to reduce excessive levels of errors for any State agency.

The objectives of quality control reviews are to provide:

- A systematic method of measuring the validity of the SNAP caseload; A basis for determining error rates; A timely continuous flow of information on which to base corrective action at all levels of administration; and A basis for establishing State agency liability for errors that exceed the National performance measure.
- The review process is the activity necessary to complete reviews and document findings of all cases selected in the sample for quality control reviews.

The review process shall consist of:

Case assignment and completion monitoring; Case reviews; Supervisory review of completed worksheets and schedules; and Transmission of completed worksheets and schedules to the State agency for centralized data compilation and analysis.

8. Proposed alternative procedures: On March 30, 2020, Mayor Muriel Bowser issued a stay-at-home order for the District of Columbia in an effort to reduce the increasing number of coronavirus (COVID-19) cases that is sweeping our region. Under the new order which took effect on Wednesday, April 1, 2020 at 12:01 am., District residents should only leave their homes for the following reasons:

- to engage in essential activities, including obtaining medical care that cannot be provided through telehealth and obtaining food and essential household goods;
- to perform or access essential governmental functions;
- to work at essential businesses;
- to engage in essential travel; or
- to engage in allowable recreational activities, as defined by the Mayor's Order.

There are currently over 1,100 residents that have tested positive and 24 deaths as of April 5, 2020. SNAP operations are currently depleted due to multiple factors including reduced staff, social distancing policies, and significant increases in applications.

Our proposal is to suspend QC reviews for the remainder of FY2020 and suspend the 98% completion rate at the 1020/1200, 600/800 sample size.

9. Justification for request: Due to COVID-19, FNS has provided the District waivers and flexibilities impacting the SNAP certification process which may inhibit the ability to complete QC reviews and/or result in an unfair error rate if the current QC procedures in the FNS 310 Handbook must be followed.

With limited SNAP operations, an increase in the District's caseload, social distancing policies, lack of documentation, lack of system access to collected information, operational waivers, and other pandemic factors, we do not believe that our quality control reviews will achieve the stated objectives of creating a (1) systematic method of measuring the validity of the SNAP caseload, (2) a basis for determining error rates, (3) a timely continuous flow of information on which to base corrective action at all levels of administration, and (4) a basis for establishing State agency liability for errors that exceed the national performance measure.

Reduced staff. SNAP Operations are currently depleted due to multiple factors including

reduced staff and social distancing policies. In addition, social distancing policies such as multiple shifts and alternating schedules further reduce the available staff. Requests to have Economic Service Administration (ESA) center staff scan case files for QC reviews will add a further burden on our operations.

As a result, ESA has submitted a number of requests to FNS for flexibilities in the SNAP certification process. To summarize:

SNAP Initial Applications

- Interviews are waived; SSRs contacting households to clarify any information in order to process the application

- Mandatory verifications still being requested

SNAP Mid-Certs (Periodic Reports)

- Waived for March and April

SNAP Recertifications

- Households extended for March and April

Verifications can be submitted via Email to each Service Center

Online Fillable Form and Verification Submission

- A soft launch of an online fillable combined application and ability for customers to submit verifications starts today (April 1)
 - Allows DC residents to submit a combined app and/or verification online to ESA

EBT Cards

- Working to shift to mailing EBT cards.

Increased caseload. Furthermore, we are seeing a significant increase in our SNAP caseload. We expect this caseload to increase as businesses close or significantly reduce their hours, residents experience economic impacts due to job suspensions or losses, more people are unable to work at consistent hours due to social distancing, more people learn about our programs and start to apply for benefits, and operational waivers to ease the burden on eligibility workers go into effect.

Lacking documentation and verification. With limited resources to conduct our operations, we may be unable to follow our normal procedures of having our agency operations scan case files and verifications into our document imaging system. Without that capacity, QC reviews cannot be properly completed. Furthermore, QC staff may be unable to obtain needed outside verifications in order to complete reviews. All non-essential businesses are closed and even upon resuming normal operations, they will not be in a position to respond to verification requests.

Telework Limitations. In response to the pandemic, our office has instituted work from home policies. Currently, all SNAP QC staff are instructed to work from home until further notice.

Change in SNAP procedures and policies. With the blanket waivers that have been granted in order to address operational burdens due to COVID-19, the data collected will not align with previous and future fiscal years. This change will limit the information's use for developing an error rate and creating accurate corrective action. Also, the differing data will be less effective for establishing State agency liabilities. Furthermore, the changes in policies, including both State and Federal emergency interventions, cause changes in how we should review our QC sample. Staff will need to be re-trained and SNAP QCS may need to be reprogrammed to handle the novel blanket waivers. In addition to this, new interventions are being proposed and passed at a rapid pace which will be a continual change to our process.

Delay in timely normal operations. Moreover, once the shelter-in-place order is lifted and normal operations resume, we will see a misrepresentation of case accuracy and procedures as offices work to catch up and ramp up to full capacity. We estimate 3-6 months to catch up on caseload work and resume proper up-to-date operations after the lifting of a state of emergency. Furthermore, we will see an increase in caseloads for certifications that were pushed back 6 months (blanket waiver from FNS) which will cause a further delay in attaining normal operational timelines.

Best utilization of staff resources. Lastly, in this time of critical need, SNAP QC staff can be better utilized to serve our customers and support operations in order to ensure program access and integrity. They can also be used to develop and execute a more accurate methodology to assess errors and develop corrective actions for this unique time period.

10. **Anticipated impact on households and State agency operations:** This waiver will provide consistency to each case selected for the QC review process and improve our public health response to the spread of the coronavirus. We will also be able to allocate staff to operations and develop procedures to more accurately assess corrective actions and errors during the state of emergency.
11. **Caseload information, including percent, characteristics, and quality control error rate for affected portion:** The current number of households receiving SNAP in DC as of April 2020 is 76,444. Since the QC selection process involves a random sample of all active and negative cases, all households have the potential to be affected by this waiver. This will include all SNAP QC reviews in FY2020.
12. **Anticipated implementation date and time period for which waiver is needed:** This will start immediately upon approval of this waiver and will go through the end of FY2020.
13. **Proposed quality control review procedures:** Quality control reviews will begin on

October 1, 2020 under normal conditions.

14. Signature and title of requesting official:

Christi Dorsey c/o CP

Title: Christa Phillips, Chief Accountability Officer

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15. Date of request: April 13, 2020