



March 27, 2020

Mr. Eric Ratchford
Regional Director
SNAP Program
USDA/FNS/MARO
Mercer Corporate Park
300 Corporate Boulevard
Robbinsville, NJ 08691-1518

Dear Mr. Ratchford,

The District of Columbia (the District) Department of Human Services (DHS) Economic Security Administration (ESA) is submitting a **revised** request to provide Emergency Allotments to eligible Supplemental Nutrition Assistance Program (SNAP) households under section 2302(a)(1) of the Families First Coronavirus Response Act of 2020, Pub. L. No.116-127 (the Act) based on feedback provided by your staff.

During a conference call with Mid-Atlantic SNAP State agencies on March 24, 2020, the Food and Nutrition Service (FNS) provided their interpretation of section 2302(a)(1) of the Act as a supplement to increase existing SNAP households' monthly benefits to the maximum allotment for the household size. While ESA's Emergency Allotment request reflects FNS' interpretation, the District respectfully requests FNS reconsider the Act's authority. In the District, an estimated 48% of District residents receiving SNAP will see no additional benefits under FNS' interpretation. As FNS is aware, these are households with the lowest incomes who have no additional purchasing power for food. The District believes that all SNAP households are experiencing challenges in their ability to purchase food during the COVID-19 pandemic with scarce grocery store shelves limiting low-income households' option to purchase healthy and low-cost foods. Emergency allotments could mean the difference between being able to purchase remaining food items today versus staying hungry another week hoping stores are restocked.

Thank you for your consideration. If you have any questions, please do not hesitate to contact me at Anthea.Seymour@dc.gov or (202) 698-3906.

Sincerely,

A handwritten signature in blue ink that reads "Anthea Seymour" with a horizontal line extending to the right.

Anthea Seymour
Administrator

CC:

- Carla Drake, Acting Deputy Administrator, DPPDT&QA
- Garlinda Bryant-Rollings, Deputy Administrator, DPO
- Brian Campbell, Senior Policy Advisor, ESA
- Michael Ribar, Strategic Planning Officer, ESA

Request to Provide Emergency Allotments to Supplemental Nutrition Assistance Program (SNAP) Households

- 1. Type of request:** Initial
- 2. Statutory citation:** Section 2302(a)(1) of the Families First Coronavirus Response Act of 2020, Pub. L. No.116-127, effective March 18, 2020 (“the Act”)
- 3. State:** District of Columbia
- 4. Statutory requirements:** Section 2302(a)(1) of the Act directs the Secretary of Agriculture to provide for emergency allotments to SNAP households to address temporary food needs not greater than the applicable maximum monthly allotment for the household size upon request by a State agency that provides sufficient data supporting the request during a public health emergency declaration by the Secretary of Health and Human Services and issuance of an emergency or disaster declaration by a State based on an outbreak of COVID-19.
- 5. Description of alternative procedures:** The District of Columbia (District) is requesting to provide an emergency allotment to address temporary food needs to households. The value of each allotment will be equal to the delta between the current monthly household allotment and the maximum allotment for the household’s size. The District is requesting to issue emergency allotments for certified SNAP households in March and April contingent on an active public health emergency declaration in place by the United States Department of Health and Human Services and the Mayor of the District of Columbia.

The District understands contingent upon the availability of funding and ongoing need, the US Department of Agriculture (USDA) may approve additional months of emergency issuance with an extension request from the State.

Issuing Emergency Allotments to Current SNAP Households:

Emergency allotments will be issued in the following manner:

For March 2020 SNAP household:

- On a single date: April 3, 2020.
 - All ongoing SNAP households certified for March and newly certified households as of March 30.

In subsequent months, emergency allotments will be provided in accordance with the following schedule:

- April 10, 2020
 - All ongoing SNAP households certified for April and newly certified households as of April 10.

- April 17, 2020
 - All newly approved SNAP households certified after April 10.
- April 24, 2020
 - All newly approved SNAP households certified after April 17.
- May 1, 2020
 - All newly approved SNAP households certified after April 24.

The District will not be sending a written notice to clients due to the development time to modify the mass change notice. To notify eligible households, District will perform robo calls to all households indicating that the household will see a temporary increase to their benefits. Additionally, the District will make public announcements through our social media and our website.

All emergency allotments will be delivered on the household's Electronic Benefits Transfer (EBT) card. To achieve issuance of Emergency Allotments in the most expeditious and feasible manner due to limitations with our EBT vendor, the District will be leveraging the existing process to issue the emergency allotments as SNAP underpayments.

- For each customer, a manual underpayment will be created in our eligibility system equal to the Emergency Allotment amount and tagged with an indicator "Emergency Allotments."
- The manual underpayment will be automatically approved by the system.
- The manual underpayment record will be sent to our EBT vendor.
- The EBT vendor will load the manual underpayment amount on the customer's EBT card.
- The District will be able to track all underpayments tagged as "Emergency Allotments" to meet reporting and financial reconciliation requirements by FNS.

Reporting:

- FNS-292B: The District will submit a completed FNS-292B, Report of Disaster Supplemental Nutrition Assistance Benefit Issuance, 45 days after the last emergency allotment is issued.
 - While the District is not issuing D-SNAP benefits or supplements, the District will report the issuance of emergency allotments via the FNS-292B.
- FNS-46: The District plans to continue submitting the FNS-46, Issuance Reconciliation Report.
- FNS-388: The District plans to continue submitting the FNS-388, State Issuance and Participation Estimates.
- Weekly reports will be submitted to FNS with the following information:
 - Value of Emergency Allotments issued,

- Average issuance amount per household, and
- Number of households issued Emergency Allotments.

6. Justification for request: Pursuant to section 2302(a) of the Act, District SNAP households are eligible for emergency allotments because:

- The Secretary of Health and Human Services declared a Public Health Emergency under section 319 of the Public Health Service Act as a result of COVID-19 retroactive to January 27, 2020.¹
- The Mayor of the District of Columbia declared a Public Emergency and a Public Health Emergency as a result of the COVID-19 effective March 11, 2020, and extended on March 20, 2020.²
- Residents in the District are confirmed to have contracted COVID-19.
 - As of March 22, 2020, 32 residents have tested positive for COVID-19, a 220% increase from March 15, 2020.
- Many businesses in the District have closed or significantly reduced hours of operation.
 - On March 24, 2020, the Mayor of the District of Columbia ordered the temporary closure of non-essential business effective March 25, 2020 and expiring April 24, 2020.³
 - Major national retailers have closed stores in the District and across the country or reduced store hours.⁴ Closures or reductions in hours resulting in increased unemployment is evident based on dramatic increase in unemployment applications described below.
- District residents have experienced economic impacts due to job suspensions and losses.
 - The District has seen a dramatic spike in applications for unemployment, pointing to a massive increase in District residents losing jobs as a result of COVID-19. During the week of March 16, 2020, 16,000 applications for unemployment were submitted compared with an average of 500-600 per week prior to the March 2020.
- District residents have been directed to practice social distancing.
 - All Americans have been directed to practice social distance in accordance with the Centers of Disease Control (CDC) guidance.⁵
 - On March 24, 2020, the Mayor of the District of Columbia prohibited the gathering of ten or more people effective March 25, 2020 and expiring April 24, 2020.³

¹ Source: <https://www.phe.gov/emergency/news/healthactions/phe/Pages/2019-nCoV.aspx>

² Source: <https://mayor.dc.gov/sites/default/files/u23/Mayor%60s%20%20Order%202020-50.pdf>

³ Source:

https://coronavirus.dc.gov/sites/default/files/dc/sites/mayor/mb/release_content/attachments/Mayor%27s%20Order%202020-053%20Closure%20of%20Non-Essential%20Businesses%20and%20Prohibiti....pdf

⁴ Source: <https://www.usatoday.com/story/money/2020/03/17/coronavirus-store-closings-hours-changes-list/5068211002/>

⁵Source: <https://www.cdc.gov/coronavirus/2019-ncov/prepare/prevention.html>

7. Affected Caseload:

One month estimates for existing SNAP households under these procedures:

- Number of households receiving emergency allotment benefits: 32,000
- Amount of emergency allotment benefits issued for one month: \$6.7 million
- Number of months requested: Two (2) months

8. Anticipated implementation date: Two (2) business days from FNS' approval.

9. State agency submitting waiver request and State contact person:

Anthea Seymour
Administrator
Economic Security Administration
Department of Human Services
District of Columbia Government
64 NY Ave, NE, 6th Floor
Washington, DC 20002
(202) 698-3906
Anthea.Seymour@dc.gov

15. Signature and title of requesting official:



Name: Anthea Seymour
Title: Administrator, Economic Security Administration,
Department of Human Services, District of Columbia Government
Email for transmission of response: Anthea.Seymour@dc.gov

10. Date of original request:

March 26, 2020

Date of revised request:

March 27, 2020

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

Michael Ribar
Economic Security Administration
Department of Human Services
District of Columbia Government
64 New York Ave, NE, 6th Floor
Washington, DC 20002
(202) 442-9519
Michael.Ribar@dc.gov