



March 13, 2020

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

Dear Mr. Ratchford,

As the District of Columbia (the District) Department of Human Services (DHS) Economic Security Administration (ESA) responds to the effects of the Coronavirus Disease 2019 (COVID-19) to continue the administration of Supplemental Nutrition Assistance Program (SNAP), we are requesting flexibilities from the US Department of Agriculture (USDA) Food and Nutrition Service (FNS) to ensure the District's residents continue to receive SNAP benefits. As you are aware, the Mayor of the District declared a Public Health Emergency on March 11, 2020 in an effort to reduce the spread of COVID-19.

The District anticipates the following circumstances that may negatively impact the District's SNAP administration as a result of COVID-19:

- an influx of new applicants in the event of businesses closures and reduced economic activity;
- reduction in availability of staff who can process case actions such as SNAP applications, recertifications, and periodic reports; and
- increase traffic to our call center by customers taking precautions to avoid person-to-person interactions.

The District is requesting temporary waivers to ensure continued access to nutrition through more effective and efficient administration of the program under current conditions. Please find attached our second waiver request in response to the COVID-19 pandemic to allow streamlined eligibility for District residents in need of food assistance during our 60-day waiver request period, beginning Monday, March 16, 2020.

We appreciate FNS' consideration of the District's request and appreciate a prompt response to our request in order to start making necessary changes to our system, business process, and operating procedures in the event we experience a significant reduction in staff capacity. In addition, to expedite the review and decision process for ESA's request, we are available for a conference call at your earliest convenience to discuss our request. At this time, although open to considerations, DHS does not see any

alternatives and we do not want our residents to experience a significant lapse in access to essential health and nutrition resources during this pandemic crisis facing our nation.

Finally, we urge FNS to regularly share, through a weekly call or email, the flexibilities and guidance provided to other States that are preparing or implementing SNAP administration changes in response to COVID-19.

Thank you for your consideration. If you have any questions, please do not hesitate to contact me at [anthea.seymour@dc.gov](mailto:anthea.seymour@dc.gov) or 202-698-3906.

Sincerely,

A handwritten signature in cursive script that reads "Anthea Seymour" followed by a horizontal line.

Anthea Seymour  
Administrator

CC:

- Carla Drake, Acting Deputy Administrator, DPPDT&QA
- Garlinda Bryant-Rollings, Deputy Administrator, DPO
- Francine Miller, Chief Customer Officer, Office of the Director
- Brian Campbell, Senior Policy Advisor, ESA
- Michael Ribar, Strategic Planning Officer, ESA

## WAIVER REQUEST

1. **Waiver serial number (if request is extension):** N/A
2. **Type of request:** Initial/Retroactive
3. **Primary regulation citation:** Section (e)(3) of the Food and Nutrition Act of 2008, as amended, 7 CFR § 273.2(a)(2), 7 CFR § 273.2(e)(1), 7 CFR § 273.2(f), 7 CFR § 273.2(f)(1)
4. **Secondary regulation citation, if any:**
5. **State:** Washington, District of Columbia
6. **Region:** MARO
7. **Regulatory requirements:**
  - Section (e)(3) of the Act:** Requires the State agency to determine eligibility by verifying income, household size, and other eligibility factors determined by the Secretary.
  - 7 CFR § 273.2(a)(2):** Requires the application process include an interview and verification of certain information.
  - 7 CFR § 273.2(e)(1):** Requires households to have an interview with an eligibility worker at initial certification.
  - 7 CFR § 273.2(f):** Requires the State to use documentation or contact with a third party to confirm the accuracy of statements or information
  - 7 CFR § 273.2(f)(1):** Requires the State to verify, prior to certification, gross nonexempt income, alien eligibility, utility expenses, medical expenses, social security numbers, residency, identity, disability, household composition, student status, legal obligation and actual child support payments, and certain circumstances for able-bodied adults subject to the time-limit.
8. **Proposed alternative procedures:**

The District of Columbia (the District) Department of Human Services (DHS) Economic Security Administration (ESA) is requesting a waiver to certify new SNAP applications without an interview or mandatory verifications. After a customer drops off an application at one of our Service Centers, the application will be processed based on information on the application as attested to by the applicant. An interview will not be conducted, and any outstanding verifications will not be required in order to certify the applicant.

**9. Justification for request:**

The Mayor of the District declared a Public Health Emergency on March 11, 2020 in an effort to reduce the spread of COVID-19. The Mayor has directed agencies to protect staff and District residents by limiting person-to-person contact and slow the spread of the virus. As a result, the ESA Service Centers, the primary means of providing services to SNAP customers, have experienced an increased number of case workers calling out from work to take care of their children whose schools have closed, for medical reasons, or out of an abundance of caution. On Monday, March 16, 2020, we expect, at maximum, 33% of our caseworkers to show up for work. The District does not have the technical capacity to allow caseworkers to work remotely and does not have the technology to implement additional access points to allow customers to continue receiving benefits as outlined in FNS' SNAP Pandemic Planning Guidance.

The District primarily operates SNAP through our five (5) Service Centers located throughout the District. The majority of the District's SNAP customers come into one of the Service Centers in person to apply, drop-off verifications, conduct interviews, or to ask questions. These Service Centers currently serve 965 customers across all programs with 346 SNAP customers per day on average. Each staff person is able to serve approximately 6 SNAP customers per day.

In addition, we have a call center that conducts interviews and case inquiries. The call center fields 778 calls per day on average. Each call center staff person is able to field approximately 24 calls per day. ESA does not have an online application nor will it likely have time to procure, design, develop, and standup technology to achieve one imminently. The District also does not have the technology to accept electronic signatures over the phone, making telephonic applications impossible. In addition, while the District has been developing a mobile application to allow customers to submit verifications electronically, the mobile application is still being piloted and cannot be relied upon as an effective submission method.

The District is committed to ensuring all residents in need of food assistance during this unprecedented time can put food on the tables for their families. We anticipate an increase in new applicants for SNAP as wage earners are laid off from their jobs with the closing of local businesses in the area. To that end, ESA is planning to focus the remaining staff on getting new applicants their benefits as expeditiously as possible.

**10. Anticipated impact on households and State agency operations:**

If approved, this waiver will ensure District residents in need of food assistance are able to quickly obtain vital SNAP benefits needed to purchase food while helping to protect them from becoming infected with or spreading COVID-19 by removing any need to come into a Service Center.

Service Center operations will be severely limited to due staffing shortages and modified procedures to limit person-to-person contact in accordance with Department of Health guidance. This waiver will allow staff to focus on processing new applications.

**11. Caseload information, including percent, characteristics, and quality control error rate for affected portion:**

The waiver will affect all new SNAP customers.

- Over the last six months (Jul – Dec 2019), on average 3,126 customer apply for SNAP benefits each month.
- DC's most recent Quality Control Application Processing Timeliness rate is 95.83 percent (March 2019)
- DC's FY 2018 Quality Control Payment Error Rate is 16.33 percent

**12. Anticipated implementation date and time period for which waiver is needed:**

DHS is requesting approval of this waiver for a 60-day period.

Requested Approval Date: March 14, 2020

Implementation Date: March 16, 2020

Time Period: 60 days

**13. Proposed quality control review procedures:**

DHS' Quality Control will continue to review cases in accordance with current Quality Control procedures outlined in the FNS-310 Handbook.

**14. Signature and title of requesting official:**



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Anthea Seymour, Administrator

**15. Date of request: March 13, 2020**