

**DELAWARE WAIVER REQUEST
VERBAL ASSENT OF AUTHORIZED REPRESENTATIVE DESIGNATION**

- 1. Type of request:** Initial
- 2. Regulatory citation:** 7 CFR 273.2(n)(1)(i)
- 3. State:** Delaware
- 4. Region:** Mid-Atlantic Region (MARO)
- 5. Regulatory requirements:**

Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.2(n)(1)(i) allow for a non-household member to be designated as an authorized representative for the application process provided that the person is an adult who is sufficiently aware of relevant household circumstances and the authorized representative designation has been made in writing by a responsible member of the household.

6. Description of alternative procedures:

In order to accommodate the social distancing response to the current public health emergency, and to ensure that those without access to submitting a SNAP application online can have equal access to the program, the State of Delaware proposes to allow SNAP Outreach partners to serve as authorized representatives in completing and signing SNAP applications for households over the phone. In this critical time where the need for public service is increasing daily in Delaware, SNAP Outreach partners will assist applicants over the phone in outreach activities such as prescreening for benefits, completing the SNAP application and certification process, and securing needed verifications. This will allow for social distancing requirements in relation to Delaware's current State of Emergency declaration due to COVID-19.

The SNAP Outreach partners listed below will obtain verbal assent from the client over the phone to allow the SNAP Outreach partner to serve as the authorized representative for the purpose of signing the application only, without written designation. The SNAP Outreach partners will document the date and time of the client's assent in writing and record the assent in the comment field of the SNAP application. After the completion of each application, the SNAP Outreach partner would then be able to sign the application as the client's authorized representative and submit the application electronically through the State's online benefit portal, Delaware ASSIST (<https://assist.dhss.delaware.gov/>).

Upon receipt of an application submitted by a SNAP Outreach partner on behalf of a household, the Division of Social Services case worker will record the information about the client's designation of the authorized representative in the client's file in the ASSIST Worker Web eligibility system.

This adjustment will apply to the Delaware SNAP Outreach partners listed below:

- Food Bank of Delaware (FBD)
- Jewish Family Services (JFS)
- Modern Maturity Center (MMC)
- Delaware Ecumenical Council on Children and Families (DECCF)

The SNAP Outreach partners will continue to provide SNAP application assistance in accordance with 7 CFR 272.4(a)(2).

7. Justification for request:

Delaware is currently operating under a State of Emergency declaration which became effective March 13, 2020 and recognizes the need for adjustments due to the COVID-19 public health emergency. As authorized by the Families First Coronavirus Response Act (P.L. 116-127), Delaware's request of this adjustment is based on the determination that the adjustment is consistent with what is practicable under actual conditions in areas affected by the COVID-19 public health emergency. This adjustment will allow Delawareans the opportunity to maintain participation in SNAP while adhering to Delaware's Stay at Home order and social distancing requirements. Delaware is requesting approval for the period of three months, effective April 1, 2020, through June 30, 2020.

8. Conditions and reasons:

Delaware is requesting for approval of this adjustment subject to the following conditions:

- The State will continue to verify the identity of both the applicant and the authorized representative in accordance with 7 CFR 273.2(f)(1)(vii);
- Community partners and advocates utilizing this adjustment will inform the household that they are signing the application on behalf of the household and that the household can choose to submit the application itself through other means;
- Community partners and advocates designated as authorized representatives under this adjustment will be considered authorized representatives only for the purpose of signing the application, not for completing other parts of the application process, such as the interview or obtaining or using benefits on the household's behalf (community partners or advocates may continue to provide application assistance under 7 CFR 272.4(a)(2));
- Community partners and advocates who accept verbal assent must document in writing the date and time of the client's verbal assent of the authorized representative designation and record the assent in the comment field in the Delaware ASSIST application system (<https://assist.dhss.delaware.gov/>); and
- The State agency has the capacity to provide to FNS the data required for evaluation of the caseload.

9. Evaluation data requirements:

Delaware agrees to provide to FNS the data and analysis listed below required for evaluation of this adjustment.

- Estimated number of households affected by this adjustment;
- A narrative on the effect of program access and client satisfaction, including an analysis of any client or advocate complaints received related to the adjustment procedure;
- A narrative on the effect of providing timely and accurate benefits; and
- A narrative on the effect of any other aspects of the eligibility process, including the ability to manage staff caseload growth and the impact on administrative efficiency.

10. Anticipated implementation date and time period:

This adjustment will be implemented upon receipt of approval for the period of three months, effective April 1, 2020, through June 30, 2020.

11. Quality control procedures:

No special quality control procedures are required for cases subject to the provisions of this waiver. Cases may be reviewed using standard review procedures contained in the FNS Handbook 310.

12. Signature and title of requesting official:



Thomas Hall, Deputy Director
Delaware Division of Social Services

Email for transmission of Response: Thomas.Hall@delaware.gov

13. Date of request: April 27, 2020