



STATE OF WASHINGTON
DEPARTMENT OF SOCIAL AND HEALTH SERVICES
COMMUNITY SERVICES DIVISION
Economic Services Administration
Post Office Box 45440 Olympia WA 98504-5440

April 08, 2020

Charles Tobin, Program Director
Supplemental Nutrition Assistance Program
United States Department of Agriculture
Western Region, Food and Nutrition Service
90 Seventh Street, Suite 10-100
San Francisco, California 94103

Dear Mr. Tobin,

Re: Work Requirements and COVID-19 Precautions

In light of COVID-19, Washington State has been working diligently developing strategies to adjust our practices to best meet the needs of the individuals and families we serve.

To ensure our clients health and safety and aid in the fight of this global pandemic; we request a temporary waiver of Able-Bodied Adults without Dependents (ABAWD) work requirements outlined in [7 CFR §273.24](#), for the entirety of Washington State for the remainder of calendar year 2020. The State will reassess the economic impacts of the COVID-19 crisis in September when it submits its 2021 waiver request. This waiver is being requested due to the following challenges and conflicts associated in our ability to manage the current ABAWD rules, drastic changes to our economy, and the risk to public health:

- The federal injunction to the 2019 changes to the ABAWD waiver rules has allowed the state to continue to waive the majority of our state. However, the standing waiver still affects the over 8,000 ABAWDs in King County and should the injunction end prior to the end of the pandemic would have statewide impacts.
- The state is excusing ABAWDs unable to participate due to COVID-19 with Good Cause, while this process does provide benefits to clients. It requires monthly manual intervention due to the states inability to make long term decisions necessary in order to implement much needed IT support; as it is unclear how long this will be allowable under current guidance.
- Guidance from the Family First Coronavirus Response Act suggests that the State is able to waive the ABAWD time limit using the Act. However as an ABAWD Pledge state we are required to offer employment and training activities to all mandatory ABAWDs.

The State has taken necessary sweeping actions to protect Washingtonians and stop the spread of disease, including Governor Jay Inslee's [State of Emergency](#) proclamation, [Washington's Major Disaster Declaration](#), and most recently the expanded social distancing "[Stay Home, Stay Safe](#)" order that bans all non-essential travel outside of the home and for non-essential businesses to close.

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Following these bold but necessary lifesaving actions, Washington immediately began experiencing the economic impacts associated with an unprecedented reduction in employment and the complete closures of countless businesses.

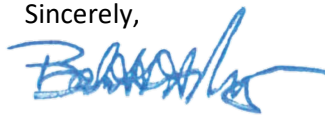
In preparation for the ABAWD work requirements set to take affect April 1, the State had collaborated with our partners at the State Board of Community and Technical colleges and Employment Security Department. Together we created opportunities for ABAWDs statewide to engage in work activities to meet work participation requirements. However, given the current environment our providers are no longer able to see clients face to face. Our partners have attempted to continue to provide services virtually, however many ABAWDs rely on public access to technology at libraries and community centers in order to participate. These resources have closed their doors due to social distancing requirements; eliminating access to virtual services.

In this environment continuing participation requirements would have harmful impacts to not only ABAWDs but all Washingtonian's as it weakens the State's ability to fight COVID-19. Providing the State this flexibility would allow us to:

- Ensure all financially eligible Washingtonians have vital access to SNAP benefits during the pandemic.
- Stop the spread of the virus due to ill or exposed clients continuing participation in the community in order to meet work requirements or requalify.
- Eliminate the choice ABAWDs must make between qualifying for food and their health and safety. Participating puts clients and their household members, who may have underlying health conditions, at risk.
- Make long term plans and leverage our workforce, also impacted by COVID-19, on essential service delivery functions.

We appreciate your consideration of our waiver request and look forward to your approval. If you have any questions, please feel free to contact Gus Williams by email at Gus.Williams@dshs.wa.gov.

Sincerely,



Babs Roberts, Director
Community Services Division

cc:

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