

## GEORGIA WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** Extension
3. **Regulatory citation:** Sec. 6(c)(l)(D)(i) of the Food and Nutrition Act; 7 CFR 273.2 (e); 7CFR 273.10(f)(5); 7 CFR 273.12(a)(5)(iii)(B); 273.14(a)(b)(3)
4. **State:** GEORGIA
5. **Region:** SERO
6. **Regulatory requirements:** Sec. 6(c)(l)(D)(i) of the Food and Nutrition Act states that a State agency may require households that report on a periodic basis to submit reports not less often than once each 6 months but not more than once each month except in certain circumstances.

Regulations at 7 CFR 273.2(e) require State agencies to conduct a face-to-face interview at initial certification and at least once every 12 months thereafter. This regulation also allows State agencies to conduct a telephone interview and requires State agencies to schedule an interview for all applicant households that are not interviewed on the day they submit their applications.

Regulations at 7 CFR 273.10(f) require State agencies to certify eligible households for a definite period of time. This regulation also states that the certification period cannot exceed 12 months except to accommodate a household's transitional benefit period and may certify households in which all members are elderly/disabled for up to 24 months.

Regulations at 7 CFR 273.12(a)(5)(iii)(B) require the submission of periodic reports by non-exempt households that are certified for longer than 6 months.

Regulations at 7 CFR 273.14(b)(3) require State agencies to conduct an interview with a member of the household or its authorized representative at least once every 12 months for households certified for 12 months or less. The provisions of §273.2(e) also apply to interviews for recertification.

**Proposed alternative procedures:** The President declared a National Emergency on March 13, 2020, and the U.S Department of Health and Human Services (HHS) continue to declare a national emergency due to the COVID-19 pandemic. Governor Kemp declared a Public Health State of Emergency for the state of Georgia on March 14, 2020 and has extended this

declaration through September 10, 2020. Georgia continues to be in a Public Health State of Emergency due to the (COVID-19-Coronavirus Pandemic).

Due to the coronavirus spreading from person to person, social distancing measures have taken place to prevent the spread of the virus. All social events throughout the state such as school activities, athletic events, church services and other social events have been cancelled or limited through September 10, 2020 as determined by the Governor of Georgia.

The state has 162,305 renewals due in September 2020. Of this number, the state is requesting to extend certification periods for 65,264 of these households that have a certification period ending in September 2020.

Households with an application date in April 2020 with a six month certification period ending in September 2020, and households with an application date in June 2020 with a four month certification period ending in September 2020 will have their certification periods extended on a staggered schedule to end in December 2020, January 2021, February 2021, and March 2021 respectively.

Households that had certification periods ending in March 2020 that received the six month extension to September 2020 will have their recertifications processed and completed in September 2020. The total number of renewals to complete in September 2020 is 97,041.

The state is requesting to waive the requirement to notify households of the certification end date, the notice of eligibility, the submission of the recertification form or periodic report form at the 6<sup>th</sup> and 12<sup>th</sup> month interim period, and the requirement to determine eligibility prior to assigning a new certification period.

The certification periods will be automatically extended by three (3), four (4), five (5) and six (6) months respectively to ensure case closures do not occur due to the household's inability to come to a DFCS office and submit paperwork and documentation to recertify for benefits. Additionally, the state wants to ensure it is able to balance its renewal workload due to the increase in cases during the COVID-19 pandemic.

All households given an extended certification period will be required to recertify for benefits by the end of their extension period if the recertification was due prior to or by the extension period.

#### **7. Justification for request:**

The state is requesting this extension to allow for completion of September 2020 renewals for households whose certification periods were previously

extended back in April and June 2020, so that the state can stay within a year of recertifying these households. It would also allow the state to even out renewals for upcoming months so that eligibility staff can handle the workload in a timely manner. Trying to complete 162,305 September renewals timely and accurately would be very difficult for the state to do; therefore, the state needs to have 65,264 renewals extended out over a three to six month period.

Eligibility staff are still teleworking and working remotely, so they will be able to process online applications offsite while the extension of certification periods will ensure current households continue to receive SNAP benefits to meet their nutritional needs.

This waiver will help the state to focus its effort on processing applications accurately and timely as the volume of online applications continue to increase while ensuring current households continue to receive benefits without any undue hardship or burden and few barriers to program access due to the COVID-19 pandemic.

#### Staggered Certification Period Schedule for September Recertifications

Households due for recertification in **September 2020** will have the following extension periods:

- October 2020 through December 2020 (three months).
  - October 2020 through January 2021 (four months)
  - October 2020 through February 2021 (five months).
  - October 2020 through March 2021 (six months).
8. **Caseload information, including percent of caseload and description of population expected to be affected by this waiver:** As of June 30, 2020, Georgia's SNAP caseload was 815,101 cases. This waiver will include SNAP cases in all 159 counties of the state. The state has 162,305 recertifications (renewals) due in September 2020.

The table below shows the total number of recertifications due for September 2020 and the total issuance for September 2020. The table also has a breakdown of recertification totals by extension month and total issuances by extension month.

<b>GEORGIA Total September 2020 Renewals Due</b>		
	<b>Total Sept Renewals Due</b>	<b>Total Issuance for Sept Renewals Due</b>
	162,305	\$46,207,645
	<b>Total Sept Renewals to Complete</b>	<b>Total Issuance for Sept Renewals to Complete</b>
	97,041	\$27,012,089
	<b>Total Sept Renewals Extended</b>	<b>Total Issuance for Sept Renewals Extended</b>
	65,264	\$19,195,556
<b>Staggered Renewal Extension Month</b>	<b>Total Renewals by Extension Month</b>	<b>Total Issuance for Renewals by Extension Month</b>
December 30, 2020	16,316	\$4,798,889
January 31, 2021	16,316	\$4,798,889
February 28, 2021	16,316	\$4,798,889
March 31, 2021	16,316	\$4,798,889
<b>Grand Total</b>	<b>162,305</b>	<b>\$46,207,645</b>

9. **Anticipated impact on households and State agency operations:**  
This waiver will ensure SNAP applicants and recipients continue to receive benefits and will allow timely processing of SNAP cases to ensure program access continues in a timely manner.
10. **Anticipated implementation date and time period for which waiver is needed (please indicate if the waiver approval is needed to make system adjustments):** Implementation of this waiver will begin immediately upon approval from the Food and Nutrition Service. This waiver is needed to make the required system changes to extend certification periods for September 2020 for SNAP households statewide.
11. **Proposed quality control review procedures:** There are no special quality control procedures required for cases subject to the provisions of this waiver. Cases will be reviewed using standard review procedures contained in the FNS

Handbook 310. Cases that are being reviewed for the months of extended certification periods will be reviewed under Section 752 (Expired Certification Periods) of the FNS Handbook 310.

**12. Date of request:** August 13, 2020

**13. Signature and Title of Requesting State Agency Official:**



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Jon. M. Anderson, Chief Deputy Division Director

Print Name/Title

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**15. Regional Office contact person (*to be completed by FNS regional office*):**