

DAVID Y. IGE  
GOVERNOR



PANKAJ BHANOT  
DIRECTOR

CATHY BETTS  
DEPUTY DIRECTOR

STATE OF HAWAII  
DEPARTMENT OF HUMAN SERVICES  
Office of the Director  
P.O. Box 339  
Honolulu, Hawaii 96809-0339

BESSD 20.D1201

March 19, 2020

Mr. Charles M. Tobin, Director  
Supplemental Nutrition Assistance Program  
Food & Nutrition Service  
Western Regional Office  
90 Seventh St., Suite 10-100  
San Francisco, California 94103

Dear Director Tobin:

As the State of Hawaii Department of Human Services (DHS) 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 Hawaii's Governor, Governor David Ige, issued an emergency proclamation on March 3, 2020 in an effort to reduce the spread of COVID-19.

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

- An influx of new applicants in the event of businesses closures and reduced economic activity; and
- Reduction in availability of staff who can process case actions such as SNAP applications, recertifications, and periodic reports; and

Hawaii anticipates 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 first waiver request in response to the COVID-19 pandemic to allow continuous eligibility for SNAP Hawaii residents whose periodic report or recertification is due during our 60-day waiver request period, beginning April 1, 2020.

We appreciate FNS' consideration of Hawaii's request and appreciate a prompt response to our request in order to start making necessary changes to our system, business process, and

Mr. Charles M. Tobin, Director  
March 19, 2020  
Page 2

BESSD 20.D1201

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 further questions regarding this request, please contact Mr. Scott Nakasone, Assistant Division Administrator, at (808) 586-7054 or email at [snakasone2@dhs.hawaii.gov](mailto:snakasone2@dhs.hawaii.gov).

Sincerely,



Pankaj Bhanot  
Director

c: Ms. Jacqueline Bourne, Senior Program Specialist  
Mr. Brian Donohoe, BESSD Administrator  
Mr. Scott Nakasone, Assistant BESSD Administrator

## WAIVER REQUEST

1. **Waiver serial number (if request is extension):** N/A
2. **Type of request:** Initial/Retroactive
3. **Primary regulation citation:** 7 CFR § 273.12(a)(5)(iii), 273.12(a)(5)(iv), section 3(f), and 11(e)(4) of the Food and Nutrition Act of 2008, as amended, and 7 CFR § 273.14.
4. **Secondary regulation citation, if any:**
5. **State:** Hawaii
6. **Region:** WRO
7. **Regulatory requirements:**

**7 CFR § 273.12(a)(5)(iii)(B).** Requires non-exempt households certified longer than 6 months to file a periodic report between 4 months and 6 months and those households certified between 13 and 24 months to file a periodic report once a year. The regulations require States to select a due date for the reports that allows the State sufficient time to process the reports so that households with reported changes that reduce/terminate benefit will receive adequate notice in the first month of the new reporting period.

**7 CFR § 273.12(a)(5)(iii)(D).** If a household files a periodic report resulting in a reduction/termination of benefits, an adequate notice must be sent by the State.

**7 CFR § 273.12(a)(5)(iii)(E).** If a household fails to file a periodic report by the due date, the State must send a reminder notice. If the household fails to reply to the reminder notice, the household's participation shall be terminated.

**7 CFR § 273.12(a)(5)(iv).** Requires the State Agency select a due date for the periodic report that allows the State sufficient time to process the reports so that households receive adequate notice of action on the report in the first month of the new reporting period. Requires the State agency to provide the household a reasonable period after the end of the last month covered by the report in which to return the report and benefits should be issued in accordance with the household's normal issuance cycle if a complete report was filed timely.

**Section 3(f) of the Act.** Defines that a certification period cannot exceed 12 months except for households in which all adults are elderly or disabled. Requires the State to have at least 1 contact with each certified household every 12 months.

**Section 11(e)(4) of the Act.** Requires that States ensure each participating household to receive a notice of expiration which notifies the household an application must be submitted to renew eligibility and, if filed 15 days prior to the end of the certification period, will receive an allotment no later than one month after the receipt of the last allotment issued.

**7 CFR § 273.14.** Indicates that no households shall participate beyond the expiration of its assigned certification period without a determination of eligibility for a new period. This section outlines application, verification, interview, notice, and processing requirements for the recertification process.

**8. Proposed alternative procedures:**

The State of Hawaii Department of Human Services (DHS) is requesting a waiver to continue eligibility for households due for a periodic report or recertification. At periodic report, regardless if a household submitted their periodic report, the household would continue receiving benefits for the remainder of the certification period. At the end of the recertification period, regardless if a household submitted a recertification application, conducted an interview or submitted required verifications, the household would be automatically renewed for a new certification period based on the household's circumstances at the time of recertification.

**9. Justification for request:**

Hawaii's Governor, Governor David Ige, issued an emergency proclamation on March 3, 2020 in an effort to reduce the spread of COVID-19. At that time, the Governor directed agencies to protect staff and residents by limiting person-to-person contact and slow the spread of the virus. On March 17, 2020 Governor Ige instructed all State offices to reduce the number of staff that report to work for a 15-day period to further protect all staff and Hawaii residents from the spread of COVID-19. As a result of this, effective March 20, 2020 we will have reduced the numbers of staff in our Processing Centers to serve the public. We will have an estimated 42 Eligibility Workers and 28 Office Assistants statewide reporting to our offices for work to service clients who walk-in that don't have a phone, answering calls to the Processing Center, processing applications and on-going cases, scanning documents and entering information into our workload manager. This represents approximately 18% of our workforce.

Hawaii does not have the technical capacity to allow eligibility workers 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.

Our State operates SNAP through a total of fourteen (14) Processing Centers located throughout the State. The majority of our lobby traffic consists of applicants and clients who apply for benefits, drop-off verifications, conduct interviews, or to ask questions.

These Processing Centers currently serve approximately 9,852 individuals statewide per month across all programs with an average of 447 SNAP participants per day. Each staff person is able to serve approximately 8 SNAP customers per day.

In addition, staff in the Processing Centers answer calls to conduct interviews and respond to questions about cases. The Processing Centers respond to approximately 992 calls and 682 voicemail messages statewide per day on average. Assigned staff are able to answer approximately 18 calls per day. The State does not have an online application nor will it likely have time to procure, design, develop, and standup technology to achieve one imminently. The State also does not have the technology to accept electronic signatures over the phone, making telephonic applications impossible. While the State allows clients to submit verifications electronically to the Processing Center's e-mail address, staff need to review the documentation and import it into the client's electronic case record.

Hawaii 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, Hawaii is planning to focus the remaining staff on getting new applicants their benefits as expeditiously as possible. Ensuring existing customers, whose periodic report and recertifications are due during the waiver period, continue to receive their benefits will allow caseworkers to focus on new applications and increase the capacity to answer inquiries from our client base and the general public.

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

If approved, this waiver will ensure current Hawaii residents continue to receive vital food benefits while helping to protect them from becoming infected with or spreading COVID-19 by removing any need to come into a Processing Center.

Processing Center operations will be severely limited due to 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 on-going SNAP customers with a periodic report or recertification due.

- Over the last six months (Jul – Dec 2019), on average 4,926 households are due for recertification per/month with 4,659 completing their recertification.
- Over the last six months (Jul – Dec 2019), on average 4,508 households' periodic reports are due each month with 2,737 completing their periodic reports.

- Hawaii's 2019 Quality Control Application Processing Timeliness rate is 97.04 percent
- Hawaii's FY 2018 Quality Control Payment Error Rate is 4.48 percent

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

Hawaii is requesting approval of this waiver for a 90-day period.

Requested Approval Date: March 23, 2020

Implementation Date: April 1, 2020

Time Period: 90 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:**



---

Scott Nakasone, Assistant Administrator

**15. Date of request: March 19, 2020**