

DAVID Y. IGE  
GOVERNOR



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DIRECTOR

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DEPUTY DIRECTOR

STATE OF HAWAII  
**DEPARTMENT OF HUMAN SERVICES**

Office of the Director  
P.O. Box 339  
Honolulu, Hawaii 96809-0339

BESSD 20.D1202

March 25, 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 emergency proclamations on March 3, 16, 21 and 23 of 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 two (2) waiver requests in response to the COVID-19 pandemic to allow continuous eligibility for our students that receive SNAP benefits, and to allow unsigned applications to be processed.

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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 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.

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. Elizabeth Albert, Supervisory Program Specialist  
Ms. Jacqueline Bourne, Senior Program Specialist  
Mr. Brian Donohoe, BESSD Administrator  
Mr. Scott Nakasone, Assistant BESSD Administrator

## WAIVER REQUEST

### Office Operations and Application Processing

1. **Type of Request:** Initial
2. **Primary Citation:** 7 CFR §273.2 (c)(7)(iii)
3. **Secondary Regulation Citation:** N/A
4. **State:** Hawaii
5. **FNS Region:** WRO
6. **Regulatory Requirements:** 7 CFR §273.2 (c)(7)(iii) The State agency shall decide whether unwritten signatures are generally acceptable. The State agency may decide to accept unwritten signatures....
7. **Proposed Alternative Procedures:** Hawaii is requesting a waiver to allow applicants and reapplicants to submit applications for assistance by completing an electronic version of a hard copy application, saving their completed electronic application, and then submitting their application via a designated email address. Applications that are received unsigned will be confirmed by an eligibility worker through a telephone contact with the applicant, and in lieu of voice recording technology, the confirmation shall be documented in the case record and shall serve as the applicant's signature.
8. **Justification for Request:** Due to the COVID-19 pandemic, an emergency proclamation mandates closure of restaurants, bars, and entertainment and recreational facilities across the state of Hawaii. Due to the evolving situation, Hawaii recognizes the increase need of assistance by those impacted by COVID-19 related closures. Compounding this situation is the instruction to State agencies to implement social distancing in the work place by limiting the number of staff that report to work, and to encourage telework where possible. This has resulted in Processing Centers operating with 18% of its workforce on any given day. Hawaii has begun to attempt to implement telework for its eligibility workforce, however the limited amount of available equipment and experience with telework will not make a significant impact in addressing the increase in applications and reapplications in the short term and would result in backlog in the long term.

Allowing for implementation of Hawaii's request will allow our reduced staffing to process applications quicker and more timely as it would eliminate the need to pend an application because of no signature, return the application to the applicant to sign, and then resuming application determination. Allowing Hawaii's request would also reduce the need for face-to-face interaction between the eligibility worker and the applicant which aligns with the practice of social distancing.

Though we are pursuing this waiver in response to COVID-19, Hawaii would prefer to have this waiver be approved until our replacement eligibility system is built and able to receive on-line applications. The original estimated date for completion was Fall of 2021, however due to current circumstances there will be an expected delay for completion.

- 9. Anticipated Impact on Households:** Allowing for approval and implementation of Hawaii's request will allow for processing applications quicker and more timely as it would eliminate the need to pend an application because of no signature, return the application to the applicant to sign, and then resuming application determination. This process has an inherent effect of delaying application processing.

This process would also eliminate the need for applicants to come into our Processing Centers unnecessarily and placing themselves for possible exposure to COVID-19 to sign their application.

- 10. Affected Caseload:** The current SNAP statewide caseload is 79,000, which equates to 152,000 individuals receiving SNAP. Thus far Hawaii has seen an increase of 37% of applications received compared to what has been experienced prior to Governor David Ige's 1<sup>st</sup> Emergency Proclamation for COVID19 on March 5, 2020. Due to the uncertainty of the situation it is expected that caseloads will continue to increase though it is difficult to predict how much and for how much longer.
- 11. Anticipated Implementation Date:** Hawaii anticipates implementation of the waiver as of March 23, 2020 as a result of the Governor David Ige's 3<sup>rd</sup> Emergency Proclamation for COVID19 for closure of various restaurants, bars, and facilities.

- 12. Proposed Quality Control Procedures:** The proposal does not affect quality control sampling or procedures.

- 13. Signature and Title of Requesting Official:**



Scott Nakasone  
Assistant Division Administrator

- 14. Date of Request:** March 25, 2020