

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** Initial due to COVID-19 emergency
3. **Statutory citation:** Families First Coronavirus Response Act
4. **Regulatory citation:** 7 CFR 273.10(f)(1), (3), and (5)
5. **State:** Iowa
6. **Region:** MWRO
7. **Regulatory requirements:**

The Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.10(f)(3) provide that the State agency must certify each eligible household for a definite period of time. State agencies must assign the longest certification period possible based on the predictability of the household's circumstances. The first month of the certification period will be the first month for which the household is eligible to participate. The certification period cannot exceed 12 months except to accommodate a household's transitional benefit period. Federal rule 7 CFR 273.10(f)(1) provides that a State agency may certify for up to 24 months households in which all adult members are elderly or disabled. Additionally, 7 CFR 273.10(f)(5) provides State agencies the ability to lengthen a household's current certification period once it is established, as long as the total months of the certification period do not exceed 24 months for households in which all adult members are elderly or disabled, or 12 months for other households. If the State agency extends a household's certification period, it must advise the household of the new certification ending date with a notice containing the same information as the notice of eligibility set forth in paragraph (g)(1)(i)(A) of this section.
8. **Description of alternative procedures:**

Iowa is requesting a waiver of the regulatory requirement and proposes to extend all certification periods by an additional six months for recertifications that become due during the time Iowa is under a state of emergency due to the COVID-19 health crisis. Additionally, the waiver would not require Iowa to send a notice to households regarding the extended certification period. Rather, Iowa would not send the notice of expiration until it would be due under the extended certification period.

9. Justification for request:

This request is justified pursuant to the Families First Coronavirus Response Act and 7 CFR 272.3(c) (1)(ii) which permits FNS to authorize waivers that result in a more effective and efficient administration of the program. The approval of this waiver will ensure Iowa can respond quickly to the increase in demand for SNAP benefits as a result of this health crisis.

On January 31, 2020, the International Health Regulations Emergency Committee of the World Health Organization declared the outbreak of COVID-19 a public health emergency of international concern as well as Health and Human Services Secretary, Alex M. Azar II, declared a public health emergency for the United States. On March 13, 2020, President Trump declared a national state of emergency over the COVID-19 pandemic. In addition, the Governor of Iowa, Kim Reynolds, declared a state of emergency of the entire state of Iowa on March 17, 2020 to protect the well-being of the citizens of Iowa from the dangerous effects of COVID-19.

Approval of this waiver will assist in protecting the lives, safety and health of the citizens of Iowa due to limiting personal contact (social distancing) to help prevent the rapid spread of this virus. It will allow county agencies to focus only on new SNAP applications as they continue to be received. Further, while the number of applications increases, the current workforce level to process the work, already strained, is at risk of becoming unsteady. Minimizing the number of cases that have to be “worked” in order for individuals to maintain SNAP benefits is crucial. We are requesting a six-month extension for all recertifications because only extending recertifications to the month after the state of emergency ends will overwhelm the county agencies and make the recovery from this pandemic continue over a longer period of time.

10. Anticipated impact on households and State agency operations:

This waiver will allow currently certified households that become due for a recertification during the state of emergency to continue to receive SNAP for an additional six months without the need to redetermine eligibility. This will help prevent exposure of our customers, as well as state and county employees, to COVID-19. Additionally, this will allow county agencies to focus only on new SNAP applications as they continue to be received. Further, while the number of applications increases, the current workforce level to process the work, already strained, is at risk of becoming unsteady.

11. Caseload information:

As of February 2020, Iowa was serving 144,817 SNAP households and 296,438 individuals.

For the immediate months of March 2020 through May 2020, Iowa has a total of 56,864 cases whose SNAP certification is expiring. This waiver will allow us to extend those certification periods so those households do not need to go through the recertification process in order to receive continued benefits.

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

Iowa requests to implement this immediately to recertify all households with current end certification dates of March 2020, April 2020 and May 2020. These certification periods will be extended through September 2020, October 2020, and November 2020, respectively.

If additional extensions of this waiver are necessary for future months due to an ongoing health crisis, they will be requested as necessary.

13. Proposed quality control review procedures:

Iowa requests hold-harmless provisions for all pandemic-related waivers approved by USDA.

14. Signature and title of requesting official:

e-signed: *Janee Harvey*

Name: Janee Harvey

Title: Division Administrator, Adult, Children and Family Services

Email for transmission of response: Jharvey1@dhs.state.ia.us

15. Date of request:

3/23/2020

16. State agency staff contact (name/email/telephone):

Food Assistance Program Manager: Kari Lind, klind@dhs.state.ia.us, 515-281-7000

17. Regional office contact person (to be completed by FNS regional office): Tina Kopec, Christina.kopec@usda.gov