

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 273.5
5. **State:** Iowa
6. **Region:** MWRO
7. **Regulatory requirements:**

Regulations at §7 CFR 273.5(a) state that an individual who is enrolled at least half-time in an institution of higher education shall be ineligible to participate in SNAP unless the individual qualifies for one of the exemptions contained in paragraph (b) of this section. An individual is considered to be enrolled in an institution of higher education if the individual is enrolled in a business, technical, trade, or vocational school that normally requires a high school diploma or equivalency certificate for enrollment in the curriculum or if the individual is enrolled in a regular curriculum at a college or university that offers degree programs regardless of whether a high school diploma is required.
8. **Description of alternative procedures:**

Iowa requests to waive the additional student requirements during the COVID-19 health crisis. Any student who was deemed eligible based on work is likely not able to work at this time. This could be because they are now studying online and had to move away from the town the job is in, they work in one of the many industries that are in virtual shutdown, or any other reasons outside of their control.

In addition to students who were previously deemed eligible, we would like to waive the additional requirements for any students who may need assistance due to loss of income.
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.

10. Anticipated impact on households and State agency operations:

This waiver will ensure that individuals who are trying to better themselves through education are not denied critical benefits during the COVID-19 health crisis.

It is our understanding that the intent of the regulations is that only those students who are attempting to support themselves should be allowed to participate in the program. When students do not have the ability to do that because businesses are closing down and they are being told to practice distancing, they should not be held to a higher standard than the rest of the general population.

11. Caseload information:

As of February 2020, Iowa was serving 144,817 SNAP households and 296,438 individuals. We do not have an indicator to show which ones are eligible students, so the exact number of affected individuals is unknown.

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

Immediately until the COVID-19 health crisis has passed.

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):