

From: [Henschel, Matthew - FNS](#)
To: [Gersten-Paal, Sasha - FNS](#); [McKenney, Alice - FNS](#); [SM.FN.SNAP-PDD-COVID](#); [Luna, Jessica - FNS](#); [Dasgupta, Arpan - FNS](#)
Cc: [Griffin, Laura - FNS](#); [Patyk, Karen - FNS](#); [Brathwaite, Bonnie - FNS](#); [Krebs, Ashley - FNS](#); [Pasquaretta, Kevin](#); [Milliken, Caroline - FNS](#)
Subject: COVID - NY July cert period waiver - data needed
Date: Thursday, June 4, 2020 12:32:10 PM

Greetings,

NY has submitted additional data in support of its pending request to adjust PRFs and cert periods for July.

Please let us know if you have any questions or need any additional information.

Best,

Matt

From: HEDDERMAN, TOM (OTDA) <Tom.Hedderman@otda.ny.gov>
Sent: Thursday, June 4, 2020 12:23 PM
To: Henschel, Matthew - FNS <matthew.henschel@usda.gov>
Cc: Brathwaite, Bonnie - FNS <bonnie.brathwaite@usda.gov>; GASKELL, JEFF (OTDA) <Jeff.Gaskell@otda.ny.gov>; Demarco, Wendy (OTDA) <Wendy.DeMarco@otda.ny.gov>; Gatchell, Tracy (OTDA) <Tracy.Gatchell@otda.ny.gov>
Subject: RE: Cert period waiver - data needed

Matt,

Here is some additional information. It pertains to New York City where the need for this waiver remains the greatest. Please let me know if you have any questions.

Tom

PA-SNAP Applications

Total in pending status: 8,896
Total in pending status and overdue: 394
New Apps filed daily (avg of last 5 days): 1,066
Apps coming due daily (avg of next 5 days): 35

SNAP Applications

Total in pending status: 45,093
Total in pending status and overdue (not eligible for expedited): 6,628
Total in pending status and overdue (expedited eligible): 189
New Apps filed daily (avg of last 5 days): 2,177
Non-expediteable Apps coming due daily (avg of next 5 days): 1,017

Note: The \$600 weekly Pandemic Unemployment Compensation that was extended to

those eligible for unemployment benefits is due to expire on July 31, 2020. Past experience has shown that this will lead to an increase in applications for SNAP benefits and further stretch already overburdened system and workforce.

Recertifications Coming Due

NYC has 38,790 SNAP-only cases with certification periods expiring 7/31/20, NYC has an additional approximately 15,000 PA-SNAP cases with certification periods expiring 7/31/20

- NYC is still working to complete the extraordinary volume of applications received. While they have made significant progress, we are still addressing the increased volume and recovering from the reduced staffing levels at the beginning of the pandemic due to staff illnesses and deaths. Resuming recertifications will mean that applicants and clients will wait longer for benefits.
- Prior to the pandemic, almost all application and recertification interviews for SNAP-only applications and cases and the initial work on eligibility determinations were conducted out of two large Telephone Interview Processing Services (TIPS) Centers. In order to transition New York City Department of Social Services (NYC DSS) employees to a work from home environment the on-demand system had to be taken down since it cannot operate remotely. The system cannot be re-operationalized until TIPS Center staff can safely return to work.
- The TIPS centers still cannot be re-opened, even with partial staffing. The TIPS Centers are high density, open offices with narrow passages and cubicles less than six feet apart. Most staff rely on public transportation to commute to and from their jobs at these centers. Solutions for re-designing and re-configuring the centers to conform with recommended social-distancing protocols, and solutions to the logistics of safely transporting staff to and from the centers are being developed, but have not been completed and public health circumstances are not yet suitable for their implementation.
- As noted above, unless an in-person interview is requested, all New York City SNAP-only application and recertification interviews were on-demand. All scheduling notices, reminder notices and Notices of Missed Interview (NOMIs) for new applications reference the on-demand process. All Notices of Expiration/Recertification (NOEs), recertification reminder notices and NOMIs for SNAP-only cases with expiring certification periods also reference the on-demand interview process. Because the on-demand interview process cannot be operated outside of the TIPS center environment and the systems at those centers that make the on-demand operations possible, all notices related to the application and recertification processes would need to be changed, translated and re-programmed. This would require a substantial systems development effort at a time when scarce and shared IT resources are fully engaged in responding to the effects of the pandemic – e.g., standing up a P-EBT program.
- If the certification period is not extended, and the longer a decision to permit us to do so is delayed, the more unnecessary confusion that results for clients. Because of the enormous volume of recertifications that have to be conducted each month, the recertification cycle for every recertifying cohort occupies the full two months prior to the end of the certification period. NYC DSS and NYC SNAP recipients with certification periods expiring in July have a an

increasingly shorter period of time to get recertification applications filed, and find a means of completing interviews outside of the on-demand process. NYCDSS needs time to properly and adequately communicate to clients that there will be no further extensions.

- For July, we would expect a far lower than normal attrition rate for recertifications than occurred prior to the pandemic. Typically, many households with improved economic circumstances who conclude that they no longer want or will qualify for SNAP decide not to file applications for recertifications. Given the losses of jobs and income that have resulted from the pandemic, we believe that a substantial portion of those who otherwise would have failed to recertify will recertify, resulting in higher than normal recertification volumes.