STATE WAIVER REQUEST: Core Verification and Interview Adjustment

1. **Waiver Serial Number (if applicable):**

2. **Type of request:** Extension

3. **Regulatory citation:** 7 C.F.R. 273.2(a)(2), 7 CFR 273.14(b)(3) and 273.2 (e)(2)

4. **State:** Oregon

5. **Region:** Western Region Oregon

6. **Regulatory requirements:**
   Regulations at 7 C.F.R. 273.2(a)(2), 7 C.F.R. 273.14(b)(3) and 7 C.F.R. 273.2(e)(2) requires that the application process include an interview, interview households for eligibility before certifying and as part of the recertification process.

7. **Proposed alternative procedures:**
   Oregon intends to use the no interview as a last resort process. Oregon will continue to reach out to applicants and recipients via phone to complete an interview for benefits. However, these waivers grant us the flexibility to manage the workflow by giving the option to process benefits if workers have all the information needed and are not able to reach the individual for an interview as a last resort.

   Oregon is requesting these waivers to enable the agency to stay on top of the current workload demand, to allow the workforce to prepare for the anticipated increased workload demand and to continue to keep our staff and SNAP participants safe through sustained physical distancing practices

8. **Justification for request:**
   The Secretary of Health and Human Services emergency declaration continues to be in place and Oregon has an emergency order that extends into September 2020[1]. Oregon continues to experience an increased workload which must be managed while operating under temporary modified business processes (including ongoing workforce issues and the rollout and implementation of a new SNAP Online Application and eligibility system).

   Increase in workload:
   - 55% increase in anticipated recertification applications for the month of September 2020, compared to the same month in 2019 (see Appendix A). Furthermore, a 64% increase in interim change reports for the same time frame (see Appendix B).
   - Oregon experienced a 30% increase in new applications in May, June and July 2020 compared to the same time period in 2019 (see Appendix C).

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   [1] Office of the Governor, State of Oregon, Executive Order Number 20-30.
   https://www.oregon.gov/gov/admin/Pages/eo_20-30.aspx

- We continue to see spikes in application counts from May 2020 through the beginning of August 2020 with an increase in applications during the first week of August as previously anticipated. (See Appendix D)
- Oregon experienced a 20% increase in total cases and 19% increase in total SNAP participants for the month of July 2020, compared to the same month in 2019 (see Appendix E).
- As of July 2020, 35% of the SNAP caseload includes an elderly and/or disabled person. (See Appendix F)
- We are seeing the beginning of another surge in SNAP applications as a result of Pandemic Unemployment ending in July 2020. (See Appendix D)
- The attached data does not include the programmatic and workforce lift required to run the new Pandemic EBT program. This data does not reflect the work our eligibility workers need to perform to process reported changes and other actions by participants in between certification periods and responding to queries received from participants about their benefits. .

Workforce Challenges:
- As of July 2020, 62% of Oregon eligibility staff continue to work remotely;
- Week of July 29 to August 05, 22% of eligibility staff were absent; and
- State budget shortfalls have resulted in hiring freezes which will further limit staff capacity in future months (see Appendix F).

Oregon new SNAP online application and eligibility system (ONE) roll out
- To help manage the workload and successful rollout of the new SNAP online application and ONE Integrated Eligibility system, Oregon is requesting to continue the above waivers through December 2020.
- The first pilot area was rolled out first week of August 2020 and additional waves (geographical areas) are planned for rollout in November 2020 and February 2021 (see Appendix G).

We know that as staff learn the new system our intake times for SNAP have increased. On average with the soft rollout we are seeing a temporary increase in intake times as staff navigate the new integrated system. As staff become familiar and as SNAP participants are loaded into the new system this timing will improve.

9. **Caseload information, including percent of caseload and description of population expected to be affected by this waiver:**
Oregon's SNAP caseload for July 2020:
Cases: 418,178
Participants: 702,882
Cases containing elderly members: 103,017

10. **Anticipated impact on households and State agency operations:**
Oregon anticipates that implementation of this waiver will result in time savings for eligibility and administrative workers. This process will improve timeliness of

benefits while reducing the risk of transmission of the virus due to the decreased contact an applicant will be required to have with the agency.

11. **Anticipated implementation date and time period for which waiver is needed (please indicate if the waiver approval is needed to make system adjustments):**

    Oregon is requesting to extend these waivers for September 2020 to December 2020.

12. **Proposed quality control review procedures:** N/A

13. **Name, title, and email of requesting official:**
    Name: Dan Haun
    Title: Self Sufficiency Programs Director
    Email: DANIEL.R.HAUN@dhsoha.state.or.us

14. **Date of request:** 08/12/2020 (follow up from request submitted 08/10/2020)

15. **State agency staff contact:**
    Name: Heather Miles
    Title: Self-Sufficiency Programs – Design Program Manager
    Email: HEATHER.J.MILES@dhsoha.state.or.us

16. **Regional Office contact person (*to be completed by FNS regional office*):**

Appendix A – Recertification Counts: 2019 versus 2020

September	Recertifications
2019	27,856
2020	43,127

43,127 - 27,856 / 27,856 x 100 = 55% increase

Appendix B – Mid-Certification Reports Due

September	Interim Change Reports
2019	21,674
2020	35,555

35,555 - 21,674 / 21,674 x 100 = 64% increase

Appendix C – New applications and recertifications, leveraging FNS-366B data

Initial Applications	Counts
April May and June 2019	62,444
April May and June 2020	80,927

Appendix D - Weekly Application Counts from May through the first week of August 2020

Week of	Applications
5/3/2020	6,448
5/10/2020	5,672
5/17/2020	4,774
5/24/2020	19,983
5/31/2020	4,602
6/7/2020	4,237
6/14/2020	4,239
6/21/2020	4,275
6/28/2020	20,327
7/5/2020	5,141
7/12/2020	5,594
7/19/2020	5,171
7/26/2020	5,987
8/2/2020	8,487

Appendix E – SNAP participation data January 2020 – July 2020

This graph demonstrates SNAP caseload information for cases that include person(s) 60 and older.

Total Cases	Year	January	February	March	April	May	June	July
	2019	353,560	349,948	349,604	349,537	349,737	349,024	348,528
	2020	345,721	346,178	359,017	395,848	405,104	411,918	418,178
Percent change		-2%	-1%	3%	13%	16%	18%	20%

As of July 2020, the total number of cases with an elderly and/or disabled person is 159,384. This translates to 35% of the SNAP caseload.

Total Recipients	Year	January	February	March	April	May	June	July
	2019	607,135	599,975	597,775	596,165	595,284	593,129	591,697
	2020	581,867	581,288	601,101	665,156	681,125	692,588	702,882
Percent change		-4%	-3%	1%	12%	14%	17%	19%

Appendix F – Oregon DHS Workforce
The table below demonstrates the current staffing levels for eligibility workers. Current trends show that we are consistently working at a deficit and demonstrates the need for waiver flexibilities.

Date	Workers Statewide	Workers Out Statewide	Workshare Staff	Workshare Out	Virtual Eligibility Center Workers	Virtual Eligibility Center Absent
07.29.2020	632	112	32	3	324.5	60.5
07.30.2020	577	117	13	1	323	60
07.31.2020	432	158	14	7	285	99.5
08.03.2020	554	125	29	7	300.5	85.5
08.04.2020	497	96	28	5	313.5	72.5
08.05.2020	552	80	32	8	315	73.5
Total Workers	3244	688	148	31	1861.5	451.5
% Workers Out		21%		21%		24%
OVERALL WORKFORCE					5253.5	1170.5
Total % Workers Out						22%