

WAIVER REQUEST

1. Waiver serial number (if request is extension):

COV-004

2. Type of request:

Renewal

3. Primary regulation citation:

7 CFR 273.10(f)(5)

4. Secondary regulation citation, if any:

7 CFR 273.12(a)(5)

5. State:

Pennsylvania

6. Region:

Mid-Atlantic

7. Regulatory requirements:

Regulations at 7 CFR 273.10(f)(5) provide that the State must certify eligible households for a definite period of time. Certification periods may not exceed 12 months except for households that are composed of all elderly or disabled members. These households may be certified for up to 36 months.

Regulations at 7 CFR 273.12(a)(5) provide that a household is enrolled in simplified reporting and required to report any changes on their Semi-Annual (SAR) forms.

8. Proposed alternative procedures:

An extension of the certification period will be granted to SNAP households with a recertification due in the month of July 2020 to January 2021 due to limitations in staffing availability due to the coronavirus (COVID-19) pandemic. The certification period will be extended beyond 36 months for elderly/disabled households and 12 months for all other households.

For all active SNAP households that have a SAR due, Pennsylvania is requesting a delay in action for those cases in which processing difficulties are encountered.

Pennsylvania is requesting to renew this waiver statewide because while some counties have begun re-opening their businesses, the County Assistance Offices (CAOs) are still closed to the public and working with limited onsite staff while the remaining staff are teleworking. By extending the certification period until the CAOs are adequately staffed and prepared to accommodate the additional workload as a result of increased unemployment due to COVID-19, these caseworkers will be able to focus their efforts on completing SNAP applications that are being received. This ensures that SNAP households in all counties continue to receive their benefits in a timely fashion. This waiver would be in place until July 31, at which time CAOs may be ready to begin normal procedures.

9. Justification for request:

This request is justified pursuant to 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 extension would allow DHS to ensure households continue to receive their SNAP benefits during this pandemic.

DHS currently has approximately 55,000 SNAP recertifications due in July with an additional 44,000 Semi-Annual Report (SAR) forms due. While these items are generated systematically with minimal action by CAO staff, when the items and pending information are provided to the CAO, the onsite staff must take the time to scan any submitted documentation into the Client Information System's (CIS) Imaging repository, then classify the items and notify the appropriate caseworker to take any necessary actions on the case. A majority of CAO staff are currently teleworking, per the Governor's mandate and in conjunction with the Centers for Disease Control and Prevention (CDC) and Pennsylvania's Department of Health (DOH) social distancing guidelines, leaving minimal onsite staff at the CAO. These staff remain at the CAO to complete the tasks necessary for the CAO to complete its normal duties. These tasks include monitoring CAO phone lines and messaging systems, opening mail and scanning documents into CIS for applications and other reported changes, registering and scanning any hard copy applications received in the office, and printing Electronic Benefits Transfer (EBT) cards and overnight mailing the card to households that are determined eligible for Expedited SNAP benefits so that these households are still able to access their benefits within 5 calendar days.

In addition to the SNAP applications and the related tasks previously discussed in this waiver, CAO staff must also work to process Temporary Assistance for Needy Families (TANF) and Medical Assistance (MA) applications and the similar tasks necessary for processing those applications. Beyond applications,

there are approximately 109,000 MA renewals due for the month of August. The combined workload of handling applications and the duties related to processing these applications in tandem with other duties the onsite CAO staff must complete means that recertifications and SAR forms may not be able to be processed in a timely manner, which could result in eligible households losing benefits and having to be reauthorized, which creates additional work for the CAOs. This creates an ever expanding cycle of additional work that CAOs will be unlikely to fully recover from until months after they have returned to full onsite staffing. It also is likely to result in higher churn rates for SNAP households during a period where SNAP benefits are a critical resource for these families.

10. Anticipated impact on households and State agency operations:

This waiver will prevent benefits from ending during this health crisis because offices are closed to the public and minimal staffing availability or teleworking caseworkers were unable to recertify the eligibility of ongoing SNAP households.

11. Caseload information, including percent, characteristics, and quality control error rate for affected portion:

Pennsylvania currently serves 956,172 SNAP households as of March 2020. For July 2020, there are currently 55,397 recertifications due and 44,163 SAR reporting forms due.

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

July 1, 2020 through July 31, 2020

13. Proposed quality control review procedures:

No special QC procedures are required for cases subject to the provisions of this waiver.

14. Signature and title of requesting official:

Tara Williams
Acting Deputy Secretary for Income Maintenance

Tara Williams

15. Date of request: 6/8/2020