



**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HUMAN SERVICES
OFFICE OF INCOME MAINTENANCE**

**P.O. Box 2675
Harrisburg, Pennsylvania 17105-8018**

**Lisa M. Watson
Deputy Secretary for
Office of Income Maintenance**

**Telephone: 717-783-3063
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**Eric Ratchford, Director
Supplemental Nutrition Assistance Program
USDA, Food and Nutrition Service
300 Corporate Boulevard
Robbinsville, New Jersey 08691-1598**

Dear Eric Ratchford:

The Department of Human Services (DHS) is requesting a waiver to permit the extension of certification periods and delay the action on Semiannual Reporting (SAR) and Reapplication forms statewide on an as needed basis for counties that are closed or that must take on additional work on behalf of closed counties due to concerns regarding the current Coronavirus (COVID-19). Governor Wolf has closed all offices under Governor's jurisdiction in Montgomery and Delaware counties which will severely hamper efforts to complete recertifications timely and process changes reported on the SAR forms during this period. Additional counties may also be closed soon, depending on how quickly COVID-19 continues to spread. As counties are closed, Pennsylvania will make every effort to ensure all processes continue as normal, which will require shifting work from closed counties to counties that remain open. This will result in counties having to maintain all of their normal workload as well as additional work received on behalf of the closed county(s).

Approval of this waiver request will aid both the affected County Assistance Office (CAO) and associated households. Allowing the proposed extension of SNAP certification periods and SAR time frames will support uninterrupted SNAP benefits to all households in impacted counties. Waiver approval will help alleviate confusion and minimize the disruption of the CAO staff's ability to serve SNAP households until such time as these CAOs can resume normal operation.

Eric Ratchford

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If you have any questions regarding this request, please contact Cathy Buhrig, Bureau of Policy Director at 717-787-4081 or via email at cbuhrig@pa.gov.

Sincerely,



Lisa M. Watson, J.D.

c: Cathy Buhrig
Thomas Smith, Jr
Brian Whorl

WAIVER REQUEST

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

2. Type of request:

Initial

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 as needed to SNAP households residing in either a closed county, such as Montgomery and Delaware counties, or a county that has seen an influx of work on behalf of a closed county. The certification period will be extended beyond their currently scheduled expiration date.

For all active SNAP households in a county that is closed or a county that has seen an influx of work on behalf of a closed county that have a SAR due, Pennsylvania is requesting a delay in action for those cases in which processing difficulties are encountered. Staff will continue to make every effort to process the SAR forms by the SAR due date.

Pennsylvania is requesting this waiver statewide to cover both counties that are not open for regular operations as well as counties that remain open and take on additional work for the closed counties. The counties that remain open will continue to have their own recertifications and SAR due dates but will also be asked to complete additional work for other counties leading to potentially significant increases in workload. By extending the certification period when this workload increases, it ensures that SNAP households in all counties continue to receive their benefits in a timely fashion. This waiver would be in place until all offices in Pennsylvania are able to resume processing at which time normal procedures would be reinstated.

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 health crisis.

10. Anticipated impact on households and State agency operations:

This waiver will prevent benefits from ending during this health crisis because offices are shut down and 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 949,787 SNAP households as of January 2020 and there are 26,758 SNAP households in Montgomery County, [need Delaware number] in Delaware County, the first counties to be closed.

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

March 13, 2020 until the COVID-19 health crisis has passed.

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:

Lisa M. Watson, J.D.
Deputy Secretary for Income Maintenance

A handwritten signature in black ink, appearing to read 'Lisa M. Watson', is written over a horizontal line.

15. Date of request:

3/14/2020