

## Rhode Island Certification Period Waiver Request

Type of request: Initial

Primary regulation citation: 7 CFR 273.10(f), 7 CFR 273.10(f)(5), 7CFR 273.12(a)(5)(iii)(B), 7 CFR 273.14(a)

State: Rhode Island

Region: Northeast

Regulatory requirements: 7 CFR 273. 10 (f) states households must be certified for a definite period of time, not to exceed 12 months unless the household is elderly/disabled or residing on a reservation, in which certification periods cannot exceed 24 months. Regulations at 7 CFR 273.10(f)(5) specifically indicate that SNAP certification periods may not be lengthened to exceed 12 months, unless the household contains an elderly/disabled member, in which certification periods may not exceed 24 months. 7 CFR 273.12(a)(5)(iii)(B) indicates that a periodic report form must be filed by the end of month 3 for households that are subject to a 12month certification period, or that a periodic report must be submitted by the end of month 12 for a 24-month certification period. 7 CFR 273.14(a) forbids households participating beyond the expiration of the certification period assigned.

Description of alternative procedures: This waiver will allow for a temporary, 3-month extension of certification months beyond 12 or 24 months for any households that are subject to a recertification. Additionally, any periodic report forms otherwise due within the 3-month waiver period would be waived. Certification periods will be automatically extended by 3 months to ensure that case closures do not occur because of a client's inability submit paperwork to recertify or meet periodic report requirements.

Periodic report forms will not be issued nor required to be sent back prior to this 3-month period.

Due to this 3-month extension, all cases impacted by the extended certification period will be required to complete a recertification by the end of month three as long as a recertification was due prior to or by the 3th month. All households who are still within their original certification period but would have otherwise been required to file a periodic report during the waiver period will be required to complete a periodic report by the end of month 3 and will maintain their previous certification period.

RI will maintain mandatory reporting requirements that take place in between certification periods. However, households will not be required to file a periodic report or recertification nor be subject to those additional reporting requirements during this 3 month waiver period.

Justification for request:

RI is experiencing unique and unprecedented circumstances with the onset of COVID-19. As of 3/20/20, in RI, 54 individuals have tested positive for COVID-19. Due to the rapid transmission of the virus, RI wants to ensure that individuals and families that are affected by COVID-19, through transmission or lifestyle impacts, are able to maintain their SNAP benefits without undue burden.

RI wants to ensure as few barriers as possible to food access during this period of uncertainty. RI had closed its lobbies to lessen the potential for exposure to the virus for both our customers and our staff.

By extending certification periods and waiving periodic report requirements for 3 months, RI will ensure that fewer individuals the spread of the virus and we will be able to maintain important nutritional assistance to our residents in anticipation of a reduced workforce due to quarantine and illness. Furthermore, by waiving the periodic report and extending certification periods, RI will prioritize new applications coming into the state agency. Many businesses and agencies are closing for an unexpected period to prevent the unnecessary spread of COVID-19. This may bring about a loss of wages that may require families to apply for SNAP when they have a limited or no other source of income. In order to ensure the timeliness of a projected influx in new applications during this time of temporary unemployment, RI is requesting to temporarily waive the periodic report and extend certification periods in order to direct attention to initial application processing.

Anticipated impact on households and State Agency operations: Rhode Island believes this will improve the public health response to the spread of COVID-19. This will also reduce the number of staff and SNAP recipients potentially exposed to COVID-19, minimizing its spread as well as a possible workforce shortage in the State Agency. As a response to unexpected unemployment, it will also allow newly eligible households to apply and be certified in a timely manner to ensure benefits are provided quickly and efficiently.

Caseload information, including percent of caseload and description of population expected to be affected by this waiver: For February 2020, the RI caseload included 146,600 people in 88,852 SNAP households. Throughout 2019, an average of 4,779 cases are due for recertification each month and an average of 4,402 interim reports are issued each month.

Time Period for which Waiver is needed: We are requesting approval as soon as possible and will implement the 3-month certification extension as soon as approval is received.

Proposed Quality Control Review Procedures: We are requesting that Quality Control be held harmless for the extension in the certification procedures and waiver of the periodic report, including reporting requirements at these two touchpoints. Quality Control will still assess for mandatory reporting requirements during this period. RI is requesting the state be held harmless for any untimely processing of changes reported as there may be a limited workforce and RI wants to focus on ensuring all newly eligible applicants receive priority and have access to food.

Signature and Title of Requesting Official:



Director, RI DHS

Date of Request: March 16, 2020