

Subject: RI Request for Waiver Extensions/Flexibilities for August
Date: Friday, July 24, 2020 1:09:45 PM

Good afternoon,

RI would like to request an the following waivers/adjustments for the month of August 2020:

1. Waive Fair Hearing Timeframes
2. Elimination of Face to Face Interview
3. Eliminate the interview at certification and recertification
4. Postpone expedited service interview

This request is based on the continuation of the state of emergency in Rhode Island until August 2, 2020 (see attached executive order) as well as the following operational challenges due to COVID-19:

1. Capacity of workforce/reduced staffing

RI DHS has continued to work at reduced staffing capacity due to the impact of COVID-19. On average, during the first week and a half of July, we had 291 employees present in the office, with 237 employees teleworking, and 165 out of the office not teleworking. This has us operating at a 76% staff working capacity (both in person and teleworking). Keeping these waivers in place through August will help DHS mitigate the impact of its reduced workforce on SNAP benefit processing and will help ensure that participants have timely access to their benefits.

2. Increased call volume

Although call volume has stabilized, we expect to see an increase in August when the \$600 unemployment insurance stimulus funding ends and these waivers will allow us to ensure timely access to benefits for those most in need.

3. Increased applications

Although application volume has stabilized, we anticipate a significant increase in application volume upon the discontinuance of the UI stimulus money at the end of July. We know there were 7,371 DHS benefit cases that had UI income including the \$600 boost. Though we don't have an impact breakdown of those DHS cases that were combined cases with Medicaid (2,042) we do know that 4,150 DHS cases were terminated and 1,091 DHS cases were denied due to receipt of the UI stimulus money. Though not all those cases were SNAP, with an integrated workforce and integrated eligibility system the impact to our staff will be significant. We predict that a large percentage of this population will reapply in August when the stimulus ends. Additionally, we are planning to proactively outreach to this population through multiple channels in order to encourage individuals to reapply for benefits. Rhode Island's high unemployment will also likely play a role in the volume of applications that will be submitted.

In relation to appeals, between March and July 17th, 741 appeals have been filed which require resources from both the DHS field staff and the EOHHS hearing office to address.

4. Extent of application backlog

118 non-expedited applications are pending over 30 days, with an average of 145 days, and a median of 135 days. We anticipate with the upcoming spike in applications due to the UI stimulus ending and high unemployment rate coupled with the reduced staff capacity and usual staffing reductions during the summer months, RI DHS will be at risk for an increased backlog and an increased need for continued waiver flexibilities into August.

5. Recertification processing timeliness

As FNS is aware, RI extended recertification dates for the months of March through June. The impact of that extension results in a significant increase in recertifications that need to be worked beginning in September, with November seeing as high as 106% increase in recertification volume. RI has worked on a plan to redistribute some of these recertifications over a longer period of August through December in order to better manage the increased volume (see attached spreadsheets with detail regarding the increased recertification numbers). Even with this redistribution of recertifications, eligibility workers will see a 56% increase in the amount of recertification forms needing to be processed starting in August.

6. Office Closures

In relation to the request to extend the suspension of face-to-face interviews, RI DHS's branch offices continue to be closed at this time and will continue to be closed through August, thus necessitating the continuation of these waiver requests.

In summary, the requested waivers are critical to our State's ability to efficiently and accurately determine eligibility for SNAP applicants. Last year, during the month of August, DHS received 3,725 applications for SNAP benefits. Nearly half of those applications were able to be processed while utilizing the waiver to postpone the interview for expedited applicants. This year, if a similar number of households applied in addition to those who lost benefits due to the \$600 UI boost our staff would struggle even if at full capacity. When coupled with the increase in recertifications due to the redistribution, 76% of staff working, and the loss of the postponed interview waiver, we are concerned that not only our timeliness will suffer but families seeking nutrition assistance will as well. Further, when timeliness is down, applicants call the call center to inquire about their applications which further slows down the ability to manage intakes.

Thank you for your consideration of these waiver extensions. Please reach out if there is anything additional you need in order to make your decision.

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