



HENRY McMASTER, GOVERNOR
MICHAEL LEACH, STATE DIRECTOR

July 2, 2020

Willie C. Taylor, Regional Administrator
USDA Food and Nutrition Service
Southeast Region
61 Forsyth Street SW, Suite 8T36
Atlanta, Georgia 30303

Dear Mr. Taylor:

Please find enclosed South Carolina's request to extend interview adjustments under the authority Section 2302(a)(2) as these adjustments are practicable under conditions in South Carolina due to the effects of the COVID-19 Public Health Emergency. As authorized by section 2302 of the Families First Coronavirus Response Act (P.L. 116-127), South Carolina is requesting to adjust SNAP regulation at 7 C.F.R. 273.2(a)(2), 273.2(e), and 273.14(b)(3) by not requiring a household to complete and interview prior to approval, provided all other mandatory verifications, including identity have been completed.

Since the onset of COVID-19, South Carolina has experienced a 15% increase in active SNAP enrollment, SNAP timeliness rate for June has fallen to 74%, and 34% of work received in June is still pending. In addition, in June, South Carolina has experienced a 211% increase in positive COVID-19 cases statewide and a 269% increase in confirmed cases amongst DSS staff since June 8, 2020. Over the last seven days, the agency has had to close nine county offices to employees in order to decontaminate the buildings and send exposed staff home to quarantine.

South Carolina understands the flexibilities for this extension are available for all applications and recertifications requiring an interview through July 31, 2020 and contingent upon South Carolina's compliance with conditions and evaluation requirements set forth by FNS. South Carolina anticipates this interview adjustment will affect approximately 35,000 households by way of increased client satisfaction and quicker access to program benefits.

Please contact Erika Anderson (Erika.Anderson@dss.sc.gov) or Dana Outlaw (Dana.Outlaw@dss.sc.gov) if additional information is needed.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Amber Gillum'.

Amber Gillum
Deputy State Director, Economic Services

Enclosures

STATE WAIVER REQUEST

Adjustment of Initial Certification and Recertification Interview Response (COVID-19)

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** Extension
3. **Regulatory citation:** 7 C.F.R. 273.2(a)(2), 273.2(e), and 273.14(b)(3)
4. **State:** South Carolina
5. **Region:** SERO
6. **Regulatory requirements:** Supplemental Nutrition Assistance Program (SNAP) regulations at 7 C.F.R. 273.2(a)(2) requires that the application process include an interview. Regulations at 7 C.F.R. 273.2(e) requires that the State agency interview households for eligibility before certifying. Regulations at 7 C.F.R. 273.14(b)(3) requires that State agencies interview households as part of the recertification process
7. **Proposed alternative procedures:** The State will not be required to interview a household at initial application or recertification, provided that the applicant's identity has been verified and all other mandatory verifications in 7 C.F.R. 273.2(f)(1) have been completed. The State will be required to contact the household if any information on the application is questionable and cannot be verified. The State will make every attempt to verify household circumstances through data matching and mailing or uploading verifications to the State system.
8. **Justification for request:** This action will allow SCDSS to take all necessary precautions for the safety of SCDSS staff, applicants and recipients of SNAP due to the unprecedented COVID-19 pandemic. The Center for Disease Control and Prevention "CDC" Coronavirus Disease 2019 (COVID-19), Prevention and Treatment (www.cdc.gov/coronavirus/2019) states the best way to prevent infection is to avoid being exposed to the virus that causes it.
9. **Caseload information, including percent of caseload and description of population expected to be affected by this waiver:** Since the onset of the COVID-19 pandemic, South Carolina experienced an 15% increase in active SNAP enrollment between March 2020 and June 2020. As of June 26, 2020, South Carolina's timeliness rate is at 76%, and 34% of work received in June is still pending processing as of June 29, 2020. Staffing shortages amongst eligibility workers continue to rise as reported coronavirus cases statewide have increased drastically over the last four weeks, making South Carolina one of the nation's top "hot spots" for COVID-19. SCDSS has experienced a 269% increase in confirmed cases of COVID 19 amongst our staff since June 8, 2020. Over the last seven days, the agency has had to close seven county offices to decontaminate the buildings and send exposed staff home to quarantine (six of these counties are part of the statewide interview center). Furthermore, due to the uncertainty of COVID-19 pandemic, South Carolina elected to suspend extension of certification periods in June 2020. Therefore, the expected number of annual recertifications due for July – August 2020 equates to approximately 35,000 cases needing a recertification interview on top of the higher than normal SNAP caseload and severe staff shortages.

- 10. Anticipated impact on households and State agency operations:** This action will allow SCDSS to promote social distancing for local office staff, SNAP applicants and recipients by offering protective options for submission of applications and verification. This action will also allow for safer facilitation of interviews for potential recipients to help prevent the exposure and/or threat of COVID-19.
- 11. Anticipated implementation date and time period for which waiver is needed (please indicate if the waiver approval is needed to make system adjustments):** South Carolina requests the implementation date of this waiver be July 1, 2020 (start date) and continue through August 31 (end date).
- 12. Proposed quality control review procedures:** No special quality control procedures will be required.
- 13. Name, title, and email of requesting official:**



Amber Gillum, Deputy State Director
Office of Economic Services
Amber.Gillum@dss.sc.gov

- 14. Date of request:** June 30, 2020
- 15. State agency staff contact:**
- Erika Anderson
Director, Division of Program Support, Office of Economic Services
Erika.Anderson@dss.sc.gov
- 16. Regional Office contact person (to be completed by FNS regional office):**