

STATE WAIVER REQUEST

- 1. Waiver Serial Number (if applicable):**
- 2. Type of request:** Extension (Amendment)
- 3. Statutory citation:** Food and Nutrition Act of 2008, as amended
- 4. Regulatory citation:** 7 CFR 273.2(a)(2), 7 CFR 273.2(e), and 7 CFR 273.14(b)(3)
- 5. State:** Tennessee
- 6. Region:** SERO
- 7. 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.

- 8. Description of 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.
- 9. Justification for request:**

The COVID-19 pandemic has significantly impacted the United States and has required every state agency to do its part to maintain access to vital supports like SNAP, while taking proactive measures to reduce further transmission of the virus. The State of Tennessee has sustained such provisions to reduce the proliferation of this virus amongst those in the State and remains under a State of Emergency through September 30, 2020.

The state has seen an exponential increase in the number of both SNAP and TANF applications over the course of this pandemic. And these numbers only tell a part of the story. Historically, July and August have been high volume months for SNAP applicants. The data below shows a comparison of applications received this year starting in March through August compared to last year at this same time:

2019 Applications		2020 Applications		Change
Month	Total	Month	Total	2019-2020
March	36,685	March	78,249	113.30%
April	41,401	April	96,590	133.30%
May	42,309	May	48,860	15.48%
June	42,829	June	56,211	31.25%
July	47,865	July	59,685	24.69%
August	25,157	August	37,753	50.07%
Total	236,246	Total	377,348	59.73%

This data shows a 59.73% increase in initial applications from 2019 to 2020. The Enhanced Unemployment benefits have now ended, we believe causing an increase in the number of applications we are receiving. Our department is currently under a hiring freeze. We also have 148 vacant positions with 68 vacant positions that have been abolished. TDHS has 143 Eligibility Counselors who are in training and have staggered caseloads and not able currently to have full caseloads to help with the increase. TDHS also has 164 individuals in Family Assistance that are on some type of special leave such as FMLA or leave without pay, again not able to help with the caseload. The continued and compounded loss of staff effects the workload of our department being able to process applications.

All Tennessee Department of Human Services' (TDHS) lobbies are only available for those requesting an appointment. Although staff have the capability to work remotely and have been doing so for the past five months, eliminating the need to make several phone attempts to customers increases productivity. Increased productivity that allows for customers to receive benefits sooner, and staff to complete eligibility for other programs such as TANF.

When the offices were trying to contact customers to complete telephone interviews before the waiver approval, they had a hard time reaching the customers because their phone numbers changed since the previous annual certification or they were out of minutes on their cell phones. When customers cannot be reached, they end up coming into our local offices concerned about whether they will get their benefits

In the end, the agency remains committed to our most vulnerable citizens. However, it is essential that we maintain congruent practices with CDC guidelines and reduce the stress already being felt by our staff. It is then of the utmost importance that the State not only continue to be able to issue benefits, but that we assure the safety and well-being of the people on the front lines assisting those of greatest need in our state. This alternative of continuing the waiving of the interview requirements ensures the State is able keep up with the high demand during this time of uncertainty in our country.

10. Anticipated impact on households and State agency operations:

This waiver will assure access to vital program supports are maintained so there is consistency for households. Furthermore, State agency operations remain streamlined by waiving the interview requirement for this limited time, aiding in the agency's response to the COVID-19 outbreak. Finally, these measures reduce the spread of COVID-19 reducing potential instances of exposure for both customer and staff. Thus, allowing the State to have sufficient staff working remotely to process applications and minimal staff in local offices to respond as needed. This will also allow us time to develop a more detailed transition plan that encompasses the use of technology and respond to the new normal post COVID-19.

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

The State is requesting a short-term waiver, from September 1, 2020 through to September 30, 2020 for the continuation of the state waiving interview requirements.

12. Proposed quality control review procedures:

There are no special quality control procedures needed in conjunction with this waiver.

13. State agency submitting waiver request and State contact person:

State Agency: State of Tennessee, Department of Human Services

State Contact: Lisa Cowell, SNAP Program Director

14. Signature and title of requesting official:

Lisa A. Cowell

Name: Lisa Cowell

Title: SNAP Program Director 4

Email for transmission of response: Lisa.Cowell@tn.gov

15. Date of request: August 28,2020

16. State agency staff contact (name/email/telephone):

Lisa Cowell, Lisa.Cowell@tn.gov, 615-741-5934

17. Regional office contact person (to be completed by FNS regional office):

SNAP COVID Adjustment Request and Transition Plan Summary

(The document should be no more than one page and is meant to be a high level summary for reference).

In order to receive approval, a State must demonstrate that the adjustments continue to be warranted given the current circumstances in the State and provide data to support extension.

State Agency and Region: Tennessee, SERO Region

What Adjustment(s) is the State Requesting (e.g. core verification and interview adjustment)

Adjustment Request for Initial Certification and Recertification Interviews Extension through September 30, 2020.

Demonstrated Need for Extension of the Adjustment (This should be based on operational data provided by the State, not a narrative. Data to support requests would be expected to include data on including lessened workforce capacity, increased recertifications, and/or increased case actions, among other supporting information.)

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Month	Total	Month	Total	
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April	41,401	April	96,590	133.30%
May	42,309	May	48,860	15.48%
June	42,829	June	56,211	31.25%
July	47,865	July	59,685	24.69%
August	35,813	August	54,272	51.54%
Total	246,902	Total	393,867	59.52%

This data shows a 59.73% increase in initial applications from 2019 to 2020. The Enhanced Unemployment benefits have now ended, we believe causing an increase in the number of applications we are receiving.

Our department is currently under a hiring freeze. We also have 148 vacant positions with 68 vacant positions that have been abolished. TDHS has 143 Eligibility Counselors who are in training and have staggered caseloads and not able currently to have full caseloads to help with the increase. TDHS also has 164 individuals in Family Assistance that are on some type of special leave such as FMLA or leave without pay, again not able to help with the caseload. The continued and compounded loss of staff effects the workload of our department being able to process applications.

How Does the State Plan to Transition to the New Normal *(The State should provide the region with a detailed plan that shows how and when the State will return to its “new normal” -- that is a steady operation that may in fact entail higher caseloads than experienced pre-Covid -- including a phased in approach.*

Currently under the waiver, we have used this time to streamline our Statewide Intake team for SNAP/TANF application processing. These staff can process 100% or 86,626 applications per month with the number of Eligibility Counselors currently assigned. But, compared to normal application processing, outside of this waiver where an interview is required, our Eligibility Counselors can only contact 60% of the customers the same day by telephone when their application is submitted. The remaining 40% of the customers are required to be scheduled a future date appointment due to no telephone contact, decreasing the number of new applications that can be assigned to and processed by an Eligibility Counselor each day.

If Tennessee can extend this waiver for the month of September 2020, this will allow us time to work through our transition plan having staff able to resume operations and handle caseload assignments. Our plan to transition forward consists of:

Case Maintenance Teams: Systems, Policy, and Field Services are collaborating on implementation of a Case Maintenance Team. This team will give staffing to the Statewide Intake Team and will reallocate workload assignments to those in the unit. They will handle work such as data matches, changes and simplified reporting forms.

Renewal team: In order to prepare for the increase in renewal applications, each District's Renewal Team will be restructured to equalize the number of assigned applications each month. By increasing the number of assigned renewal applications to 175 per Eligibility Counselor, this will allow for an additional 67 Eligibility Counselors to be added to the Initial applications team. Because our schedules are set two months in advance, staying under the waiver will allow us to have time to adjust to equally distribute the set renewal appointments so each Eligibility Counselor can process 175 appointments each month. In order to prepare for the increased renewal applications expected from the households who have been approved for SNAP and TANF as a result of the increased applications received due to the COVID-19 Pandemic the Renewal Team will transition to a Statewide process through collaborative efforts between Systems, Policy, and Field Services. By moving to statewide case and application processing, the ability to rotate staff from one team to another can be accomplished quickly and smoothly in order to meet the changes in staffing levels as well as the needs of the citizens of Tennessee.

Initial applications: Each Eligibility Counselor will be transitioned to accept 175 each month. We continue to shift our Eligibility Counselors between intake, renewal, and case maintenance to optimize our processing capabilities. Additionally, we continue to utilize overtime as it is available for staff.

The extension of the Initial and Recertification no interview waiver through September 2020 will allow for continued timely processing of applications, time for workload reassignments to occur and for statewide teams to be implemented.