



COMMONWEALTH of VIRGINIA

DEPARTMENT OF SOCIAL SERVICES

September 18, 2020

Eric Ratchford, Regional Director
Supplemental Nutrition Assistance Program
United States Department of Agriculture
Food and Nutrition Service
300 Corporate Boulevard
Robbinsville, New Jersey 08691-1598

Dear Mr. Ratchford:

I am writing to request a waiver of regulations that will allow Virginia to waive the certification interview for SNAP applicants in the City of Richmond Department of Social Services for the remainder of the month of September. This waiver will ensure that the City can meet the needs of their participants during what is a crisis situation for their agency and community at-large.

The waiver request is enclosed. Please contact Michele Thomas, SNAP Manager, at (804) 726-7866 or michele.thomas@dss.virginia.gov, if you need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Toni Blue Washington".

Toni Blue Washington, Director
Division of Benefit Programs

cc: Michele Thomas

Enclosure

State Waiver Request

1. **Waiver Serial Number:**
2. **Type of request:** Initial Request to Waive the Certification Interview
3. **Statutory citation:** The Food and Nutrition Act of 2008, Section 3(f) and Section 6(c)(1)(D)(i)
4. **Regulatory citation:** §7CFR 273.2(a)(2) and §7CFR 273.2(e)
5. **State:** Virginia
6. **Region:** MARO
7. **Regulatory requirements:** Supplemental Nutrition Assistance Program (SNAP) regulations at §7 CFR 273.2(a)(2) requires that the application process include an interview.

Regulations at §7 CFR 273.2(e) requires that the State agency interview households for eligibility before certifying.

8. **Description of alternative procedures:** Virginia will allow the City of Richmond Department of Social Services to not conduct an interview with a household at recertification, provided that the applicant's identity has been verified and all other mandatory verifications in §7 CFR. 273.2(f)(1) have been completed. The State will contact the household if any information on the application is questionable and/or 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:** On Friday March 13, 2020, President Trump declared a national state of emergency in response to COVID-19. Virginia is also under a state of emergency as declared by Governor Northam on Tuesday, March 12. As the adverse impacts of this pandemic continue, Virginia's immediate plan has been to ensure that families do not experience food insecurity as a result. In effort to ensure that households are able to maintain access to food during the COVID-19 pandemic, Virginia is requesting a waiver from the above statutes and regulations for the project area identified as the City of Richmond. Citizens, especially those at high risk, are being advised to avoid congregate areas to reduce exposure to the virus; the local department has adjusted operations to provide flexibility for staff and to adjust to staffing shortages; and business process and procedures are changing rapidly to meet the mounting demands for service.

Richmond City's vacancies for their Economic Support and Independence Division stands at 117 that include 60 vacancies for Benefit Programs Specialist. At this time, the agency only has approvals to hire 19 of the mentioned 117 vacant positions; the full number represents administrative support, program managers, supervisors and self-sufficiency staff. The process to onboard newly hired staff in an emergency capacity as well as through standard channels takes

between 45 and 60 days.

The City of Richmond has staff that work in intake and ongoing capacities. Currently, intake is staffed with 16 Benefit Programs Specialist (three are on leave); staffing for ongoing is 13 Benefit Programs Specialist (three are on leave). With the unprecedented numbers of eligibility actions needed along with the clear staffing shortages, there is a crisis in eligibility determinations. This waiver will ensure that there is no adverse harm done to the residents of Richmond City.

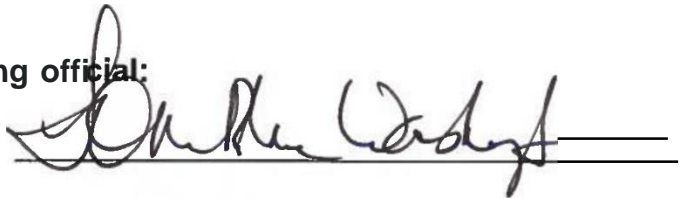
- 10. Anticipated impact on households and State agency operations:** Richmond City is the largest project area in Virginia with over 22,000 SNAP households. This represents over 41,000 people, many of represent vulnerable populations of the elderly, disabled, children, and homeless. Households will experience decreased food insecurity and the risk of exposure to COVID-19 is lessened by limiting interactions.

- 11. Caseload information, including percent, characteristics, and quality control error rate for affected portion (if applicable):** In August 2020, there were 22,528 SNAP households in the City of Richmond representing 41,204 individuals. Periodic reports for the agency average 1,800 per month.

In addition, the average application submission hovers around 1,100 per month with the added burden of 2,200 recertifications due for September 2020 the agency is overwhelmed. Recertifications due for the months of October are estimated at 2,300, November is projected at 2,200, and December has the highest at 2,600. The state reported Quality Control error rate through January 2020 is 5.22%.

- 12. Anticipated implementation date and time period for which waiver is needed:** Upon approval through September 30, 2020.
- 13. Proposed quality control review procedures:** There is no need for special Quality Control procedures.

- 14. Signature and title of requesting official:**



Toni Blue Washington
Director, Division of Benefit Programs
toni.washington@dss.virginia.gov

- 16. Date of request:** September 18, 2020
- 17. State agency staff contact (name/email/telephone):**
Michele Thomas
michele.thomas@dss.virginia.gov
804.726.7866
- 18. Regional office contact person (to be completed by FNS regional office):**

Kelly Boger
kelly.boger@fns.usda.gov
609.259.5009



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State Waiver Request

1. **Waiver Serial Number:**
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3. **Statutory citation:** The Food and Nutrition Act of 2008, Section 3(f) and Section 6(c)(1)(D)(i)
4. **Regulatory citation:** §7 CFR 273.2(a)(2) and §7 CFR 273.14(b)(3)2
5. **State:** Virginia
6. **Region:** MARO
7. **Regulatory requirements:** Supplemental Nutrition Assistance Program (SNAP) regulations at §7 CFR 273.2(a)(2) requires that the application process include an interview.

Regulations at §7 CFR 273.14(b)(3) requires that State agencies interview households as part of the recertification process

8. **Description of alternative procedures:** Virginia will allow the City of Richmond Department of Social Services to not conduct an interview with a household at recertification, provided that the applicant's identity has been verified and all other mandatory verifications in §7 CFR 273.2(f)(1) have been completed. The State will contact the household if any information on the application is questionable and/or 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.
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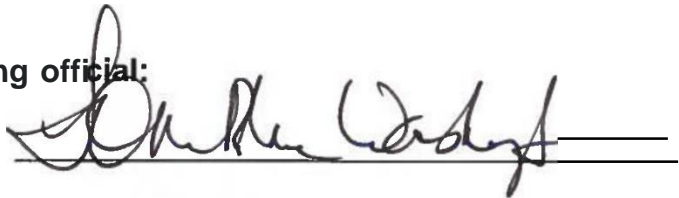
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