

June 26, 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 an extension of the waiver of regulations that will allow Virginia waive interviews at application and 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. This waiver will enable Virginia to meet the needs of our participants more efficiently during this State of Emergency.

Please contact Claudia Jackson, SNAP Manager, at (804) 726-7270 or claudia.jackson@dss.virginia.gov, if you need additional information.

Sincerely,

Toni Blue Washington

Toni Blue Washington, Director
Division of Benefit Programs

cc: Claudia Jackson

Enclosure

Waiver Request

1. **Waiver serial number:**
2. **Type of request:** Request for Extension of Waived Interview
3. **Primary regulation citation:** §7 C.F.R. 273.2(a)(2), 273.2(e), and 273.14(b)(3)2
4. **Secondary regulation citation:** Not applicable
5. **State:** Virginia
6. **Region:** Mid-Atlantic
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. **Proposed alternative procedures:** Virginia will not conduct an interview with a household at 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 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:** Virginia has been in a State of Emergency since March 12, 2020. Since that time, Virginia saw an unprecedented increase in SNAP applications. In the 8 weeks prior to March 15, 2020, SNAP applications averaged about 5,100 per week. During the 8 weeks following, SNAP applications averaged over 10,000 per week. Staff were able to manage the increased applications in a large part due to the interview waiver. The local departments in Virginia also shifted staff normally assigned to process recertifications to application processing to meet the increased demand for food assistance. This meant applicants received the benefits they so desperately needed in a timely manner.

Virginia operates under an enterprise approach in casework. Our eligibility system houses our benefit programs that include SNAP, Medical Assistance, TANF, and Energy Assistance as well as Child Care. The majority of Benefit Programs Specialists in the state are generic. When possible, programs align

efforts to ensure the most efficient service delivery for the customers we serve. During the COVID-19 Public Health Emergency, the suspension of the interview has contributed greatly to our ability to provide timely determinations to households. Medical Assistance does not require an interview and many of the customers applying for SNAP also sought assistance in other areas. The suspension of the interview also supported our efforts to ensure social distancing, office closures as well as the increase in telework. Because of the unexpected health emergency, many of our 120 local departments who are not able to provide essential tools such as cellular telephones and our internet services across the state are straining to meet the needs of our homebound staff. Collectively our programs agreed to extend certifications when possible and we continue to look for innovative and available waiver opportunities to assist with the increased workload.

With SNAP recertifications and periodic reports resuming in July and the local departments still operating with constrained resources, there is great concern that benefits will not be provided timely. This concern will become even more dramatic from September-December when the number of recertifications due each month will be doubled. The average number of recertifications is 30,000 per month but due to extending the certification periods from March-June, recertifications in September-December will average 60,000. As TANF and Medical Assistance also extended certification periods, staff will also have double the renewals for those programs.

Under these conditions, the interview waiver is needed to enable Virginia to maintain timely and adequate access to benefits for our participants.

10. **Anticipated impact on households and State agency operations:** This waiver will allow households to receive needed benefits timely and will make agency operations more efficient.
11. **Anticipated Implementation date:** July 1, 2020.
12. **Quality control procedures:** There are no changes to the Quality Control procedures for cases subject to the provisions of this waiver.
13. **Signature and title of requesting official:** *Toni Blue Washington*
Toni Blue Washington
Director
Division of Benefit Programs
14. **Date of request:** June 26, 2020
15. **State agency staff contact (name/email/telephone):**
Claudia Jackson

claudia.jackson@dss.virginia.gov
804.726.7346

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

Anita Diggs
Anita.Diggs@usda.gov
609.259.5153