



**STATE OF WASHINGTON**  
**DEPARTMENT OF SOCIAL AND HEALTH SERVICES**  
*COMMUNITY SERVICES DIVISION*  
*Economic Services Administration*  
*Post Office Box 45440 Olympia WA 98504-5440*

April 10, 2020

Jesus Mendoza, Jr. Administrator  
Supplemental Nutrition Assistance Program  
Food and Nutrition Service, Western Region  
United States Department of Agriculture  
90 Seventh Street, Suite 10-100  
San Francisco, California 94103

Dear Mr. Mendoza:

Washington state is requesting a waiver to extend certification periods for six months, for those SNAP cases with certification periods ending in April, May, and June 2020. We also request the suspension of interim reports for those cases receiving certification period extensions and for cases with an interim report due in April, May, or June.

The disruptions caused by COVID-19 are hardest on low-income Americans, including SNAP recipients. They run the risk losing SNAP benefits due to an inability complete interim reports or recertify, and their cases closing, because of fear of infection, closure of office lobbies, reduced access to call the SA call centers, their own illness, or caring for someone who is ill. Not all clients have the ability to complete their interim reports or recertification by phone or online. Maintaining access to nutritious food, and better health, is too important during a pandemic to risk so many lives.

In addition, our staff are enduring higher numbers of new applications from the large number of people who have lost their jobs. Suspending interim reports and extending certification periods will allow for more efficient office operations and better service to our clients.

We look forward to hearing from your office on this request in the very near future. If you have any questions, please feel free to contact Ezra Paskus at (360) 725-4311 or by email at [Ezra.Paskus@dshs.wa.gov](mailto:Ezra.Paskus@dshs.wa.gov)

Sincerely,

Babs Roberts, Director  
Community Services Division

Attachment

April 10, 2020

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cc: Charles Tobin, FNS  
Brian Solomon, FNS  
Shahdy Monemizadeh, FNS  
Elizabeth Albert, FNS

Shawn Hartline  
Alexis Marx  
Ezra Paskus  
Jennifer Ferguson, AL TSA

Sonja Dearmore  
Monica Medalen  
Deborah Doyle, DPI  
Marci Birdsall, DDA

## WAIVER REQUEST

### Extend Some Certification Periods by Six Months

1. **Waiver Request Number:**
2. **Type of Request:** New
3. **Primary Regulation Citation:** 7CFR 273.10(f)
4. **Secondary Regulation Citation:** 7CFR 273.14(a), 7CFR 273.12(a)(5)(iii)
5. **State:** Washington
6. **Region:** Western
7. **Regulatory Requirements:** Regulations at 7 CFR 273.10(f) states the certification period cannot exceed 12 months except to accommodate a household's transitional benefit period and for elderly/disabled households and tribal. Subparagraph (5), Lengthening certification periods, allows these periods to be lengthened as long as they do not exceed 24 months for elderly/disabled households and 12 months for all others.  
  
Regulations at 7CFR 273.14(a) state that no household may participate beyond the expiration of the assigned certification period without a determination of eligibility for a new period.  
  
Regulations at 7CFR 273.12(a)(5)(iii) require an interim periodic report in the sixth month for households assigned to simplified reporting, if the certification period exceeds six months.
8. **Proposed Alternative Procedures:** Washington State is requesting a waiver to automatically extend certification periods for 6 months of all households scheduled for recertification during April, May, and June 2020. We are also requesting that no interim periodic report be required of the simplified reporting households who were extended, and that all interim periodic reports due in April, May, and June 2020 be waived. (Cases in which all household members have died will close.) This will ensure no households lose participation in SNAP because of the COVID-19 pandemic.
9. **Justification for Request:** COVID-19 has closed businesses throughout the state, and has closed lobbies of government offices. Not all households are able to call in for phone recertifications or reapply online. Additionally, the SA is experiencing:

- reduced staffing levels of eligibility workers due to illness,
- technological restrictions limiting worker access to eligibility systems,
- more than double the number of applications received daily,
- increased call center hold times of up to an hour.

A six-month extension of all households that must complete a recertification during these three months, and waiving interim reports for those with extended certification periods and those with reports due during these three months, will ensure those who cannot call in, those who do not have access to the internet, and those who care for ill family members or are themselves ill, will receive uninterrupted benefits.

10. **Anticipated Impact on Households and State Agency Operations:** The average caseload (non-WASHCAP) for the past 12 months is 375,059. Approximately one-fourth, or 98,919, will need to be recertified within the next three months. The average number of WASHCAP cases during the same time period is 79,382. As those certification periods are three years, approximately one-twelfth, or 6,615, will need to be recertified within the next three months.

With the record-breaking numbers of people who have lost their jobs, the number of applications received by the SA have risen sharply, from an average of just over 1000 per day in the first week of March to more than 2200 per day four weeks later. No interim reports or recertifications for three months frees up our limited staff to handle the increased applications and provides much-needed time to identify and implement other solutions.

11. **Caseload Information, Including Percent, Characteristics, and Quality Control Error Rate for Affected Portion:** This would apply to all SNAP households who have a recertification due within the next three months. The state-only accuracy rate for FFY 2019 was 95.37 percent.

12. **Anticipated Implementation Date and Time Period for Which Waiver is Needed:** Implementation will occur upon receipt and as soon as the certification periods can be extended. Affected households will receive adequate notice of the change. We request the waiver be approved for six months.

13. **Proposed Quality Control Review Procedures:** We request that these cases be included in the regular sample and reviewed in accordance with FNS Handbook 310, and the State to be held harmless for any errors occurring because of changes that would have been reported during the interim report or recertification. Clients will still be required to report changes under simplified reporting rules—the hold harmless provision recognizes the extreme circumstances we are in and acknowledges that people may not be able to report changes in a timely manner. We expect to review the data from the hold

harmless period to better inform our program actions for future pandemics and disasters.

14. **Signature and Title of Requesting Official:**



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Babs Roberts, Director  
Community Services Division

15. **Date of Request:** April 10, 2020