

Waiver Request – Extended certification period and periodic reporting requirements

Type of request: Initial

Primary regulation citation: 7 CFR 273.10(f), 7 CFR 273.10(f)(5), 7 CFR 273.12(a)(5)(iii)(B), 7 CFR 273.14(a)

State: West Virginia

Region: Mid-Atlantic

Regulatory requirements: 7 CFR.10(f) states households must be certified for a definitive period, not to exceed 12 months unless the household is elderly/disabled or residing on a reservation, in which certification periods cannot exceed 24 months. Regulation 7 CFR 273.10(f)(5) specifically indicate that SNAP certification periods may not be lengthened to exceed 12 months, unless the household contains an elderly/disabled member, in which certification periods may not exceed 24 months. 7 CFR 273.12(a)(5)(iii)(B) indicates that a periodic report form must be submitted by the end of month 3 for households that are subject to a 12-month certification period, or that a periodic report form must be submitted by the end of month 12 for a 24-month certification period. 7 CFR 273.14(a) forbids households participating beyond the expiration of the certification period assigned.

Description of alternative procedures: This waiver will allow for a temporary, 3-month extension of certification months beyond 12 or 24 months for any households that are subject to recertification. Additionally, any periodic report forms (PRC-2) scheduled to be completed during the 3-month waiver period would be temporarily waived. The proposed waiver period would begin effective April 01, 2020 and will end June 30, 2020. Certification periods will be automatically extended by 3 months to ensure that SNAP closures do not occur because of a recipients' inability to travel to a local WV DHHR office or submit paperwork to recertify in order to meet periodic report requirements. Periodic report forms (PRC-2) will not be issued or required to be sent back prior to this 3-month period.

Due to this 3-month extension, all cases impacted by the extended certification period will be required to recertify by the end of month 3, if a recertification was due prior to or by the 3rd month. All SNAP households who are still within their original certification period but would have been required to file a periodic report during the 3-month waiver period must complete a periodic report by the end of month 3. These individuals will maintain their previous certification periods.

WV will continue to enforce mandatory reporting requirements as required by limited reporting during the 3-month waiver period. However, households will not be required to file a periodic report or recertification, nor be subject to those additional reporting requirements during this 3-month waiver period.

Justification for request: As of 03/23/20, West Virginia had 16 confirmed positive case of COVID-19, however WV has one of the oldest populations of elderly individuals ages 60+ and

one of the largest populations for disabled individuals under the age of 60. These touchpoints alone put WV near the top of states who are at-risk for the spread of COVID-19. West Virginia is a small state with a population of just 1.8 million, however approximately 16.5% of our state is currently receiving SNAP benefits. WV is uniquely situated geographically, with many of our rural counties lacking transportation and the ability to access necessary resources. Our main priority is access to SNAP for all eligible West Virginians without undue burden, especially in critical times of need. WV wants to ensure as few barriers to the benefit as possible during this period of uncertainty. By extending certification periods and temporarily waiving periodic reporting, WV will do our part to help slow the spread of COVID-19.

Anticipated impact on households and State Agency operations: The state of West Virginia believes this waiver request will improve our public health response to the spread of COVID-19. This will also reduce the amount of staff and SNAP recipients potentially exposed to COVID-19, minimizing the spread of the virus and maintaining a healthy State Agency.

Caseload information, including percent of caseload and description of population expected to be affected by this waiver: During the month of February 2020, WV had a total of 160,487 individual SNAP cases, with 303,291 individual SNAP recipients. In an average month it is estimated that approximately 10,000 SNAP households are due for recertification.

Time period for which this waiver is needed: The state of West Virginia is requesting approval as soon as possible and will implement the 3-month certification extension from April 01, 2020 – June 30, 2020.

Proposed Quality Control Review Procedures: We are requesting that Quality Control be held harmless for the extension in certification procedures and waiver of the period reporting, including reporting requirements of these two touchpoints. Quality Control will still assess for mandatory reporting requirements during this period, as required by limited reporting.

Signature and Title of Requesting Official:



Linda Watts, Commissioner

West Virginia Bureau of Children and Families