

WAIVER REQUEST

1. **Waiver serial number:**
2. **Type of request:** Periodic Report Flexibility for Non-Extended Recertification Cases
3. **Primary regulation citation:** §273.14 (b)
4. **State:** West Virginia
5. **Region:** MARO
6. **Regulatory requirements:** Under current regulations, the State agency must conduct an interview with a member of the household or its authorized representative at least once every 12 months for households certified for 12 months or less as part of the recertification process. In addition, States must develop and use an application form for the redetermination process.
7. **Proposed Alternative procedures:** The State of West Virginia wishes to utilize the use the Periodic Report Flexibility for Non-Extended Recertification Cases. Periodic report procedures to establish a new certification period only for households due for recertification who did not have their certification periods extended under previous adjustments. The periodic report form in lieu of the application for recertification and consistent with periodic report procedures. Consistent with current periodic report procedures, West Virginia will follow up with a household's for circumstances that are unclear or questionable, but not conduct a full interview.

For those households eligible to be subject to the waiver and will not have an interview completed, West Virginia will opt to place these households on a 6-month certification period. This means that households who complete the contact forms under this waiver will be placed on a six-month certification period.

For those household who are not eligible for the waiver—those households on 24-month certification periods and households whose certification periods were extended from the months of March, April, and May 2020, West Virginia will complete its normal redetermination process, including the interview.

On January 1, 2021, the West Virginia DHHR will be back to normal in its certification cycles.

8. Justification for request:

Due to the impact of COVID-19, redeterminations were paused and certification periods extended from April 2020, May 2020, and June 2020 to October 2020, November 2020, and December 2020, respectively. These numbers are presented in the chart below and represent a greater than 50 percent increase in anticipated recertification applications for the months of October, November, and December compared to the same months last year.

Month	Total Number of Scheduled Redetermination	Percentage Change From 2019 to 2020
October 2019	8,533	N/A
October 2020	17,472	+105%
November 2019	7,699	N/A
November 2020	17,383	+126%
December 2019	7,592	N/A
December 2020	22,005	+190%

At the time of this waiver request, both (1) a public health emergency declaration by the Secretary of Health and Human Services under section 319 of the Public Health Service Act and (2) a State emergency order are in place.

9. Anticipation impact in households and State agency: The anticipated impact is an increase in administrative timeliness, a decrease in client churn, and improved customer service.

10. Anticipated implementation date: 09/01/2020

11. Proposed Quality Control review procedures: There are no special procedures associated with this waiver.

12. Signature and title of requesting official:

Linda Watts

Linda Watts, Commissioner
Bureau for Children and Families
West Virginia Department of Health and Human Resources

13. Date of Request: August 21, 2020

SNAP COVID Adjustment Request and Transition Plan Summary

State Agency and Region: West Virginia; MARO

What Adjustment(s) is the State Requesting:

West Virginia is requesting the Periodic Report Flexibility for Non-Extended Recertification Cases adjustment. This would be applied to households who (1) are non-extended recertification cases and (2) are currently on a 12-month certification period, rather than a 24-month certification period. For those households eligible to be subject to the waiver and will not have an interview completed, West Virginia will opt to place these households on a 6-month certification period. This means that households who complete the contact forms under this waiver will be placed on a six-month certification period.

Demonstrated Need for Extension of the Adjustment

Increased recertifications is the demonstrated need for the extension of the adjustment. This meets the criteria of:

50 percent increase in anticipated recertification applications for the month(s) requested, compared to the same month(s) last year

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How Does the State Plan to Transition to the New Normal

West Virginia will return to its “new normal” effective January 1, 2021. By placing redeterminations completed with a contact form and without an interview on a six month certification period, West Virginia will balance out its workload over the course of the calendar year. West Virginia will utilize a combination of telephone interviews, its shared document imaging database (OnBase), and its statewide combined eligibility system (eRAPIDS) to serve its citizens. West Virginia has the capacity to serve all its citizens over the course of a year, but not in individual months when redetermination cycles are displaced. By utilizing non-interview reporting forms for some of its redeterminations in the months of October, November, and December, West Virginia can meet the needs of its citizens. By placing these households on a six-month certification period, the annual redetermination workload will be more evenly distributed, with the current empty months of April, May, and June 2021 being given a proportional share of the number of annual certification end dates.