



March 19, 2020

VIA EMAIL

Mr. Dwight Crudup
Regional Director
United States Department of Agriculture
Food and Nutrition Service
1100 Commerce Street, Room 522
Dallas, Texas 75242

Dear Mr. Crudup:

On March 13, 2020 President Trump declared a national emergency due to the novel coronavirus (COVID-19) outbreak. Additionally, Texas' Governor, Greg Abbott, also issued a statewide declaration of disaster on March 13, 2020 due to impacts of COVID-19.

Federal and state guidance have directed agencies to take additional steps to prepare for, respond to, and mitigate the spread of COVID-19 for purposes of protecting the health and welfare of all individuals. This pandemic requires social distancing including schools, businesses and workplaces being shut down.

In order to provide assistance to SNAP recipients, the Texas Health and Human Services Commission is requesting your consideration of the attached waiver to extend SNAP recertifications for three months and waive the periodic reporting requirements. Extending the certification periods as proposed via an automated process would ensure benefits will continue to be provided to households during this pandemic, reduce workload, and would be a more effective and efficient administration of the SNAP program.

Your prompt attention to our request is appreciated. If you have questions or require additional information, Hilary Davis, Texas Works Policy Manager for Program Policy, Access and Eligibility Services serves as the lead staff on this matter and may be reached by telephone at (512) 206-5556 or by email at Hilary.Davis@hhs.state.tx.us.

Sincerely,

Mr. Dwight Crudup

March 19, 2020

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A handwritten signature in black ink, appearing to read 'Wayne Salter', with a long horizontal flourish extending to the right.

Wayne Salter

Deputy Executive Commissioner

Access and Eligibility Services

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** N/A
2. **Type of request:** Initial
3. **Regulatory citation:** 7 CFR 273.12(a)(5)(iii)
4. **State:** Texas
5. **Region:** Southwest Region (SWRO)
6. **Regulatory requirements:**
 - 7 CFR 273.10(f)(3)(i) requires a minimum certification period of six months for most households.
 - 7 CFR 273.10(f)(5) allows states to extend established certification periods up to a maximum of 24 months for households that consist of all elderly or disabled individuals and up to 12 months for all other households.
 - 7 CFR 273.12(a)(5)(iii) requires an interim periodic report in between the fourth and sixth month for households assigned to simplified reporting (SR), if the certification period exceeds six months, and once a year for households that consist of all elderly and disabled members with certification periods lasting between 13 and 24 months.
7. **Proposed alternative procedures:** The state requests to waive the periodic reporting requirement for SR households with certification periods set to expire in April 2020, May 2020 and June 2020, in order to extend the certification period for three months and waive the periodic reporting requirement during the extension for all Texas counties (statewide). The state also requests to waive the requirement to have at least one contact with non-SR households that consist of all elderly and disabled members if the households are certified for periods lasting between 13 and 24 months for households with 12-month certification periods set to expire in April 2020, May 2020 and June 2020. This waiver will allow the state agency to extend these households' certification periods by three months without triggering the requirement to implement additional reporting requirements.
8. **Justification for request:** This waiver is requested under provisions of 7 CFR 272.3(c)(1)(i) which allows the Food and Nutrition Service to authorize waivers due to extraordinary temporary situations, and 7 CFR 272.3(c)(1)(ii) which allows approval of waivers which result in a more effective and efficient administration of the SNAP program.

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also issued a statewide declaration of disaster on March 13, 2020 due to impacts of COVID-19. Federal and state guidance have directed agencies to take additional steps to prepare for, respond to, and mitigate the spread of COVID-19 for purposes of protecting the health and welfare of all individuals. This pandemic requires social distancing including schools, businesses and workplaces being shut down. Extending the certification periods as proposed via an automated process would ensure benefits will continue to be provided to households during this pandemic and would be a more effective and efficient administration of the SNAP program.

Additionally, extending the certification period for an additional three months to households whose benefits are scheduled to end in April, May and June 2020 will allow them to continue to participate and will reduce recertification-related workload for the next three months providing the State flexibility in the administration of the program to mitigate future workload concerns that may arise as impacts from the pandemic progress and evolve.

9. **Caseload information, including percent of caseload and description of population expected to be affected by this waiver:** The estimated number of cases that would be extended under this proposal is approximately 182,000 cases per month for April 2020, May 2020 and June 2020. The current total statewide caseload as of February 2020 is 1,427,440.
10. **Anticipated impact on households and State agency operations:** This waiver will ensure current SNAP households continue to receive benefits and allow the State to more effectively use staff to timely process the influx of new applications and reviews resulting from federal and state pandemic guidance. Current SNAP recipients and new applicants will receive benefits timely and experience increased customer service and access to SNAP benefits.
11. **Anticipated implementation date and time period for which waiver is needed (please indicate if the waiver approval is needed to make system adjustments):** The waiver is requested for immediate implementation. Waiver approval is needed to make system adjustments for SNAP recertifications scheduled to end in April, May and June 2020.
12. **Proposed quality control review procedures:** No special QC procedures are required for cases subject to the provisions of this waiver
13. **Name, title, and email of requesting official:**
Name: Wayne Salter

Title: Deputy Executive Commissioner, Access and Eligibility Services

Email: Wayne.Salter@hhsc.state.tx.us
14. **Date of request:** March 19, 2020

15. State agency staff contact:

Name: Hilary Davis

Title: Texas Works Policy Manager, Program Policy, Access and Eligibility Services

Email: Hilary.Davis@hpsc.state.tx.us

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

