# SUMMARY OF COVID-19 SNAP WAIVERS, FLEXIBILITIES, OPTIONS & MEMOS



Pandemic response legislation made significant changes to SNAP administration and benefits to quickly provide food to those in need. This resource briefly describes SNAP waivers and guidance memoranda by USDA-FNS in response to the coronavirus. The waivers are organized by:

- Recipient Focused: waivers that increase benefit amount or broaden eligibility requirements
- Administrative Flexibilities: waivers that provide SNAP agency flexibility in program administration

More detailed guidance on SNAP COVID-19 Waivers and the Thrifty Food Plan can be found at: <a href="http://bestpractices.nokidhungry.org/resource/thrifty-food-plan-and-pandemic-changes-snap-guide-advocates">http://bestpractices.nokidhungry.org/resource/thrifty-food-plan-and-pandemic-changes-snap-guide-advocates</a>.

#### This was last updated on 9/6/2021.

See <u>USDA FNS website</u> for all SNAP COVID-19 waivers and guidance memoranda. Additionally, USDA website breaks this information down by state.

State agencies are eligible to use all nationwide waivers without application, but they must still elect to be subject to the waiver by notifying their USDA Regional Office. Please contact your state SNAP agency for more information about these and other state-requested waivers. Due to the number of extensions, tables provide lists waivers and memoranda in order of release date with links to extensions and modifications. The table links to the USDA landing page for the waiver.

#### **SNAP RECIPIENT COVID-19 RESPONSE WAIVERS**

Emergency Allotments (EA): Emergency Allotments provide an additional allotment to all SNAP households. The Families First Coronavirus Response Act authorized emergency allotments to SNAP households to help address temporary food needs during the pandemic. Originally, EAs were only provided to SNAP Households receiving less than the maximum SNAP allotment. In April 2021, Emergency Allotments became available to all SNAP recipients. States must submit a request, and FNS is approving states to issue emergency supplements to SNAP households monthly. EAs requires both a federal and state public health emergency. States make request that EAs continue for one month following the lifting of the state public health emergency.

15% increase in SNAP allotments: The Consolidated Appropriations Act, 2021, signed on December 27, 2020, increased SNAP benefits by raising maximum allotments to 115 percent of the June 2020 value of the Thrifty Food Plan (TFP). The American Rescue Plan Act extended the 15% increase until September 30, 2021.

<u>College Student Eligibility</u>: The Consolidated Appropriations Act 2021, <u>temporarily expands SNAP</u> eligibility to allow students who either:

- Are eligible to participate in State or Federally financed work study during the regular academic year, as determined by the institution of higher education, or
- Have an expected family contribution (EFC) of 0 in the current academic year. From January 16, 2021, students who meet one of the two criteria outlined above may receive SNAP if they meet all other financial and non-financial SNAP eligibility criteria. The new, temporary exemptions will be in effect until 30 days after the federal COVID-19 public health emergency is lifted.

<u>SNAP Online Purchasing</u>: FNS rapidly expanded SNAP online purchasing to support social distancing covering 90% of SNAP households. The SNAP online purchasing pilot started prior to the pandemic but expanded quickly to allow SNAP recipients and retailers to better abide by local public health orders and allow online grocery ordering for approved retailers.

Able-bodied Adults without Dependents (ABAWDs) Time Limit Suspension: FNS issued guidance to states suspending the time limit for ABAWD work requirements during the national emergency. The Families First Coronavirus Response Act suspended the time limit for ABAWDs, except in certain circumstances. If a State offers an ABAWD a slot in a work or workfare program, including a SNAP Employment and Training (E&T) program, the individual is still subject to the time-limit. In addition, the State still needs to determine whether the ABAWD who was offered a slot in the work or workfare program had good cause for failure to comply. The suspension of the ABAWD time limit continues for one month following the lifting of the federal public health emergency.

#### **SNAP ADMINISTRATIVE COVID-19 RESPONSE WAIVERS**

Application Processing: FNS provided flexibilities to support application processing by state agencies given pandemic conditions. FNS began issuing adjustments of application processing procedures in March 2020, using authority granted by Families First Coronavirus Response Act (FFCRA). Adjustments approved under FFCRA have typically been approved on a month-by-month basis. FNS provided state agencies guidance on SNAP flexibilities in response to COVID-19, including authorities as provided through FFCRA.

- Adjustments to Interview Requirements: SNAP regulations (7 CFR 273.2) require an interview prior
  to benefit issuance. During the COVID-19 pandemic, FNS allowed states to adjust interview
  requirements for SNAP applicants and recertifications. FNS allowed state agencies to adjust:
  - By not requiring a household to complete an interview prior to approval, provided the applicant's identity has been verified and all other mandatory verifications completed. 7 C.F.R. 273.2(a)(2), 273.2(e), and 273.14(b)(3)
  - By not offering a face-to-face interview or granting a request for a face-to-face interview to any household at application or recertification. 7 C.F.R. 273.2(e)(2)(i)
  - By not requiring households that are eligible for expedited service to complete an interview prior to approval, provided that an applicant's identity has been identified and an attempt has been made to contact the household for an interview. <a href="March 26">March 26</a>, 2020 / Extended in the Continuing Appropriations Act 2021 through <a href="June 30">June 30</a>, 2021 / Potential extension: <a href="Extension of SNAP COVID-19">Extension of SNAP COVID-19</a> Administrative Flexibilities <a href="May 2021">May 2021</a> and Beyond.
- Core Verification and Interview Adjustment: FNS permitted state agencies to conduct streamlined interviews for at least 50% of non-elderly or disabled households. All initial applicants will continue to be interviewed. State agencies may also request to use the periodic report in lieu of an application for recertification to establish a new certification period for households. SNAP simplified reporting households certified for four months, or more are subject to periodic reporting requirements. Waiver of 7 CFR 273.14(b)(2) and (3) March 26, 2020 / Extended in the Continuing Appropriations Act 2021 through June 30, 2021 / Potential extension: Extension of SNAP COVID-19 Administrative Flexibilities May 2021 and Beyond
- <u>Extend Certification Periods</u>; <u>Waive Periodic Reports</u>: Under authority provided in the Families
  First Coronavirus Response Act, FNS allows states to extend certification periods and temporarily
  waive periodic report form submissions for households whose certification periods expire within a set
  timeframe, waiving <u>7 CFR 273.10(f)(5)</u>. <u>March 26, 2020</u> / Extended in the Continuing Appropriations
  Act 2021 through <u>June 30, 2021</u> / Potential extension: <u>Extension of SNAP COVID-19 Administrative</u>
  Flexibilities May 2021 and Beyond
- <u>Telephonic Signature</u>: FNS allowed states to document in writing in the case file that a client verbally attested to the information provided on the application, instead of requiring an audio recording of the verbal attestation to constitute a valid telephonic signature. <u>March 26, 2020</u> / Extended in the Continuing Appropriations Act 2021 through <u>June 30, 2021</u> / Potential extension: <u>Extension of SNAP COVID-19 Administrative Flexibilities May 2021 and Beyond</u>

Other Application Processing Waivers: FNS will allow states to suspend the use of the Income and Eligibility Verification System (IEVS) for ongoing households statewide and in-person collection of applications and documents. (CA, IN) FNS required States to verify income through other data sources and databases and act on all other mandatory matches, including prisoner and death matches. FNS will allow approved states to suspend in-person collection of applications and verification documents from households. (OH, MS)
 Many states requested additional flexibilities and FNS has denied certain other application-processing

waivers. Other waiver requests by states that we denied by FNS: SNAP - Other Waivers | USDA-FNS

<u>Periodic Report Flexibility for Non-Extended Recertification Cases</u>: FNS will permit state agencies
to use periodic report procedures for household due to recertify to establish a new certification period.
This may only be applied to households that have not had their certification periods previously
extended through other adjustments. <u>Reporting</u>: Adjustments related to participant reporting
requirements or timelines.

Claims: SNAP regulations ( 7 CFR 273.18(d)) require State agencies to establish a claim before the last day of the quarter following the quarter in which the overpayment or trafficking incident was discovered and ensure that no less than 90 percent of all claim referrals are either established or disposed of according to this time frame. FNS will allow state agencies to suspend SNAP regulations at 7 CFR 273.18(d) by allowing flexibility in the time frame for establishing or disposing of new claims. States are also permitted to suspend SNAP regulations at 7 CFR 273.18(e)(1) and (e)(5) by not requiring collection of active recoupment of SNAP overpayments, delaying collection on newly established overpayments, and not considering any payments delayed due to this suspension to be delinquent. FNS issued a blanket approval for this flexibility at the start of the COVID-19 pandemic from March 2020 through May 2020. Potential Extension: Extension of SNAP COVID-19 Administrative Flexibilities May 2021 and Beyond

<u>Fair Hearings</u>: FNS provided state agencies flexibility to extend the fair hearings process up to 120 days from receipt of the request for fair hearings that were already in process or for which requests are received from March 1 through May 31, 2020. Also, the time frame for sending notices confirming oral withdrawal requests may be extended up to 30 days from receipt of the request for such requests received during this same timeframe to April 30, 2020. Potential Extension: <u>Extension of SNAP COVID-19 Administrative Flexibilities May 2021 and Beyond</u>

<u>Flexibility for States With Increasing Workloads:</u> In February 2020, FNS issued the <u>Revised Guidance for Use of Vendor/Private Staff</u> in Call Centers.

<u>Quality Control</u>: SNAP Quality Control (QC) is a process for reviewing SNAP cases. Federal law requires random SNAP cases to be reviewed every month in all states. SNAP QC looks for two things: 1) That a household is receiving the right amount of SNAP benefits; and 2) That the SNAP assistance office is processing cases correctly. Several flexibilities were provided during the public health emergency in SNAP quality control.

- QC Case Review Extension: SNAP regulations ( 7 CDFR 275.21(b)(4) ) require state agencies to conduct a review, dispose of and report all findings of cases from the sample month within 115 days or provide FNS will an explanation for any delay. Due to the COVID-19 pandemic, FNS provided blanket approval for an additional 45 days.
- Offered to All States 3/19/2020 | Offered for All States for June Cases 9/02/2020
- QC Interviews: SNAP regulations ( 7 CFR 275.12(c)(1) ) require State agencies to conduct personal
  face-to-face interviews for QC active case reviews at the participant's home, at an appropriate State
  agency certification office, or at a mutually agreed upon alternative location. Due to the COVID-19
  pandemic, FNS provided state administrative agencies with flexibility on how/if these interviews were
  conducted.
  - Suspend Face to Face QC Interviews: Flexibility to Allow Telephone Interviews In lieu of Face-to-Face Interviews for March. April and May 2020 Quality Control Case Reviews March 13, 2020

- Extension: Suspend Face to Face QC Interviews: Flexibility to allow State agencies to suspend requirements at 7 CFR 275.12(c)(1) to conduct face-to-face interviews for QC active reviews through <u>September 30, 2020</u>
- Extension: Suspend Face to Face QC Interviews: Flexibility to allow State agencies to suspend requirements to conduct face-to-face interviews for QC active case reviews through December 31, 2020.
   Offered to all States 8/25/2020
- Extension and modification: Suspend Face to Face QC interviews: From July 1, 2021, through December 31, 2021, FNS will allow State agencies to suspend requirements to conduct face-to-face interviews for QC active reviews. FNS is approving States to conduct telephone interviews in lieu of face-to-face interviews for all QC interviews conducted through December 31, 2021, regardless of the sample month. Offered to all States: April 30, 2021
- QC Sanctions/Sampling/Etc.: Households are required to cooperate with the QC review process.
  Refusal to cooperate will result in termination of the household's eligibility. For a determination of a
  refusal to be made the household must clearly demonstrate that it will not take actions that are required
  to complete the QC review process. This waiver provides flexibility during the pandemic when
  households are unable to cooperate with the QC process.
  - Section 4603(a)(2) of the Continuing Appropriations Act, 2021 and Other Extensions Act (PL 116-159), as amended by the Consolidated Appropriations Act, 2021 (PL 116-260) allowed state agencies to suspend QC sampling and reviews from June 1, 2020, through June 30, 2021. Beginning with the July 2021, sample month, state agencies are expected to resume regular SNAP QC operations. Offered to all States: April 30, 2021

**Suspend Issuance of Excessive Card Replacement Notices:** FNS will allow states to temporarily suspend issuance of replacement card notices due to office closures and mandated remote work. At the conclusion of this waiver period, the state agency will send the delayed notices to affected households. (DE, WV)

**Extend Administrative Disqualification Hearings (ADH) Timeframes:** This waiver allows state agencies to extend the timeframe for the full ADH process to a maximum of 180 days from the time of the hearing notification, and the potential postponement period up to 60 days. (NC)

**Extend SSN Good Cause Period:** FNS will allow the state agency to extend the timeframe for an individual to participate in SNAP after having established good cause for failure to provide a Social Security Number (SSN) for up to an additional 3 months, to address COVID-19-related closures of Social Security Administration offices. (IL. WA)

Revise Authorized Representative Requirements: FNS will permit states to allow certain community partners and advocates to sign an application as an authorized representative of a household based on the household's verbal assent. (IL, DE)

#### **SNAP FUNDING FOR STATES AND TERRITORIES:**

Additional Funding for Block Grants: FNS is providing up to \$300 million in additional funding to nutrition assistance program block grants in Puerto Rico, the Northern Marianas, and American Samoa.

Additional Funding for Online SNAP Services: The Continuing Appropriations Act 2021 provided \$5 million for additional support to conduct end-to-end testing, and technical assistance to educate retailers on the process and technical requirements, for the SNAP online purchasing program; Cooperative agreements or grants, provided on a competitive basis, to not more than 5 eligible entities, to build out functionality and provide assistance to enable direct marketing farmers and farmers' markets to accept SNAP benefits through online transactions; and technological developments related to security and privacy for mobile payment technology to support mobile payment demonstration projects. The American Rescue Plan Act provides up to \$25 million,

through Fiscal Year 2026, for Technological improvements for the SNAP online purchasing program; Electronic benefit transfer modernization to support mobile payment demonstration projects and the use of mobile technologies; and technical assistance to educate retailers on the process and technical requirements for the acceptance of SNAP benefits online, mobile payments and electronic benefit transfer modernization initiatives

<u>Additional Funding for State Administrative SNAP funds</u>: FNS is providing with an additional \$1.135 billion in administrative resources for states over three years, without requiring states to match those funds

## TABLE OF SNAP COVID-19 RESPONSE WAIVERS/FLEXIBILITIES/STATE OPTIONS

Waiver / Flexibility/ State Option Name	SNAP Population Covered	Release Date	End Date	What It Does	Notes
Emergency Allotments	ALL	April 1, 2021	Requires State and Federal Public Health Emergency States may request EA approval for one additional issuance month after expiration of state public health emergency	All SNAP Households receive a monthly emergency SNAP allotment of at least \$95. SNAP Households receiving less than the maximum benefit allotment will receive the maximum allotment	Replaces: EmergencyAllotmentsGuidance.docx (azureedge.net). Originally implemented for only those households receiving less than the maximum amount. USDA updated based upon Executive Order on Economic Relief Related to the COVID-19 Pandemic   The White House  State-by-state approval: SNAP COVID-19 Emergency Allotments Guidance   USDA-FNS
SNAP Online Purchasing Pilot	ALL	2020	None	SNAP approved retailers can provide online grocery shopping for SNAP recipients. Only eligible food may be purchased with SNAP benefits; delivery fees and other associated charges may not be paid for with SNAP benefits.	To a list of approved states or see which retailers are approved in each state, simply click on the approved state: FNS Launches the Online Purchasing Pilot   USDA-FNS  The SNAP Online Purchasing Pilot began April 2019 in the State of New York, followed by Washington in January 2020. The pilot was rapidly expanded during 2020.
Quality Control Face to Face Waiver Extension through December	Blanket Approval to all states	April 2021 (Modification and extension)	December 2021	From July 1, 2021, through December 31, 2021, FNS will allow State agencies to suspend requirements at 7 CFR 275.12(c)(1) to conduct face-to-face interviews for QC active reviews. FNS is approving States to conduct telephone interviews in lieu of face-to-face interviews for all QC interviews conducted through December 31, 2021, regardless of the sample month.	Replaces: March 13, 2020; Extension: July 17, 2020; Extension: August 24, 2020  For list of states seeking and approved:  Flexibility to Allow Telephone Interviews In lieu of Face-to-Face Interviews for Quality Control Case Reviews   USDA-FNS

Waiver / Flexibility/ State Option Name	SNAP Population Covered	Release Date	End Date	What It Does	Notes
ABAWD Time Limit Suspension	Able-Bodied Adults Without Dependents subject to the SNAP time limit	May 20,2020	One month following lifting of federal public health emergency	FFCRA suspends the time limit for ABAWDs, except in certain circumstances.	If a State offers an ABAWD a slot in a work or workfare program, including a SNAP Employment and Training (E&T) program the individual is still subject to the time-limit. In addition, the State still needs to determine whether the ABAWD who was offered a slot in the work or workfare program had good cause for failure to comply.
15% increase in SNAP allotments	All SNAP households	January 1, 2021	September 30, 2021 (Extension)	The Continuing Appropriations Act 2021 provided this increase to June which was extended to September 30, 2021 through the American Recovery Act. This increase provides about \$28 more per person, per month, or more than \$100 more per month for a family of four, in additional SNAP benefits	Original: SNAP Temp Increase in Max Allotments COVID 12.28.20.pdf (azureedge.net)
Expanded eligibility for certain students Eligibility	College Students	January 2021	One month following the lifting of the federal public health emergency	Expands eligibility for certain college students if: The individual is eligible to participate in a State or Federally financed work study program during the regular school year, as determined by the institution of higher education; or 2) The individual has an expected family contribution (EFC) of \$0 in the current academic year.	
Waiver of SNAP Interview Requirement	ALL new SNAP applications and recertifications requiring interview	March 26, 2020  – Updated in the Continuing Appropriations Act of 2021	December 31, 2021	Adjust interview requirements through June 30, 2021, consistent with the terms and conditions of FNS' March 26, 2020, blanket approval.	SNAP-COVID19- AdjustInterviewRequirements.pdf (azureedge.net)  For listing of states: SNAP – Adjusting Interview Requirements Due to Novel Coronavirus (COVID-19)   USDA-FNS

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Waiver / Flexibility/ State Option Name	SNAP Population Covered	Release Date	End Date	What It Does	Notes
Core Verification and Interview Adjustment	Recertification	March 26, 2020	Extended in the Continuing Appropriations Act 2021 through June 30, 2021 / Potential extension:  Extension of SNAP COVID-19 Administrative Flexibilities May 2021 and Beyond	Conduct streamlined interviews for at least 50% of non-elderly or disabled households	March 26, 2020 (Original)
Extend Certification Periods; Waive Periodic Reports	Recertification	March 26, 2020	Extended in the Continuing Appropriations Act 2021 through June 30, 2021 / Potential extension:  Extension of SNAP COVID-19 Administrative Flexibilities May 2021 and Beyond	Under authority provided in the Families First Coronavirus Response Act, allows states to extend certification periods and temporarily waive periodic report form submissions for households whose certification periods expire within a set timeframe, waiving 7 CFR 273.10(f)(5)	March 26, 2020 (Original)
Telephonic Signature	SNAP Applicants	March 26, 2020	Extended in the Continuing Appropriations Act 2021 through June 30, 2021 / Potential extension: Extension of SNAP COVID-19 Administrative Flexibilities May 2021 and Beyond	FNS allowed states to document in writing in the case file that a client verbally attested to the information provided on the application, instead of requiring an audio recording of the verbal attestation to constitute a valid telephonic signature.	For listing of states approved by month: SNAP - Allowing Telephonic Signatures in Response to Novel Coronavirus (COVID-19)   USDA-FNS

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Waiver / Flexibility/ State Option Name	SNAP Population Covered	Release Date	End Date	What It Does	Notes
Data Matching	SNAP Applicants	April 2020	June 30, 2021 Potential Extension: Extension of SNAP COVID- 19 Administrative Flexibilities May 2021 and Beyond	FNS will allow states to suspend the use of the Income and Eligibility Verification System (IEVS)	CA
Suspend In- Person application & verification collection	SNAP recipients	April 2020	June 30, 2021 Potential Extension: Extension of SNAP COVID- 19 Administrative Flexibilities May 2021 and Beyond	FNS will allow approved states to suspend in-person collection of applications and verification documents from households.	OH MS
SNAP claims processing	SNAP recipients with overpayment claims, state agency	April 2020	Potential Extension: Extension of SNAP COVID- 19 Administrative Flexibilities May 2021 and Beyond	FNS will allow state agencies to suspend SNAP regulations at 7 CFR 273.18(d) by allowing flexibility in the time frame for establishing or disposing of new claims. States are also permitted to suspend SNAP regulations at 7 CFR 273.18(e)(1) and (e)(5) by not requiring collection of active recoupment of SNAP overpayments, delaying collection on newly established overpayments, and not considering any payments delayed due to this suspension to be delinquent	MD MA NC
Fair Hearings	SNAP recipients	April 30, 2020	Potential Extension: Extension of SNAP COVID- 19 Administrative Flexibilities May 2021 and Beyond	FNS will provide state agencies flexibility to extend the fair hearings process up to 120 days from receipt of the request for fair hearings that were already in process or for which requests are received. Also, the time frame for sending notices confirming oral withdrawal requests may be extended up to 30 days from receipt of the request for such requests received during this same timeframe	MI MA HI NC
Issuance of Excessive Replacement Card Notices	SNAP recipients	April 2020	2 weeks after offices open	FNS will allow states to temporarily suspend issuance of replacement card notices due to office closures and mandated remote work. At the conclusion of this waiver period, the state agency will send the delayed notices to affected households.	<u>DE</u> <u>WV</u>

Waiver / Flexibility/ State Option Name	SNAP Population Covered	Release Date	End Date	What It Does	Notes
Extend SSN Good Cause Period	SNAP applicants	April 2020	Potential Extension: Extension of SNAP COVID- 19 Administrative Flexibilities May 2021 and Beyond	FNS will allow the state agency to extend the timeframe for an individual to participate in SNAP after having established good cause for failure to provide a Social Security Number (SSN) for up to an additional 3 months, to address COVID-19-related closures of Social Security Administration offices.	<u>IL</u> <u>WA</u>
Revise Authorized Representative Requirements	SNAP applicants with Authorized Reps	April 2020	Potential Extension: Extension of SNAP COVID- 19 Administrative Flexibilities May 2021 and Beyond	FNS will permit states to allow certain community partners and advocates to sign an application as an authorized representative of a household based on the household's verbal assent.	<u>L</u> <u>DE</u>

## SNAP WAIVER REQUESTS AFTER MAY 1, 2020: FNS extending month-to-month waivers for up to eight (8) months

Starting in May 2021, FNS began permitting adjustments issued under the authority of FFCRA to be approved for up to 8 months (<u>until Dec. 31, 2021</u>) with a requirement for the state to confirm the presence of a state emergency or disaster declaration (state declaration) at 3-month intervals, or until the end of the month subsequent to the month in which the public health emergency declaration related to COVID-19 is lifted by the Secretary of Health and Human Services, whichever comes first.

Here is a list of these adjustments:

- Telephonic Signature;
- Extend SSN Good Cause Period;
- Suspend the Use of Income and Eligibility Verification System (IEVS) for ongoing households;
- Suspend In-Person Application and Verification Submissions; and
- Revise Authorized Representative Requirements.

# Requesting Waivers Under 7 CFR 272.3(c)(1)(i):

Starting in May 2021, FNS began permitting waivers issued under the authority of 7 CFR 272.3(c)(1)(i) to be approved for up to 8 months (<u>until Dec. 31, 2021)</u>, or until the end of the month after the month in which the public health emergency declaration related to COVID-19 is lifted by the Secretary of Health and Human Services, whichever comes first.

Here is a list of these adjustments:

- Temporary Suspension of Claims Activity.
- · Waive Fair Hearing Timeframes; and
- Extend Administrative Disqualification Hearing (ADH) Timeframes

# Requesting CR Options as FFCRA Adjustments, beginning July 1, 2021

Certain types of adjustments, which were originally approved under the authority of FFCRA, were later made temporary state options as of Oct. 1, 2020, by the CR. These are often referred to as "CR options." This subset

of adjustments has not required the same month-by-month review and approval process. Most of these options expired by or on June 30, 2021, except for the option to use periodic reporting procedures to recertify households.

States that require use of adjustments that were considered state options under the CR beyond their expiration as a state option may request an adjustment under the authority of FFCRA for up to 6 months (until Dec. 31, 2021) with a requirement for the state to confirm the presence of a state emergency or disaster declaration (state declaration) at 3-month intervals, or until the end of the month subsequent to the month in which the public health emergency declaration related to COVID-19 is lifted by the Secretary of Health and Human Services, whichever comes first.

## Here is a list of these adjustments:

- Extend certification periods for up to 6 months and adjust periodic reports.
- Use periodic reporting procedures to recertify households (can be used for households with recertification periods set to expire on or before December 31, 2021).
- Waive initial and recertification interviews in the following ways:
  - By not requiring an interview at application, provided identity has been verified and all other mandatory verifications at 7 CFR 273.2(f)(1) have been completed.
  - o By not offering a face-to-face interview when requested.
  - By not requiring households eligible for expedited service to complete an interview prior to approval, provided identity has been verified and an attempt was made to contact the household for an interview

## Timeline for Flexibility Extensions Beyond December 2021, If Needed

If a state agency believes that any of the COVID-19 flexibilities will be necessary beyond Dec. 31, 2021, the state may submit an extension request in October 2021 that justifies the additional extension. For a state-by-state listing, see the USDA website and download the spreadsheet.

# **EXPIRED SNAP COVID-19 RESPONSE WAIVERS**

Waiver / Flexibility/ State Option Name	SNAP Population Covered	Release Date	End Date	What It Does	Notes
45 Day Quality Control Due Date Extension for SNAP Case Reviews	Offered to all States. States who selected waiver listed: Quality Control Due Date Extension for June 2020 Case Reviews   USDA-FNS	September 2020	December 2020	States were given an additional 45 days to report the findings of all cases selected for the December 2019, January 2020, February 2020, June 2020 sample months without the need to provide a separate justification as required at 7 CDFR 275.21(b)(4).	Replaces March 2020 memo: SNAP-COVID-QC-Due-Date-Extension  Originally covered: 45 Day Quality Control Due Date Extension for December 2019 through February 2020 Case Reviews
Extension of certification periods during the pandemic	Recertification	April 2020	December 2020.	FNS will permit state agencies to use periodic report procedures for household due to recertify to establish a new certification period. This may only be applied to households that have not had their certification periods previously extended through other adjustments	DC LA MA WV PA
Extend Administrative Disqualification Hearings (ADH) Timeframes	SNAP recipients subject to ADH timeframes	July 2020	December 2020	This waiver allows state agencies to extend the timeframe for the full ADH process to a maximum of 180 days from the time of the hearing notification, and the potential postponement period up to 60 days.	NC NC