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Executive Deputy Commissioner

# **General Information System (GIS) Message**

Section 1	
Transmittal:	20 TA/DC096 Upstate and New York City
Date:	October 13, 2020
То:	Subscribers
Suggested Distribution:	Commissioners, Temporary Assistance (TA) Directors, and Supplemental Nutrition Assistance Program (SNAP) Directors
From:	Jeffrey Gaskell, Deputy Commissioner Employment and Income Support Programs
Subject:	COVID-19 SNAP Interview Requirement and Certification Period Extension Waiver Renewals
Effective Date:	Immediately
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## Section 2

Title VI, Section 4603(a)(1)(B) of the Continuing Appropriations Act, 2021, and Other Extensions Act, the Continuing Resolution (CR) recently passed by Congress and signed into law by the President on October 1, 2020, reinstated the lapsed Supplemental Nutrition Assistance Program (SNAP) interview adjustment waivers and certification extension period waiver originally authorized under the Families First Coronavirus Response Act. The CR reinstated and extended the <u>availability</u> of these waivers through June 30, 2021.

The SNAP interview adjustment waivers originally were described in <u>GIS TA/DC022</u>, dated March 31, 2020, and <u>GIS TA/DC026</u>, dated, April 3, 2020. <u>GIS TA/DC026</u> superseded <u>GIS TA/DC022</u>.

The purpose of this GIS is to advise social services districts (districts) about the availability of these waivers and to provide guidance about their application. **These adjustments will be in effect from October 1, 2020 through December 31, 2020**. OTDA will evaluate the need for future extensions to certification periods.

#### **SNAP Interviews at Initial Application and Recertification**

Districts will not be required to interview households applying for SNAP at initial application or recertification, provided that **both** of the following conditions have been met:

- the applicant's identity has been verified; and,
- all other mandatory information and verification has been provided and is valid.

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If either of these conditions has **not** been met, then an interview will be required according to regular interview policy and processes. Districts will be required to interview the household if any of the information or verification submitted is unclear or cannot be verified through separate verified-upon-receipt data matches. Every attempt shall be made to verify household circumstances through data matching and information currently present in the State and district systems.

## **Initial SNAP Applications Eligible for Expedited Processing**

As districts are aware, for applications eligible for expedited processing, the only information that must be verified prior to the initial expedited issuance is the applicant's identity. (We remind districts that an applicant's identity can be verified via the SSN validation process in accordance with Section III.E.1 of 12-INF-06.) All other verification required and necessary to establish eligibility for ongoing benefits and to determine the ongoing benefit amount may be pended but must be provided prior to the issuance of ongoing SNAP benefits.

Until December 31, 2020, any applications for SNAP that are screened and found eligible for expedited processing, if the identity of the applicant has been verified, and if sufficient information for making a determination of eligibility and for calculating a benefit has been provided (verification of this information can be pended), the application may be processed and an expedited benefit issued without an interview being attempted or taking place. Please note, that districts are not prohibited from doing interviews, just not required.

When processing an application for **ongoing** SNAP benefits, if all mandatory verification has been submitted prior to the issuance of ongoing benefits, no interview is required.

## **Mandatory Verification**

Federal regulation 7 CFR 237.2(f) requires the following information to be verified at application. SNAP policy guidance on the verification of the following mandatory eligibility factors has not changed in response to the COVID-19 public health emergency:

- 1. Identity
- 2. Social Security Number
- 3. Residency
- 4. Gross non-exempt income (earned and unearned)
- 5. Disability
- 6. Alien eligibility

Under **federal** rules, verification of other eligibility factors, such as household size and composition, shelter cost and utility expenses are only required if the information provided is questionable. (See Section III.D of 12-INF-06 for a definition of questionable information.)

Please see 12 INF-06 (<a href="http://otda.ny.gov/policy/directives/2012/INF/12-INF-06.pdf">http://otda.ny.gov/policy/directives/2012/INF/12-INF-06.pdf</a>) for further information regarding SNAP verification policy.

## **Certification Period Extension Waivers**

The purpose of permitting further six-month SNAP certification period extensions is to help states and districts re-distribute and balance the SNAP recertification workload throughout the federal fiscal year ahead and promote the timely approval of benefits for eligible households. The original certification period extensions and much higher than normal application volumes during the Spring of 2020 resulted in a higher than normal volume of recertifications for the period of October through December 2020 and a much lower volume throughout the remainder of federal fiscal year 2021 (10/1/20 through 9/30/21) for Rest of State districts. For New York City, the extensions and application volumes have resulted in a much higher volume of recertifications through March 2021 and a much lower volume for the months of April through September 2021.

**Districts are not required to extend certification periods.** Districts interested in the mass extension of certification periods should notify the OTDA SNAP Bureau of their interest, and SNAP Bureau staff will contact them to work through the details. Notifications of intent should be sent by email to Michelle Kirk at <a href="Michelle.Kirk@otda.ny.gov">Michelle.Kirk@otda.ny.gov</a> with a courtesy copies to <a href="Wendy.DeMarco@otda.ny.gov">Wendy.DeMarco@otda.ny.gov</a>, and to the district's SNAP Bureau and Field Operations Bureau liaisons.

Cases with previous certification period extensions may not be extended again. That is, cases that had their certification period extended during the extensions that took place during the prior period of certification period extensions may not have their certification period extended again. The aim of all plans should be to balance the recertification workload for the year ahead. Districts should assess the monthly recertification numbers for the period of October 2020 through September 2021 and develop a plan to even out the recertification workload. The OTDA SNAP and Field Operations Bureaus can provide technical assistance with the plan development.

## **Temporary Assistance certification period extensions**

Similar to SNAP, OTDA will permit districts to extend certification periods for TA cases for six-months in an effort to help districts re-distribute and balance the TA recertification workload and promote the timely approval of benefits for eligible households. The original certification period extensions and much higher than normal application volumes during the Spring of 2020 resulted in a higher than normal volume of recertifications for the period of October through December 2020 and a much lower volume throughout the remainder of federal fiscal year 2021 (10/1/20 through 9/30/21) for Rest of State districts. For New York City, the extensions and application volumes have resulted in a much higher volume of recertifications through March 2021 and a much lower volume for the months of April through September 2021.

Districts interested in the mass extension of certification periods should notify the OTDA TA Bureau at: <a href="mailto:otda.sm.cees.tabureau@otda.ny.gov">otda.sm.cees.tabureau@otda.ny.gov</a> of their interest, and TA Bureau staff will contact them to work through the details.

Cases with previous certification period extensions may not be extended again. That is, cases that had their certification period extended during the extensions that took place during the prior period of certification period extensions may not have their certification period extended again. The goal of all plans should be to balance the recertification workload for the year ahead. Districts should assess the monthly recertification numbers for the period of October 2020 through September 2021 and develop a plan to even out the recertification workload.