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**Institute for Health
and Social Policy**

EXECUTIVE SUMMARY

SNAP WAIVERS AND ADAPTATIONS DURING THE COVID-19 PANDEMIC: A SURVEY OF STATE AGENCY PERSPECTIVES IN 2020

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American Public Human Services Association



ABOUT THE AUTHORS

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The Johns Hopkins Bloomberg School of Public Health (JHSPH) located in Baltimore, Maryland is the largest school of public health in the world, with over 80 centers and institutions and ongoing research in over 60 countries. As a leading public health research institution, JHSPH seeks to advance the evidence base for the practice of public health and strengthen local, national, and global partnerships with public health practitioners. The authors on this report are affiliated with the Institute for Health and Social Policy (IHSP), a research collaborative within JHSPH that seeks to advance public policies that improve health, quality of life, and wellbeing of people and communities. The JHSPH authors focus their research on food insecurity and nutrition policy as social determinants of health.

American Public Human Services Association (APHSA)

APHSA is a bipartisan national membership association representing state and local health and human services agencies and the subject matter experts that help execute their mission to improve outcomes for people nationwide. Building on our long-standing relationships with health and human services leaders, we focus on generating pragmatic solutions that advance the well-being of individuals, families, and communities. APHSA's members are experts in administering, overseeing, and aligning programs that build resilience and bolster the well-being of people through access to food, health care, housing, employment, childcare, community support, and other key building blocks. Our members are also leading experts in performance measurement and data analysis, health and human services IT systems, workforce development and training, and the legal dimensions of the field. Notable among our members are state SNAP administrators and their teams, including those representing SNAP Education, SNAP Outreach, and SNAP Employment & Training.

CITATION

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FULL REPORT

For more detail about the research methodology and results presented here, and to view tables, figures, and appendices, please see the full report, accessible [here](#).

INTRODUCTION

SNAP Waivers and Adaptations During the COVID-19 Pandemic: A Survey of State Agency Perspectives in 2020 is a study conducted by the Johns Hopkins Institute for Health and Social Policy (IHSP) based at Johns Hopkins Bloomberg School of Public Health and the American Public Human Services Association (APHSA). This research seeks to understand perspectives from state SNAP administrators on the successes, challenges, and lessons learned from waivers and flexibilities used to preserve equitable access to SNAP during the COVID-19 pandemic. Based on state agency survey responses, this report summarizes key findings from the first calendar year of pandemic response and provides policy considerations for the future of SNAP. This research was supported by Healthy Eating Research, a national program of the Robert Wood Johnson Foundation.

PROJECT AIMS & RESEARCH OBJECTIVES

This study answers the following research questions:

1. Which program adaptations or waivers hold promise for improving access to SNAP for communities in the short- and long-term?
2. Under what conditions are waiver flexibilities needed?
3. What barriers, facilitators, and best practices exist for scaling these program changes within and across states?
4. What modifications or additional waiver flexibilities, congressional actions, or forms of technical assistance are needed to ensure equitable access to nutritious food through SNAP?

METHODOLOGY

This report synthesizes results from an online survey of state SNAP administrators conducted between December 14, 2020, and January 29, 2021. The survey was sent to contacts in all 50 states and the District of Columbia, and 43 states (83%) responded. APHSA, as the membership association representing state and local human services agencies, identified state contacts through its existing engagement with SNAP program staff. Each state survey included a unique link that could be shared among multiple state SNAP personnel. The survey was organized into three sections: baseline characteristics (defined as prior to January 31, 2020), implementation of program flexibilities (after January 31, 2020), and reflections.

Program flexibilities were organized into four distinct programmatic areas:

- 1. Certification Periods and Interview Adjustments** - waivers pertaining to extension of certification periods, adjustment of periodic reporting, and adjustment of interview requirements
- 2. Application Support and Case Resolution** - adjustment of telephonic signature requirements, changes to administrative hearings, suspension of overpayment claims collection, and technology enhancements for client application processes
- 3. Food Assistance and Food Purchasing** - emergency allotments and the Online Purchasing Pilot
- 4. Communications and Customer Engagement** - methods of communicating pandemic-related shifts in program administration to clients, and waivers and adaptations in SNAP Outreach, SNAP-Ed, and SNAP Employment & Training (E&T)

RESULTS

The results of the survey were organized into five sections: Certification Periods and Interview Adjustments, Application Support and Case Resolution, Food Assistance and Food Purchasing, Communications and Customer Engagement, and Reflections and Future Directions.

CERTIFICATION PERIODS AND INTERVIEW ADJUSTMENTS

To receive SNAP, households must complete an initial interview to establish a certification period. In states operating under simplified reporting, households must then complete a periodic report to indicate household changes that may impact benefit levels or eligibility. For a household to be recertified and continue to receive benefits when a certification period is up, they must complete a recertification interview and complete accompanying paperwork. In response to the COVID-19 pandemic, SNAP agencies were given options to waive initial and recertification interviews, as well as to extend certification periods and adjust periodic reporting. The following are key findings and insights from states regarding selection of these waiver options:

1. States heavily relied on, and highly valued, certification period and interview adjustment waivers throughout the pandemic response.

Most states used these waivers at the onset of the pandemic, and many continued to utilize the waivers for the rest of the year due to large increases in SNAP and related program applications, reduced staffing capacity, and concern for the health of clients and staff. These waivers largely supported states in retaining timely and necessary access to SNAP as need increased and states shifted to remote work.

>90% of state respondents agreed the waiver of interviews and extension of certification periods were important for maintaining SNAP benefit access in the early months of the pandemic.

2. The structure of early certification and periodic reporting waivers created downstream workload management challenges for states.

The waiver to extend certification periods required states to extend all recertifications due during the waiver period by six months, despite concerns raised at the outset and alternative approaches requested by states. Many states felt that this waiver, while providing temporary relief as applications spiked at the beginning of the pandemic, created more work down the road when recertifications became due. Some states decided to use this waiver only during the first few months of the pandemic but did not request the waiver in later months after recognizing the “bottleneck” created by pushing recertifications back by 6 months. Alternative approaches, such as more flexibility in the length of time that recertifications could be delayed, were viewed more favorably by states.

3. Timing of waiver guidance and approvals had a significant impact on states' abilities to use waivers.

At the start of the pandemic, interview and certification waivers were authorized for 2-3 months and then were continued on a month-to-month basis. Throughout the summer of 2020, waiver requests were frequently denied or approved within days of the requested implementation period; sometimes, states did not receive approval until after their requested implementation period had already started. With systems changes and client notifications needing to be completed well in advance of any program change, this uncertainty proved difficult and administratively burdensome. Many states reported that these delayed approvals influenced their decisions to select waivers over this period.

4. The degree of flexibility built into interview and certification waivers had a significant impact on states' uses and perceptions of waivers.

In September of 2020, the USDA Food and Nutrition Services (FNS) offered a limited, prescriptive waiver (referred to as the "Core Verification and Interview Adjustment") for states to adjust interviews for a subset of SNAP recipients in an attempt to help states transition off of certification and interview waivers. However, these waivers were only selected by a handful of states. States reported that, as designed, these waivers offered limited benefits while creating new tracking and reporting challenges. In contrast, at the time of this survey, over half of states had already begun using the waivers authorized in the Continuing Resolution passed on October 1, 2020, which allowed for greater flexibility and a longer authority to deploy interview and certification waivers. States valued the ability to adapt waivers offered through the Continuing Resolution in more customized ways that reflect states' specific needs.

5. Most states continued conducting interviews in more targeted ways even when operating under interview waivers.

For example, states reported conducting interviews at the requests of clients, when there were discrepancies between reported and verified income, when information was missing or incomplete, and in accordance with local office capacity.

APPLICATION SUPPORT AND CASE RESOLUTION

This section of the report analyzed changes in customer support and case resolution related to the application process, including the use of telephonic signatures, conduct of administrative hearings, collection of overpayments, and technology improvements to support remote application processes.

1. The waiver of audio recordings for telephonic signatures was viewed positively by states and could be adopted long-term.

For states or parts of states that were not previously able to audio record telephonic signatures, this waiver proved beneficial to support virtual application processing and was not perceived as negatively impacting program integrity.

2. States were limited in their expansion and adoption of new technology for SNAP case functions.

Most states already provided online access to SNAP applications prior to the pandemic and relied on existing available technology to provide clients remote access to apply for SNAP and manage their

case during the pandemic. In general, there was greater online access than telephonic or mobile-friendly services, indicating opportunities for longer-term investments to further modernize SNAP case processing.

3. Most states made staffing changes to support SNAP workloads.

In order to respond to the increases in SNAP caseloads, a majority of SNAP agencies required additional staffing support, which was commonly achieved by redeploying workers from other SNAP areas or from other programs in the agency. States were less likely to hire new staff or procure new resources, possibly because of the time needed to recruit and train new staff and restrictions on the use of contracted staff.

61% of state agencies made staffing adaptations to support application processing during the pandemic.

4. Most states were able to quickly phase out waivers to adjust claims collections and fair hearing procedures.

While many states found these waivers to be important in the early months of the pandemic, most states were able to transition off of them by the fall.

FOOD ASSISTANCE AND FOOD PURCHASING

Early in the pandemic, Congress took action to increase SNAP benefits for all households that were not already receiving the maximum benefit allotment for their household size. Separately, FNS expanded food purchasing options by opening participation in the Online Purchasing Pilot to all states. This section of the report analyzes state perceptions of these two program options.

1. Most states would have preferred to issue emergency allotments to all households, including those already receiving the maximum benefit.

FNS's interpretation of the emergency allotment language in the Families First Coronavirus Response Act (FFCRA) only permitted the additional benefit to be allotted to households not already receiving the maximum benefit. Most states felt this interpretation left behind the people who needed additional benefits the most. As of April 1, 2021, FNS revised its guidance, permitting states to issue emergency allotments to all households.

63% of states would have preferred to provide supplemental SNAP benefits to all households, including those already receiving the maximum benefit.

2. Monthly approvals for emergency allotments were burdensome and resulted in delayed benefit issuance.

As with other waivers, FNS only approved states for emergency allotments one month at a time, which proved administratively burdensome and created challenges in communicating with both clients and program staff.

3. Despite rapid expansion of the Online Purchasing Pilot during the pandemic, states identified significant structural barriers that must be overcome for retailers and clients to utilize online purchasing more broadly in SNAP.

Although the quick expansion of the Online Purchasing Pilot was a significant step toward increasing equitable food access, additional investment is needed to onboard smaller retailers, expand access in rural communities, and cover delivery and other fees for SNAP recipients.

COMMUNICATIONS AND CUSTOMER ENGAGEMENT

With the many program changes and adaptations to a virtual environment, states had to shift their communication and interactions with clients. This section of the report explores how states communicated mass changes in response to the pandemic and specifically explores shifts in SNAP Outreach, SNAP-Ed, and SNAP E&T.

1. States relied on existing mass communication tools to inform clients about program changes.

In general, states utilized their existing platforms to notify clients of new flexibilities such as the changes in interview and recertification processes, emergency allotments, and the expansion of the Online Purchasing Pilot. States heavily relied on social media to communicate changes in the program. Very few states added new modes of communication and opportunities remain to build out text messaging and email-based modes of communication to supplement mail notification.

2. Most states modified SNAP-Ed and SNAP E&T to make these programs relevant and accessible during the pandemic, but the programs still experienced challenges engaging clients.

These two programs, while very different, both relied heavily on in-person activities prior to the pandemic. Although few changes were made to the types of services provided during the pandemic, many states made shifts within existing activities to support virtual services, for example, by moving SNAP-Ed curricula online or offering online SNAP Employment & Training meetings. In the shift to remote programming, both services experienced challenges maintaining client engagement.

>60%

of state respondents experienced similar or lower levels of engagement in SNAP-Ed and SNAP E&T during the pandemic.

REFLECTIONS AND FUTURE DIRECTIONS

States offered several reflections on how waiver flexibilities and other program adaptations implemented in 2020 have shifted their views about what is needed for the future of SNAP.

1. Federal policy that allows automatic triggers of waivers would help states better respond to future emergencies.

In future emergencies, states would like to see several of the waivers offered in 2020, such as the certification, interview, and quality control review waivers, be automatically triggered to allow for more efficient and effective crisis response.

>90% of state respondents would like the extension of certifications and waiver of interviews to be available as automatic options in future emergencies.

2. Alternative approaches to interviews prove promising and should be further tested and evaluated after the pandemic.

Only one-third of states believe that current rules that dictate interview requirements are a best practice for SNAP administration. States have varied opinions on preferred alternatives. Interview adjustments currently in use provide a potential pathway for states to continue testing alternative approaches after the pandemic.

3. States were unable to obtain waivers for hot and prepared foods and college student eligibility early in the pandemic.

Several states submitted waivers early in the pandemic to allow for the purchase of hot and prepared foods and to expand SNAP eligibility for college students, but received denials from FNS. Although flexibilities for college students were made available in January 2021, the lack of these flexibilities early in the pandemic contributed to inequities in program access and benefits.

4. Pandemic-EBT (P-EBT) was a barrier to implementing SNAP flexibilities in some states.

State SNAP agencies implemented new waivers and program flexibilities to maintain benefit access for clients, while at the same time standing up a completely new program, P-EBT, using the same staff and tools. Approximately half of states felt that implementation of P-EBT impacted their ability to manage core functions of SNAP case processing during this period.

RECOMMENDATIONS

Based on these findings, we offer the following preliminary recommendations for strengthening access to SNAP. More detailed recommendations will be developed based on focus group discussions with state agencies and presented in a second report at a later date.

CODIFY AUTHORITY FOR WAIVER FLEXIBILITIES THAT ARE TRIGGERED FOR FUTURE STATE OR NATIONAL EMERGENCIES.

Congress should establish automatic mechanisms for states to access program flexibilities in times of future state or national emergencies. Program flexibilities should be modeled off the approach taken in the October 2020 Continuing Resolution that provided states more lenient options for how to apply waivers to their specific caseloads. Furthermore, automatic waiver flexibilities should be expanded to include hot and prepared foods, college students, and telephonic signatures. Having these options available would allow states to proactively develop emergency response plans ahead of an emergency, saving precious time early in their response when flexibilities are most greatly needed.

“It was much easier for the States to have the option to implement and not have to write a waiver request. It allowed us to be nimble and make decisions based on current circumstances and then act immediately.”

– State Survey Respondent

TEST PROGRAM CHANGES THAT INCREASE THE EFFICIENCY OR IMPROVE THE DELIVERY OF SNAP BENEFITS TO HOUSEHOLDS.

The variety of ways in which states have utilized waivers during the pandemic has created a natural experiment to test alternative approaches to current SNAP program rules, and states shared a range of viewpoints on potential best practices in program administration that differ from current standard rules. As states transition out of their public health emergencies, FNS should encourage states to utilize SNAP demonstration authority to rigorously test these approaches to inform policy changes. State survey responses indicate there may be particularly strong interest in alternative approaches to conducting certification and recertification interviews, capturing telephonic signatures, and performing face-to-face quality control interviews. Guidance on a path forward for these efforts should be provided quickly so that states can transition as seamlessly as possible from current waivers into potential demonstrations. Congress should consider existing and future evidence to evaluate potential permanent modifications to current program rules in upcoming legislation.

“There isn’t always a one size fits all approach [...] The ability to support additional flexibility for specific state circumstances, while supporting public health needs would be a much more [amenable] policy during emergencies.”

– State Survey Respondent

HELP STATES MODERNIZE THEIR STAFFING AND TECHNOLOGY INFRASTRUCTURE.

Federal policymakers should help states build modern platforms that are resilient in times of crisis and reflect the evolving ways in which people engage with services. While states were largely able to support virtual services for customers and remote case processing for workers, the infrastructure to support these functions lags behind current available technology. Needed investments span a range of areas, such as building mobile-friendly applications, developing electronic modes of client communication, deploying intelligence tools to streamline case review functions, increasing availability of online purchasing, and expanding mobile and virtual EBT benefit access and management. Prior federal initiatives such as SNAP Process and Technology Improvement Grant demonstrations provide a model for how federal stakeholders can support state and local investments going forward.¹ However, federal stakeholders should also consider policies that can help accelerate this work. For example, restrictions in use of non-merit staff limit the value of Call Center operations to support application processing. Conflicting program rules and lack of integrated funding for system modernization makes aligning services across SNAP and related programs difficult.²

“As the majority of our client interactions moved from in-person to telephone, we deployed many of our local office staff to telecommuting [...] The one drawback was not having the technology available for these telecommuters to utilize the existing IVR functions to obtain verbal attestations or signatures.”

– State Survey Respondent

PROVIDE TECHNICAL ASSISTANCE AND BUILD THE EVIDENCE BASE ON VIRTUAL SERVICES.

With strong interest from states to continue to provide virtual and remote services for SNAP customers across a range of areas after the pandemic, FNS should support states through technical assistance and research that strengthen and improve their understanding of best practices in service delivery. Specific insights are needed within specialized areas of SNAP services such as SNAP E&T, SNAP-Ed, and SNAP Outreach, as well as general program administration functions such as web-based recertifications and periodic reports, virtual client notifications, and online benefit access and repayment portals. Future research should incorporate client perspectives to better understand how these services are used, their benefits, and their limitations. Current federal performance management priorities remain laser focused on program integrity and payment accuracy; additional resources to measure and improve customer service are critical to ensure the next wave of SNAP modernization prioritizes equitable program access.

“Many SNAP-Ed agencies did not actively use social media prior to the pandemic, so there was a significant transition, particularly in building a following with the qualifying SNAP-Ed audience.”

– State Survey Respondent

¹ U.S. Department of Agriculture Food and Nutrition Services. (2020). FY 2020 SNAP Process and Technology Improvement Grants. Retrieved from <https://www.fns.usda.gov/grant/fy-2020-snap-process-and-technology-improvement-grants>

² U.S. Department of Agriculture Food and Nutrition Services. (2020). Revised Guidance for Use of Vendor/Private Staff in Call Centers: 2020 Update. Retrieved from <https://www.fns.usda.gov/snap/non-merit-system-personnel-guidance-call-centers-2020-revision>