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of PUBLIC HEALTH

**Institute for Health
and Social Policy**

FULL REPORT

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

JUNE 2021

APHSA

American Public Human Services Association



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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.

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EXECUTIVE SUMMARY

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>

INTRODUCTION

Background

When the COVID-19 pandemic first gripped the nation in March 2020, the federal government activated its systems of support to help communities navigate the public health and economic fallout. As grocery store shelves emptied and food insecurity surged, the Supplemental Nutrition Assistance Program (SNAP) – the largest anti-hunger program in the country – came into the spotlight as a critical part of the public response to the pandemic.¹ Commonly regarded as one of the most responsive and effective programs during economic downturns, the pandemic posed new, unprecedented challenges for SNAP and the agencies that implement it.²

SNAP policies are governed by the United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) and implemented by state agencies, often with local support. States implement SNAP in accordance with prescriptive rules authorized by Congress and interpreted by FNS that dictate who is eligible, what benefits eligible households can receive, and what steps they must go through to qualify for and renew their benefits. Within a matter of days, the pandemic caused an exponential growth in applications while implementing agencies shut down in-person services and shifted to remote work. These sudden changes required states to overhaul their business models – how people apply for assistance, how caseworkers process benefits, how supportive services are provided, and more. To reflect these changes, Congress had to quickly enact new laws to authorize changes in state and local implementation and FNS had to rapidly provide ensuing guidance that established how states could utilize new program flexibilities.

In the subsequent days, weeks, and months, state agencies carried out their missions under these unique and trying circumstances, using new waivers and program flexibilities to preserve access for current and new recipients while operating within parameters set by federal partners. The experiences of state agencies in navigating these changes present an important opportunity to learn what worked, what barriers were encountered, and what lessons can be learned to inform future SNAP services.

Research Design and Methods

To understand state agency perspectives on the federal waivers made available to support SNAP implementation during the pandemic and the corresponding shifts in program operations made by states, a mixed methods research project was conducted, including two components:

Part 1: A nationwide survey of state SNAP administrators, which primarily addressed program adaptations and waiver flexibilities implemented by states in 2020, and

Part 2: Focus group discussions with state SNAP administrators to add context to state survey responses, address new program adaptations and waiver flexibilities offered in

¹ U.S. Department of Agriculture Food and Nutrition Services. (2021). Supplemental Nutrition Assistance Program. Retrieved from <https://fns-prod.azureedge.net/sites/default/files/resource-files/34SNAPmonthly-3a.pdf>

² Keith-Jennings, B. & Rosenbaum, D. (31 March 2015). SNAP Benefit Boost in 2009 Recovery Act Provided Economic Stimulus and Reduced Hardship. Center on Budget and Policy Priorities. Retrieved from <https://www.cbpp.org/research/food-assistance/snap-benefit-boost-in-2009-recovery-act-provided-economic-stimulus-and>

2021, and collect state perspectives on promising practices and lessons learned for future implementation of SNAP.

Collectively, this research set out to answer the following 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?

Findings Included in This Report

This report reflects part 1 of the project, which includes descriptive statistics, key findings, and recommendations for SNAP policy from a nationwide survey of state SNAP agencies conducted between December 2020 and January 2021. Part 2 of the project will incorporate findings from focus group discussions conducted in the spring of 2021. The second report will be released at a later date with updated analyses and recommendations. This report is organized into five sections:

Section 1. Certification Periods and Interview Adjustments

SNAP rules generally establish that households must go through an eligibility process that includes an interview at initial application and each time a household’s certification period must be renewed. Households with certification periods longer than six months must report whether they have experienced any changes in their circumstances that impact their eligibility or benefit levels, known as a periodic report. This section of the report explores state waivers to temporarily extend certification periods, adjust periodic reports, and waive interview requirements.

Section 2. Application Support and Case Resolution

This section of the report explores state waivers to adjust federal rules pertaining to collecting audio recordings of telephonic signatures, collecting overpayment claims from SNAP clients, and conducting fair hearings for households appealing decisions related to their SNAP case. This section of the report also captures information on changes in state staffing models and use of technology to support case processing functions during the pandemic.

Section 3. Food Assistance and Food Purchasing

Early in the pandemic, Congress took action to increase food assistance for existing SNAP recipients by allowing states to raise households to the maximum SNAP benefit amount for their given household size. Separately, FNS took action to expand food

purchasing options by opening its Online Purchasing Pilot to all state SNAP agencies, opening the possibility for online purchasing of groceries throughout the country. This section of the report analyzes state perceptions on the implementation of these two program options.

Section 4. Communications and Customer Engagement

This section of the report analyzes how states communicated with and engaged SNAP recipients generally during the pandemic, and specifically explores changes in client engagement within three distinct program areas: SNAP Outreach, SNAP-Education (SNAP-Ed), and SNAP Employment & Training (E&T).

Section 5. Reflections and Future Directions

This section of the report captures state reflections on the driving factors that influenced their SNAP pandemic response and perspectives on program changes that should be permanently incorporated for future crisis response or ongoing program implementation.

METHODOLOGY

Survey Administration and Participant Recruitment

We fielded an online survey of state Supplemental Nutrition Assistance Program (SNAP) administrators from December 14, 2020-January 29, 2021 using Qualtrics, an online survey research platform. The survey was sent to contacts in all 50 states and the District of Columbia, and 43 states (83%) responded. State contacts were identified by APHSA through existing engagement with SNAP program staff. A single survey was sent to each state, but the survey was collaborative and could be shared with multiple staff members across program functions, such as intake and certification, SNAP Outreach, SNAP-Education (SNAP-Ed), and SNAP Employment and Training (SNAP E&T). Respondents were permitted to share and edit responses within their state, skip to sections related to their area of expertise, and save responses to complete later.

Survey Measures

The survey included 121 items organized into three sections:

- 1. Baseline Characteristics:** We asked several questions about how states administered SNAP prior to the public health emergency (defined as prior to January 31, 2020). Several baseline questions were adapted from the USDA SNAP State Options Report, including use of integrated eligibility systems, joint applications, and joint application processing across human services programs.³ We also asked about application and case review options and procedures, technology capabilities, client communication methods, staffing models (including telework availability), and methods for delivering SNAP Outreach, SNAP-Ed, and SNAP E&T. Questions in this section were closed-ended multiple choice, with some questions allowing for selection of multiple options.
- 2. Implementation of Program Flexibilities:** We asked states about the waivers they selected and other program adaptations implemented during the pandemic (defined as after January 31, 2020). This section focused on four key case processing and administrative functions within SNAP:

Certification Periods and Interview Adjustments

We asked states whether they requested to extend certification periods, adjust periodic reports, and waive interviews; why these waivers were selected; and how states preferred to apply waivers to their caseloads. Questions generally followed four phases of availability of these waivers - early pandemic response (March-May), month-to-month waiver considerations (June, July, August), fall waivers (offered in September), and expanded availability offered by new statutory flexibility for interview and certification waivers (beginning October 2020).

³ US Department of Agriculture, Food and Nutrition Services. (2018). State Options Report, Supplement Nutrition Assistance Program. 14th Edition. Retrieved from <https://fns-prod.azureedge.net/sites/default/files/snap/14-State-Options.pdf>

Application Support and Case Resolution

We asked states about their use of other waivers and changes related to applying for SNAP and additional case handling functions, including fair hearings, overpayment claims, and telephonic signature waivers. We also asked about the addition or expansion of technology to support various case functions (e.g., the use of online portals to support document submission and recertifications) and staffing adaptations to support application processing and case management.

Food Assistance and Food Purchasing

We asked questions about the use of emergency allotments and if states would have preferred an option to increase benefits across all households, including those receiving the maximum benefit. We also asked about participation in the Online Purchasing Pilot, outreach to retailers, and retailer interest in online purchasing.

Communications and Customer Engagement

We asked how clients were notified of program changes and about modifications to outreach or communication activities (e.g., addition of outreach contractors, expansion of text messaging communication). We also asked about changes to the delivery of SNAP-Ed programming and SNAP E&T services (e.g., moving curricula online), as well as changes to curricular content or services.

The questions in this section were mainly closed-ended multiple-choice, with some questions allowing for selection of multiple options. At the end of each sub-section, an open-ended question allowed states to provide additional information about their use of waivers and program adaptations.

- 3. Reflections:** We asked states to reflect on their experiences implementing waivers and other adaptations to SNAP during the pandemic. States were also asked to offer recommendations for improving SNAP during the economic downturn and in future emergencies. Many of these questions asked states to rate statements using a Likert scale. For example, we asked about the importance of various program flexibilities for managing caseloads and supporting benefit access for new and existing beneficiaries on a four-point Likert scale ranging from “unimportant” to “very important”. At the end of the survey, an open-ended question allowed states to provide additional information or context about their experiences implementing SNAP during the pandemic and recommendations for the future.

Piloting

The survey was piloted with SNAP administrators from seven states, who provided feedback on the clarity and content of survey questions during a 60-minute teleconference call in December 2020. The survey was also shared with staff at FNS for their input.

Validation of Survey Responses

States were asked to report whether or not they “selected” waivers during the pandemic, and then asked follow-up questions based on their responses. In reviewing state responses, we determined that there were various scenarios in which states may have selected a waiver, but were not able to implement it, and this was not interpreted consistently across states. To ensure consistency, we compared each state’s response to information about waiver requests, approvals, and denials on the FNS website.⁴ If, according to FNS’ website, a state requested a waiver, we changed the state’s response from “not selected” to “selected” (regardless of whether the waiver was approved or denied). Corrections were required for 8% of responses (n=162) to questions regarding waiver selection. In this survey, “selecting” a waiver means the waiver was requested. After the waiver was requested, it could have been approved and implemented, approved but not implemented, or denied. If a waiver was “not selected”, it was not requested by a state.

Data Analysis

We calculated the number and proportion of states selecting each response to each survey question. When states selected “other” in response to a multiple-choice question, one of four actions was taken: (1) we re-classified the text response into an existing choice category; (2) we created a new choice category; (3) the response was dropped from analysis (if providing context, but not answering the question asked); or (4) the response was left as an “other” response. For some questions, we cross-tabulated state responses with characteristics of the state (e.g., total population). We selected representative quotations from open-ended questions, where relevant, to provide additional insight and depth to survey responses. Analyses were conducted in Stata Version 16.1 (College Station, TX) in January-March 2021.

Limitations

There were several limitations to the survey worth noting. First, the survey captures state perspectives on SNAP waivers and adaptations during the pandemic only through the date in which each agency completed the survey (December 14, 2020 - January 29, 2021). As such, the survey does not incorporate changes in state waiver usage after this date and several significant program changes that occurred during or after the survey was administered, including the 15% SNAP benefit increase, changes to college student eligibility, clarification on Quality Control payment error rates, amended emergency allotments guidance, and extension of availability of administrative waivers through December 2021. Second, the survey does not assess state perspectives on any of the Quality Control (QC) waivers that were offered or on the Pandemic EBT (P-EBT) program, which, while operated through SNAP agencies, is a standalone program newly created during the pandemic. The survey does assess how operation of P-EBT impacted other SNAP program functions that are within the scope of this project. Third, survey questions focused on state-level SNAP waivers and adaptations; therefore,

⁴ U.S. Department of Agriculture, Food and Nutrition Services. SNAP COVID-19 Waivers. Retrieved from <https://www.fns.usda.gov/programs/fns-disaster-assistance/fns-responds-covid-19/snap-covid-19-waivers>

county- and tribal-level variation in use and impact of waivers and flexibilities is not thoroughly assessed in the research. Fourth, interpretation of waiver “selection” varied across states and responses were corrected by the research team in accordance with documentation from FNS. Because some questions were only displayed to participants if they “selected” or “did not select” a waiver, these corrections resulted in a small increase in missing data. Lastly, while the project obtained survey responses from a significant majority of state SNAP agencies (83%), eight agencies did not respond. These eight agencies varied in waiver uptake (variety of waivers selected and duration of use), party control of governor, census region, and state population size. These gaps in knowledge will be addressed in follow-up focus group discussions in Spring 2021.

SURVEY FINDINGS

SECTION 1. CERTIFICATION PERIODS AND INTERVIEW ADJUSTMENTS

Background

This section describes state responses to waivers related to certification periods, periodic reports, and interviews, including:

- A summary of SNAP certification and interview requirements
- An analysis of early interview and certification waivers offered under the Families First Coronavirus Response Act (FFCRA)
- An analysis of the waivers to extend certification periods, adjust periodic reports, and waive interview requirements offered by FNS in September and through the Continuing Resolution beginning in October 2020
- An analysis of the impact of waivers to extend certification periods, adjust periodic reports, and waive interview requirements on state administrative procedures and SNAP beneficiaries
- A summary of key findings from the analysis

Summary of SNAP Certification and Interview Requirements

Statutory rules mandate that households applying for SNAP benefits must generally go through an eligibility process that includes an interview. The purpose of the interview is to review information reported on the application, explore and resolve unclear and incomplete information, and advise the applicant of their rights and responsibilities. States may conduct interviews telephonically or face-to-face (i.e., in person) but are required to grant requests for in-person interviews. Interviews are required at both the initial application and when recertifying eligibility.

State agencies have flexibility in how long they certify households for benefits but may do so for no longer than 24 months for households with an individual who is elderly or disabled and 12 months for all other households. Households certified for longer than six months are required to undergo a periodic report between certification periods. In the periodic report, households must report any changes that may impact SNAP eligibility or benefit levels, such as income or employment status. Households must complete recertification and periodic reporting requirements in a timely manner or risk losing their benefits. Households with very low income and resources are eligible for expedited service, which mandates states conduct an interview, establish eligibility, and provide benefits within seven days of an application being filed.

SECTION 1.1. EARLY INTERVIEW AND CERTIFICATION WAIVERS UNDER THE FAMILIES FIRST CORONAVIRUS RESPONSE ACT

Introduction

From February through June of 2020, as the coronavirus pandemic forced businesses to close and millions of individuals to lose their jobs, the number of people receiving SNAP increased by over 6 million – an unprecedented increase over such a short period of time.⁵ In response to increased SNAP caseloads and the need to preserve program access during an extended period of social distancing, the Families First Coronavirus Response Act (FFCRA) authorized FNS to offer waivers and flexibilities for states to ease administrative burden and maintain benefit access for new and existing SNAP beneficiaries. Using this authority, FNS offered the following certification and interview waiver options:

Extension of certification periods: Allowed states to extend certification periods set to expire by six months.⁶ For example, households with recertifications due in March 2020 were rescheduled to become due in September 2020.

Adjustment of periodic reports: Allowed states to adjust the periodic report requirement for ongoing cases and cases with extended certification periods.

Waiver of interview requirements: Allowed states to adjust interviews in three ways:

- Waive the requirement that households complete an interview at application or recertification;
- Waive the requirement to grant requests for face-to-face interviews at application and/or recertification; and/or
- Waive the requirement that households eligible for expedited service complete an interview prior to approval.

For each of these three waiver options, FNS allowed states to select blanket waivers for March-June, permitting states simply to notify FNS of their intent to do so (the initial waivers were offered for March-May and later extended for June). Beginning in July, FNS approved these waivers on a month-by-month, state-by-state basis in a more limited manner.

Selection of the Extension of Certification Periods, Adjustment of Periodic Reports, and Waiver of Interview Requirements

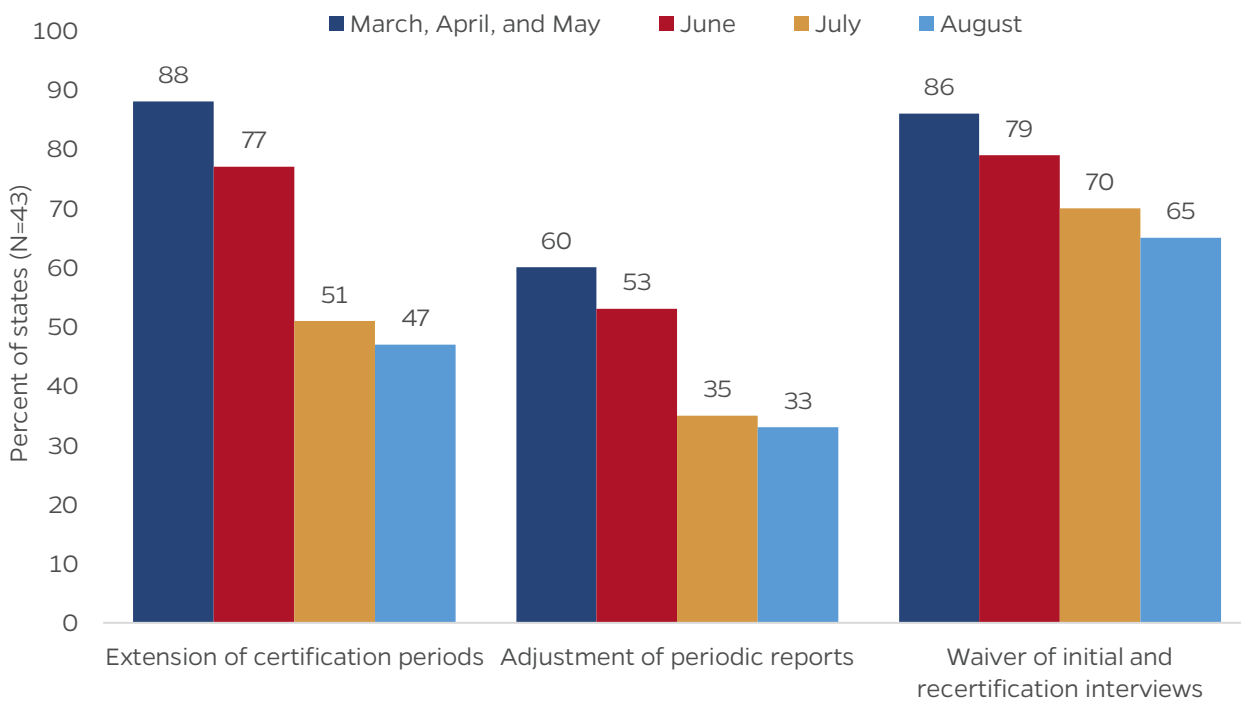
The initial blanket waivers for the extension of certification periods, adjustment of periodic reports, and waiver of interview requirements were widely requested (**Exhibit 1.1.1**). Most states selected the March-May blanket waiver for extension of certification periods (88%),

⁵ US Department of Agriculture, Food and Nutrition Services. (2020). <https://fns-prod.azureedge.net/sites/default/files/resource-files/34SNAPmonthly-1a.pdf>

⁶ In March through May, FNS approved states to extend certification periods and adjust periodic reports by six months. For cases due in June, FNS provided guidance allowing states to extend certification periods and adjust periodic reports by up to six months.

adjustment of periodic reports (60%), and waiver of initial and recertification interviews (86%); however, selection of these waivers declined substantially in July and August, particularly for the extension of certification periods and adjustment of periodic reports. The significant drop-off in waiver selection corresponded with denials of state requests to extend certification periods, adjust periodic reports, and waive interviews in early July; revised guidance in late July that allowed states previously denied waiver requests to submit requests for approvals for the remainder of July and August; and communication from FNS that waiver requests would be approved on a more limited basis in subsequent months.⁷

EXHIBIT 1.1.1. State Selection of Families First Coronavirus Response Act Waivers to Extend Certification Periods, Adjust Periodic Reports, and Waive Initial and Recertification Interviews in March-May, June, July, and August 2020



Waiver of Face-to-Face and Expedited Service Interviews

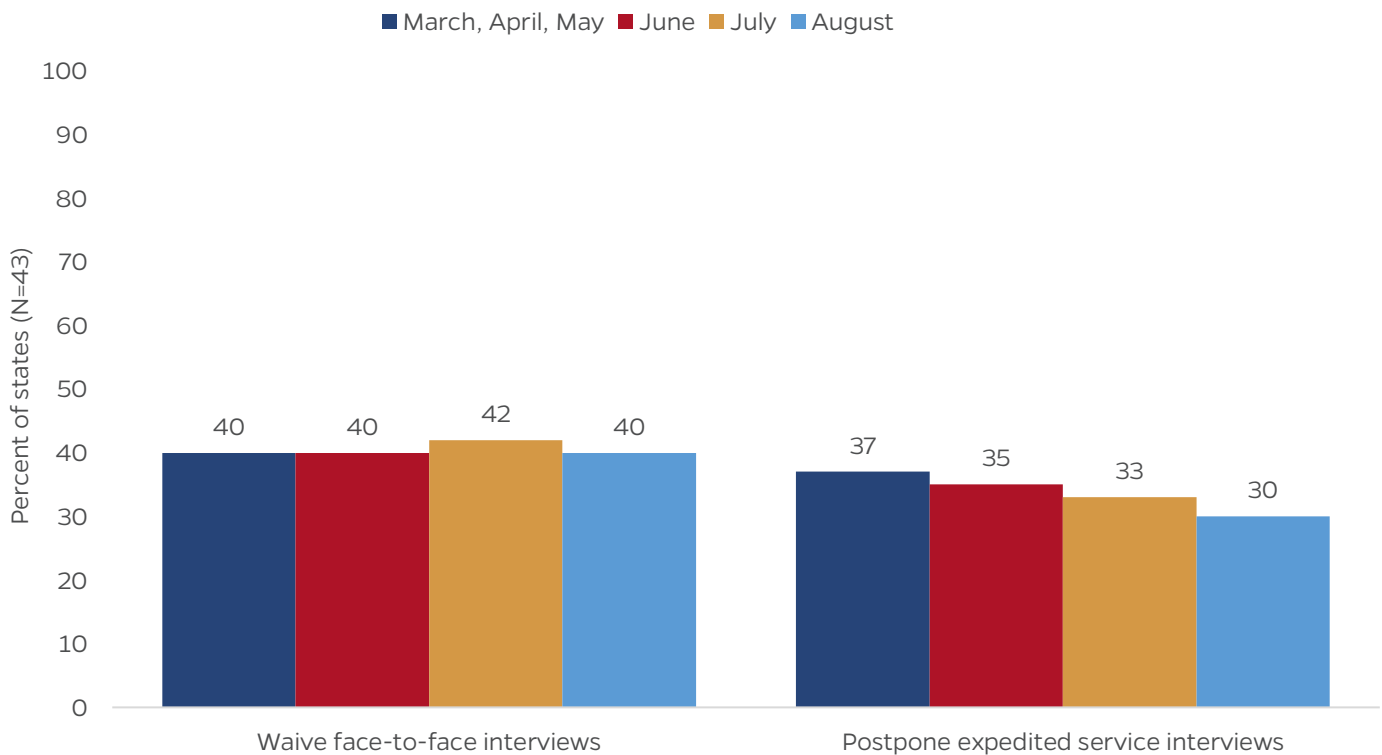
While survey questions regarding use of interview waivers primarily focused on the state option to waive the interview requirement at application and recertification, this research also

⁷ On August 7th, 2020, email correspondence from FNS to states said that the “Big Three” (Extension of Certification Periods, Adjustment of Periodic Reports, and Waiver of Initial and Recertification Interviews) would receive FNS approval on an extremely rare basis and requiring provision of sufficient data to justify the request. Instead, states were encouraged to use the new Core Verification and Interview Adjustment waiver or the “tiered” adjustments whenever possible.

captured state selection of two more targeted interview waivers that impact a smaller share of SNAP recipients: waiving the requirement to offer face-to-face interviews and not requiring interviews for households eligible for expedited service. Although most states provided the option for telephonic interviews prior to the pandemic, federal regulations mandate that states grant client requests for in-person interviews. Additionally, states are required to conduct interviews, determine eligibility, and issue benefits within seven days of application for households with very low income that are eligible for expedited service. FNS offered states the option to waive either or both of these interview requirements, in addition to the option to more broadly waive interview requirements.⁸

As shown in **Exhibit 1.1.2**, these more specific interview waivers were not utilized by as many states as the waiver of initial and recertification interviews. However, the waiver of face-to-face interviews was used consistently in March-May (40%), June (40%), July (42%), and August (40%). Use of the waiver to postpone expedited service interviews declined slightly from March-May (37%), through June (35%), July (33%), and August (30%).

EXHIBIT 1.1.2. State Selection of the Waiver of Face-to-Face Interviews and the Waiver to Postpone Expedited Service Interviews in March-May, June, July, and August 2020

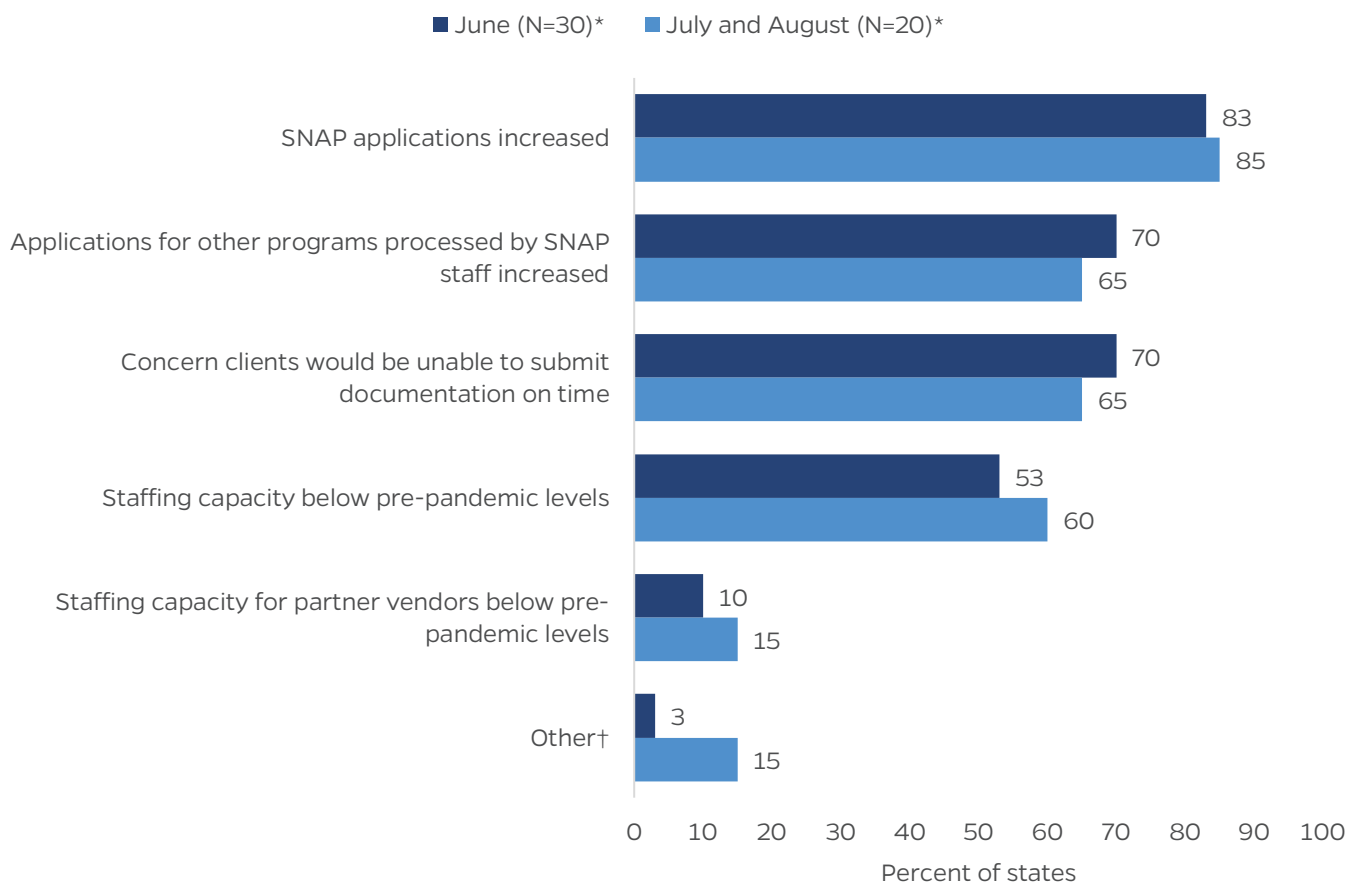


⁸ For several reasons, the option to waive the interview requirement and option to select either of these two more focused waivers are not mutually exclusive. For example, states may choose to waive interviews generally but still permit clients the option to request an interview and decide whether to allow those interviews to be in-person at the request of the client. States may also apply their interview waiver in specific geographic areas of the state and thus still use the expedited service interview waiver in areas where the broader waiver is not in effect.

Drivers of State Decisions to Select the Extension of Certification Periods and Adjustment of Periodic Reports

Although state selection of waivers to extend certification periods and adjust periodic reports declined in July and August, many states continued to request these waivers due to ongoing need. As shown in **Exhibit 1.1.3**, states that selected these waivers did so because of increases in SNAP applications (83% of states responding in June and 85% responding in July/August), increases in applications for other programs processed by integrated eligibility workers who also process SNAP applications (70% and 65%), concern that SNAP beneficiaries would be unable to submit documentation on time (70% and 65%), and reduced staffing capacity compared to pre-pandemic levels (53% and 60%).

EXHIBIT 1.1.3. Reasons for Selecting the Waivers to Extend Certification Periods and Adjust Periodic Reports in June, July, and August 2020



*States missing responses not included in denominator (n=3 in June and n=4 in July).

†Other reasons for selecting this waiver in June include not wanting clients to have to travel. In July/August, states selected these waivers because (1) they were setting up drop boxes at local offices; (2) they did not want clients in public if not necessary; or (3) practices varied by county.

2 out of 3 states

did not select the extension of certification periods and periodic report waivers in summer 2020 because they were concerned that extended cases would be difficult to manage when due.

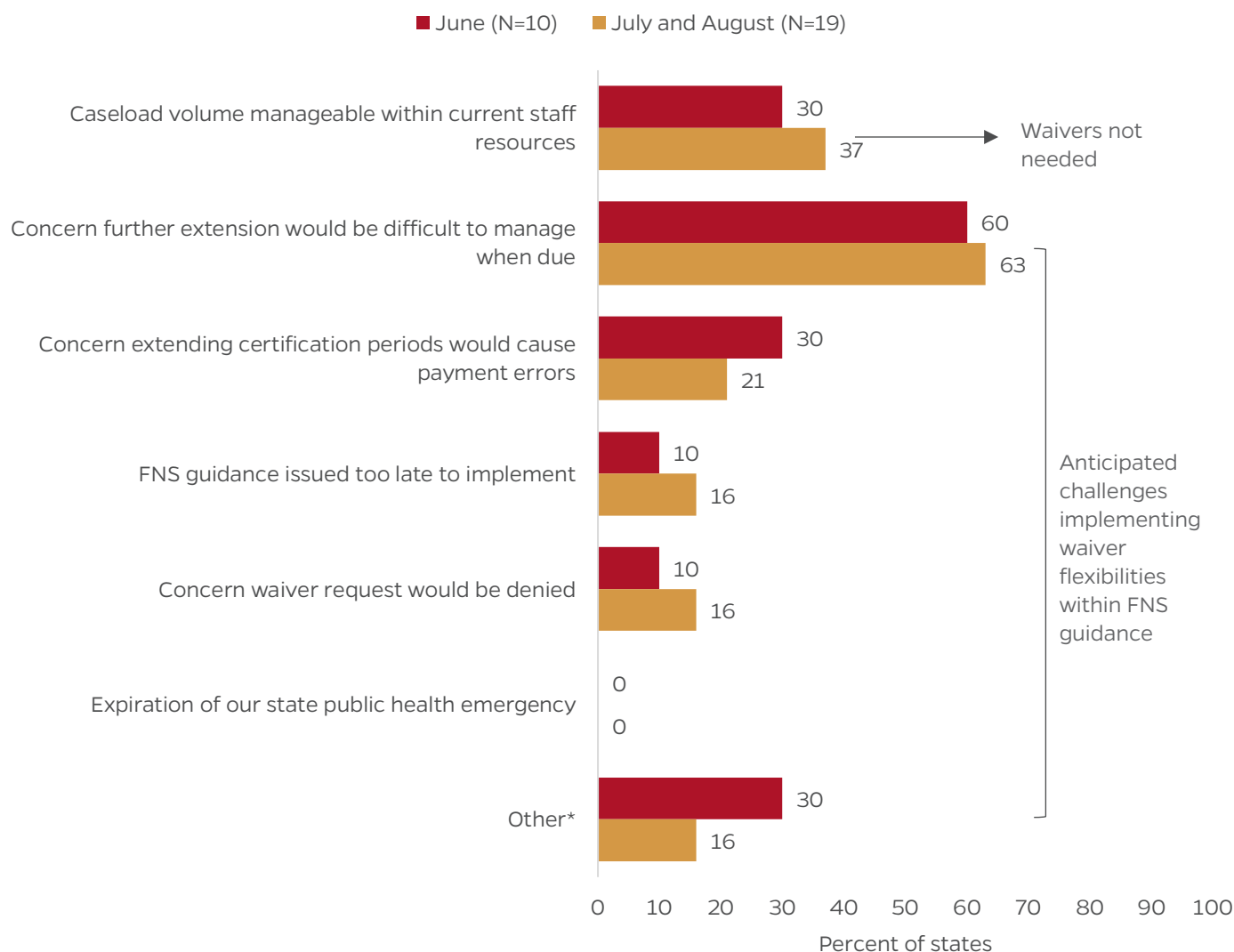
Conversely, the summer months represented a period in which some states began to transition off waivers to extend certification periods and adjust periodic reports. As shown in **Exhibit 1.1.4**, most states that did not select the extension of certification periods and adjustment of periodic report waivers in June or July/August made this decision because of anticipated challenges implementing waiver flexibilities in accordance with FNS guidance. Only one-third of states did not select these waivers because they felt they were not needed (30% in June and 37% in July/August). Nearly two-thirds of states did not select these waivers because they were concerned that further extensions would be difficult to manage when certifications became due (60% and 63%). Other, less frequently reported reasons for not selecting waivers were concern that further extensions would cause payment errors (30% and 21%), inability to implement waivers because FNS guidance was issued too late (10% and 16%), and concern that waiver requests would be denied (10% and 16%). In

open-ended responses, states reported challenges communicating further extensions to clients (when notices about recertification deadlines had already gone out) and reprogramming their IT systems to accommodate further extensions (when waiver approvals were issued within days of recertification due dates). State responses demonstrate that barriers to selecting these waiver flexibilities were a driving force in the decision-making of state agencies. As discussed in later analysis, several alternative policy approaches to certification and periodic reporting waivers may have helped to mitigate these barriers for some states.

"Our legacy system requires time to change, so advance notice to implement changes would be desired. We needed to utilize workarounds for the first couple of months because notices and forms had already been mailed out to recipients."

-State Survey Respondent

EXHIBIT 1.1.4. Reasons for Not Selecting the Waivers to Extend Certification Periods and Adjust Periodic Reports in June, July, and August 2020



*Other states did not select this waiver in June or July and August because of (1) significant client confusion about reporting responsibilities; (2) challenges communicating program changes with clients; or (3) IT systems issues.

Alternative Methods for Extending Certification Periods

Many more states may have selected the waiver to extend certification periods in June, July, and August had FNS allowed more flexibility in how states could apply this waiver to their caseloads. FNS’ March guidance established narrow parameters mandating that states choosing to extend certifications do so uniformly for all affected households by six months. By extending all certification periods due by six months (i.e., shifting recertifications due in March-May to September-November), states were required to process extended SNAP cases on top of existing cases regularly scheduled for review in the revised months. This policy created a sharp increase in case processing beyond the already increased number of SNAP applications states were handling. Furthermore, most states generally certify households for 12 months, and this policy permanently shifted cases due in March-May six months ahead. This may create an

imbalance in client recertification dates and workload not only in the short-term, but also in future years.

“Our workload more than doubled with the increased number of applications and it remains that way to date. We felt as though extending certification periods would just be kicking the can down the road, so to speak. The extensions for March, April and May coupled with the more than 300% increase of applications during those months just created a bottleneck of the workload in September, October and November.”

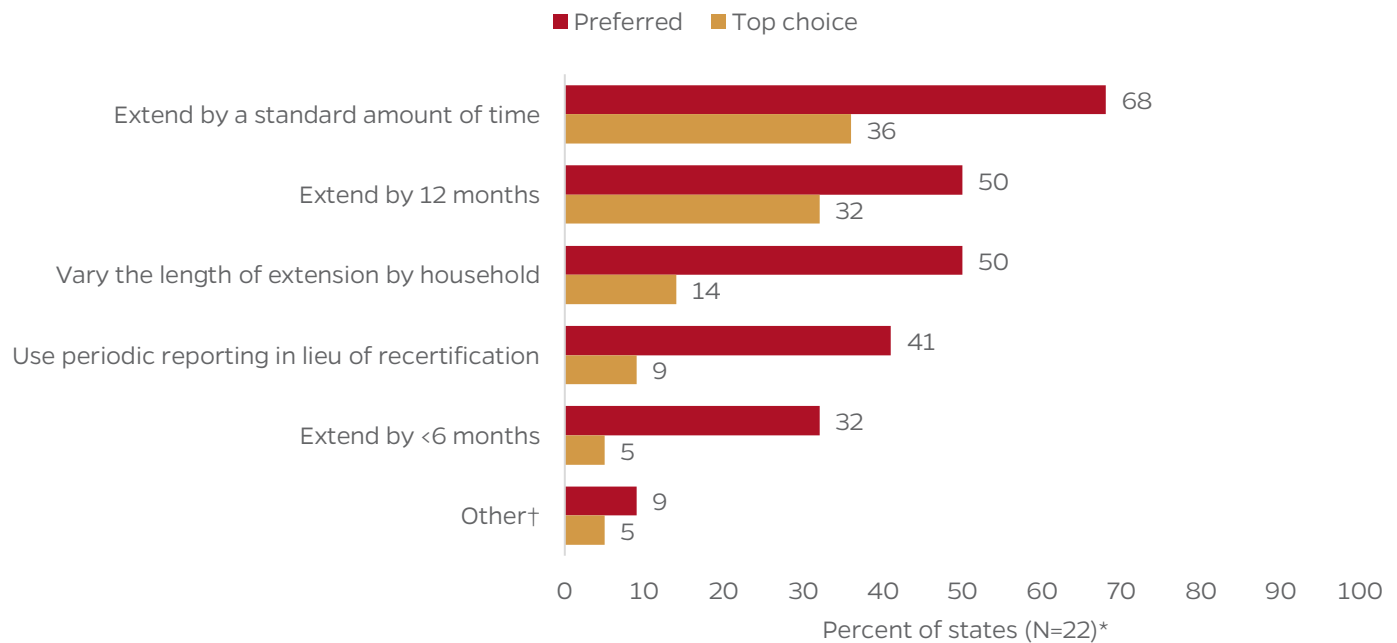
-State Survey Respondent

As evidenced in **Exhibit 1.1.5**, more than half of states in our sample (53%, n=23) either requested or would have preferred an alternative method of extending certifications that differed from FNS’ March guidance. In open-ended responses, states explained that extending all certifications by less than one year created additional work down the road. When offered alternative options, most states (68%) preferred to extend certifications for all households by a standard amount of time determined by the state and 35% ranked this method as their top choice for extending certification periods. Other preferred options included extending certifications by 12 months (50%), varying the length of extension by household to avoid all cases becoming due at the same time (50%), and using periodic reporting rules in lieu of full recertifications (41%). Before the pandemic, many states (81%) aligned SNAP certification periods with at least one other health and human services program (e.g., Medicaid, TANF). One state noted that they would have preferred to extend certification periods beyond six months as needed to maintain alignment with other programs. The data suggest that optimal solutions for extending certification periods are highly contingent on state-specific policies and system capabilities and that greater flexibility is needed to allow states to propose certification strategies that are effective and accommodate the needs of clients.

53%

of states either requested or would have preferred an alternative method of extending certifications that differed from FNS’ March guidance.

EXHIBIT 1.1.5. Alternative Methods of Extending Certification Periods and Adjusting Periodic Reports Preferred by States



*This question was asked of all states reporting they requested or would have preferred an alternative method of extending certification and adjusting periodic reports that differed from FNS' March guidance (53% of states in the sample). States missing responses not included in the denominator (n=1).

†Other states would have preferred to (1) make additional adjustments beyond 6 months to align recertification periods with other programs (e.g., Medicaid) or (2) auto recertify for a new certification period based on existing household information.

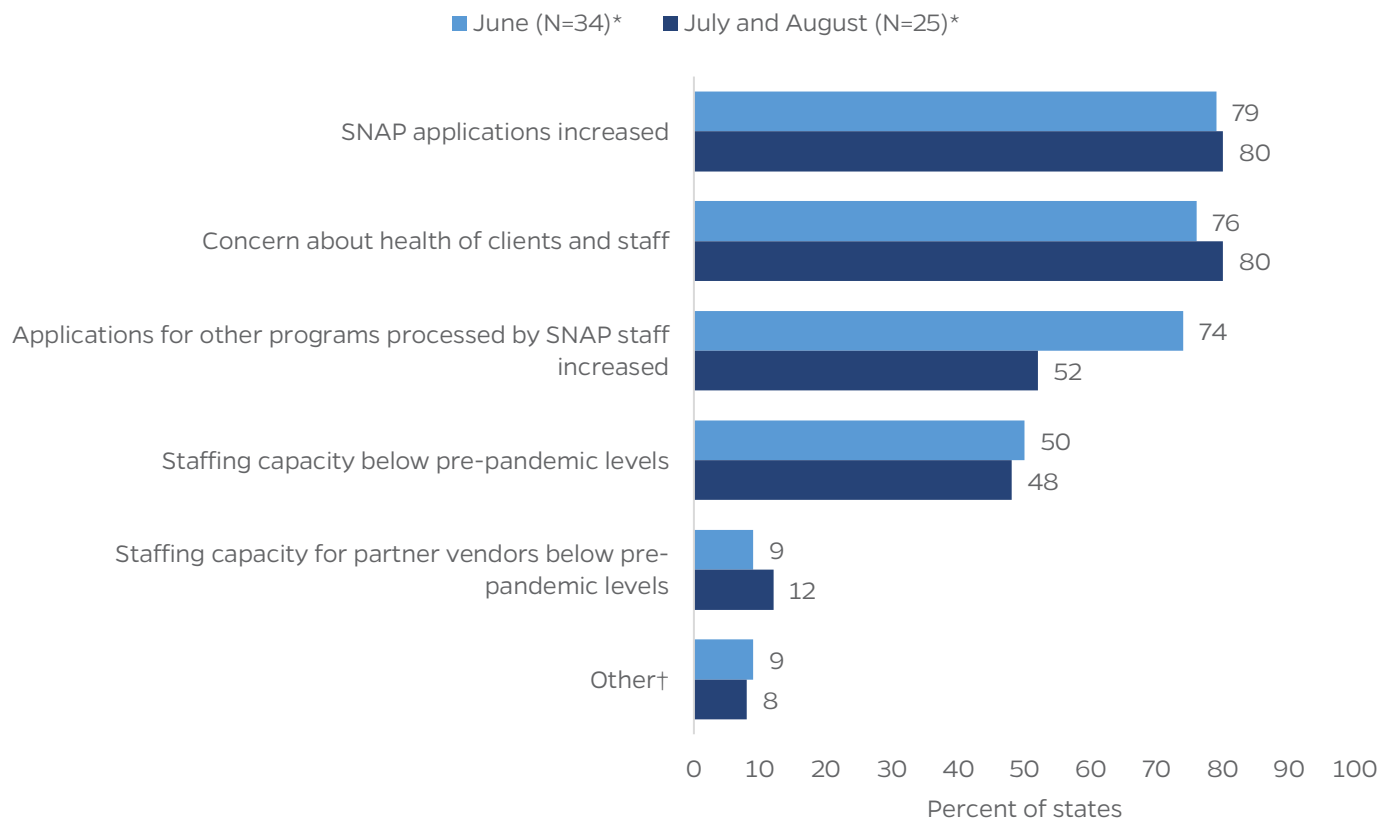
Drivers of State Decisions to Select the Waiver of Interview Requirements

Exhibit 1.1.6 summarizes the reasons why states requested to continue applying waivers of interview requirements in June or July/August. Most states reported their decision was based on continued increases in SNAP applications (79% in June and 80% in July/August), concerns for the health of clients and staff (76% and 80%), and because applications for other programs processed by SNAP integrated eligibility staff remained higher than pre-pandemic levels (74% and 52%). Fewer states reported that limited staffing capacity to process applications influenced their decision-making (50% and 48%).

“[The waiver of interview requirements] has been a tremendous contribution to our ability to respond to the application surge [...] this allowed for a streamlined process across all programs which promotes better outcomes for our customers and staff.”

-State Survey Respondent

EXHIBIT 1.1.6. Reasons for Selecting the Waiver of Interview Requirements in June, July, and August 2020

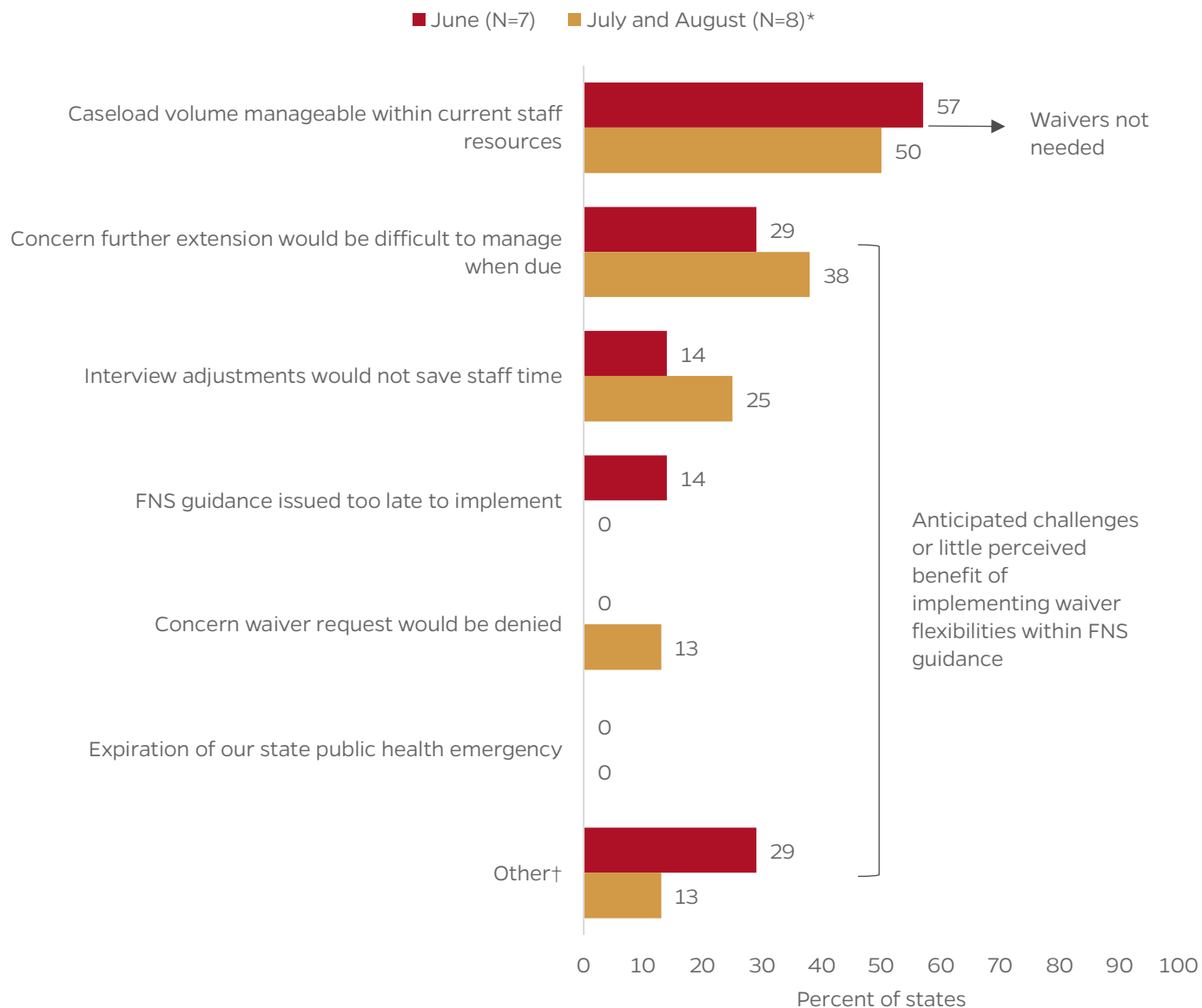


*States missing responses not included in the denominator (n=2 in June and n=9 in July/August).

†Other states selected these waivers in June because (1) their local offices were closed; (2) field staff were working out of their homes; or (3) for reasons that varied across county or tribal area. In July/August, states selected these waivers because of (1) concern about increased applications due to the expiration of pandemic unemployment insurance; (2) local offices were closed; or (3) for reasons that varied across county or tribal area.

Of the few states that did not select the waiver of interview requirements in June or July/August, most (57% in June and 50% in July/August) made this decision because their caseload volume was manageable within current staff resources, suggesting they did not need the waiver (**Exhibit 1.1.7**). Other reasons for not selecting these waivers were related to anticipated challenges or little perceived benefit of implementing waiver flexibilities. These data suggest that relative to certification and periodic reporting waivers, a greater share of states that opted not to continue interview waivers over the summer did so based on an assessment that the waiver was no longer needed (as opposed to barriers to implementing the waiver). However, as shown in **Exhibit 1.1.1**, most states continued to request interview waivers through the summer months.

EXHIBIT 1.1.7. Reasons for Not Selecting the Waiver of Interview Requirements in June, July, and August 2020



*States missing responses not included in denominator (n=1 for July/August).

†Other states did not select this waiver in June because (1) existing business model allowed for telephonic interviews with electronic signature; or (2) they needed to conduct interviews to certify for other programs (e.g., cash assistance) so continued to do so for SNAP. In July/August, states did not select this waiver because their existing business model allowed for telephonic interviews with electronic signature.

Changes in Interview Procedures

While most states chose to waive interviews through at least the summer, states had flexibility in deciding whether and under what circumstances they would conduct interviews while operating under the waiver. **Exhibit 1.1.8** shows that while operating under the initial blanket waiver of interview requirements, the majority of states continued to conduct interviews in

more targeted ways. Approximately half (49%) of states reported conducting interviews at the request of the client and when there was a discrepancy between reported income and income verified through automated data matches or other means (49%). A smaller subset of states reported conducting interviews when there was missing information (26%), changes in income (3%) or other documentation (5%) or based on local office capacity (13%). Only 18% of states reported not conducting any interviews while operating under the waiver, reporting that they used other means to verify eligibility and resolve questionable information in lieu of interviews.

EXHIBIT 1.1.8. Circumstances in Which Interviews Were Conducted Under the Waiver of Interview Requirements (N=39)

| Circumstances in which interviews were conducted | n (%) |
|--|----------|
| At the request of client | 19 (49%) |
| Discrepancy between reported and verified income | 19 (49%) |
| Missing or incomplete information | 10 (26%) |
| When local offices had capacity | 5 (13%) |
| When changes other than income was reported at recertification | 2 (5%) |
| When change in income reported at recertification | 1 (3%) |
| Other* | 7 (18%) |
| No interviews conducted | 7 (18%) |

*Other circumstances included (1) conducting all interviews, but not face-to-face; (2) scheduling interviews if unable to make contact with the client; (3) conducting interviews if the case would otherwise be closed or denied; (4) attempting to contact the client prior to waiving the interview; (5) conducting abbreviated interviews for individuals that met the criteria to expedite; (6) conducting interviews as appropriate; or (7) conducting initial interviews but not conducting recertification interviews due to extensions in July/August.

82% of states continued to conduct interviews under certain circumstances while under the waiver of interview requirements.

Most states that conducted interviews under the initial blanket waiver eliminated face-to-face interviews and relied on telephone interviews (**Exhibit 1.1.9**). A small subset of states increased video conferencing capacity for interviews during the pandemic and some states reported adjusting interview methods according to clients’ needs or varied the conduct of interviews across counties or tribal areas. Only 25% of states conducting interviews under the initial blanket waiver conducted face-to-face interviews during the pandemic, compared to 93% of states prior to the pandemic. States made many modifications to accommodate interviews

conducted over the phone or virtually (n=32). Some of these modifications were costly; states commonly purchased new equipment for staff, such as telephones or laptops (n=19) and invested in new IT infrastructure (n=19) to enable telephone or virtual interviews (**Exhibit 1.1.10**).

EXHIBIT 1.1.9. Conduct of Interviews Before and During the COVID-19 Pandemic

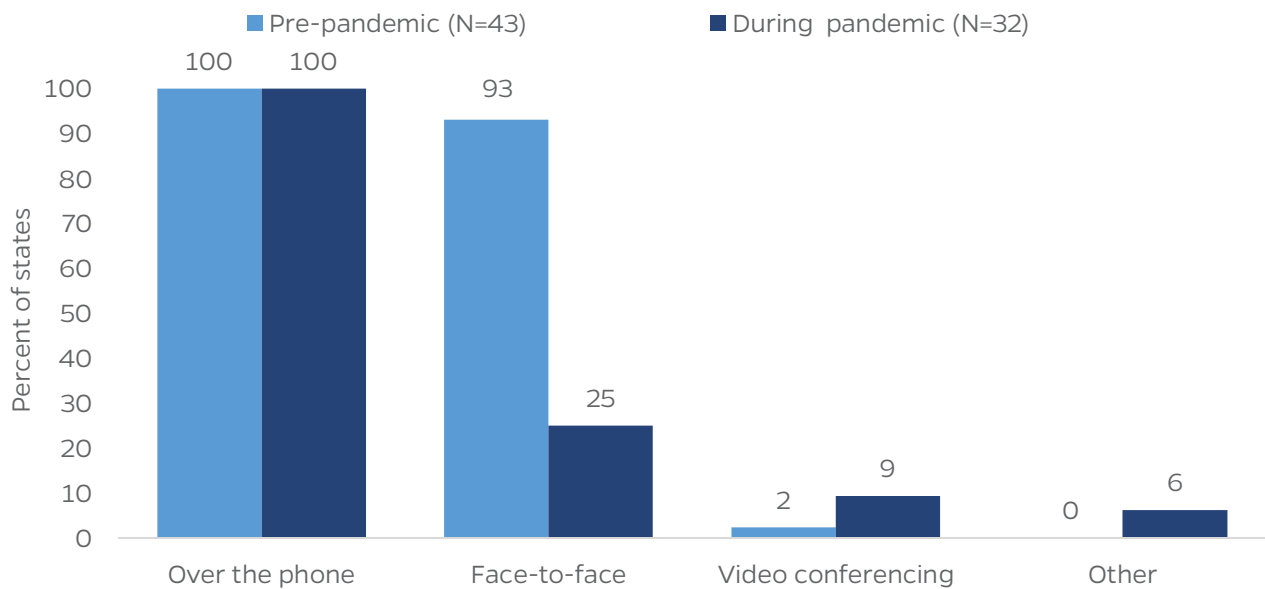


EXHIBIT 1.1.10. Modifications to Accommodate Phone or Virtual Interviews During the Pandemic (N=32)

| Modification | n (%) |
|--|----------|
| Purchased new equipment for staff (e.g., phones, laptops) | 19 (60%) |
| Invested in new IT infrastructure (e.g., new functionality, added VPN bandwidth) | 19 (60%) |
| Trained staff | 13 (41%) |
| Reallocated staff | 10 (31%) |
| Other* | 5 (16%) |
| None of the above | 6 (19%) |

*Other responses included (1) supports for telework staff; (2) modifications that varied by county or (3) by local office; (4) virtual eligibility centers, a statewide workshare model, and expanded telecommuting for eligibility staff; or (5) changes to Skype that allowed for queuing calls.

SECTION 1.2. EXTENSION OF CERTIFICATION PERIODS, ADJUSTMENT OF PERIODIC REPORTS, AND WAIVER OF INTERVIEW REQUIREMENTS OFFERED FOR FALL 2020

This section of the report assesses state agencies use of waivers to extend certification periods, adjust periodic reports, and waive interview requirements from September through December. This period of time can be divided into two distinct phases of waiver availability:

- Limited relief to interview and certification procedures prescribed by FNS (offered in August for the month of September 2020)
- Congressional action to provide broader, time-limited flexibility in waiver usage (October 2020 onward)

Limited Relief to Interview and Certification Procedures Prescribed by FNS

In August 2020, FNS issued correspondence to states that further extended certification periods and adjusted periodic reports, noted the waiver of interview requirements would be approved on an extremely rare basis, and offered two more limited adjustments and waivers that FNS would consider in lieu of such waiver requests:

Core verification and interview adjustments: Allowed states to conduct interviews for a minimum of 50% of non-elderly or disabled households. This waiver was less flexible than the initial blanket waiver and was provided by FNS with the intent to help states transition toward conducting 100% of interviews.

Periodic report flexibility for non-extended recertification cases: Allowed states to use periodic reporting rules to process cases due for recertification that had yet to be extended. Periodic reporting procedures do not require an interview and allow states to focus on limiting information collection to changes in household information that may impact eligibility or benefit levels. This flexibility was offered 10 days after the interview adjustment waiver.

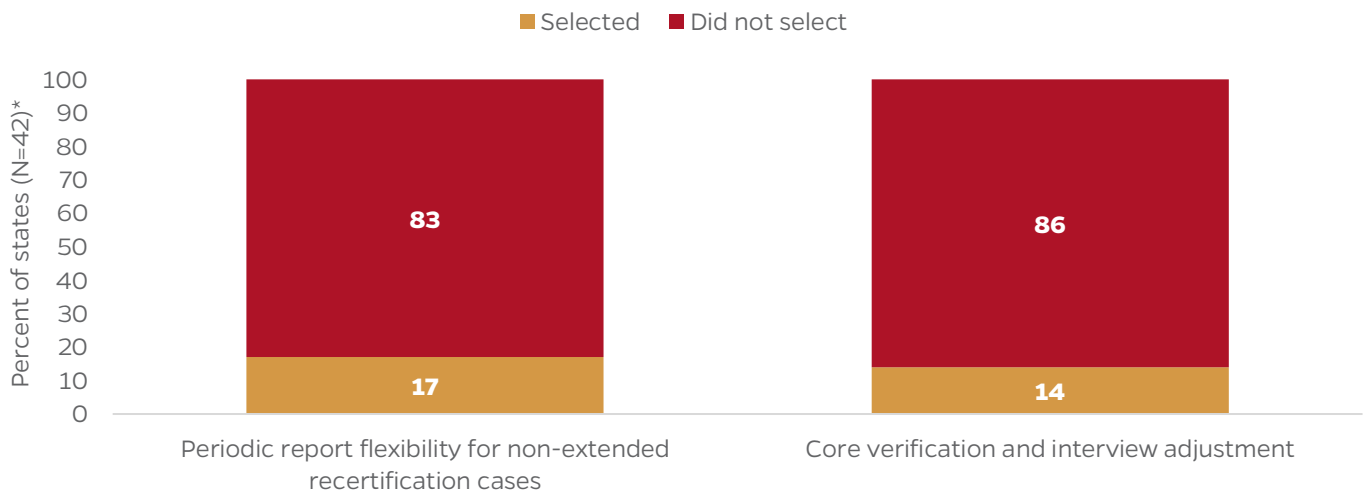
States were allowed to use only one of the two new waiver options made available by FNS.

Selection of Certification and Interview Waivers Offered by FNS

Exhibit 1.2.1 shows that a small percentage of states responding to this survey selected FNS' core verification and interview adjustment (14%) or periodic report for non-extended recertifications (17%) waiver. Compared to state waiver usage in August for waiver of initial and recertification interviews (65%), extension of certification periods (47%), and adjustment of periodic reports (33%), this represents a sharp decline in waiver usage from the prior month (Exhibit 1.1.1).

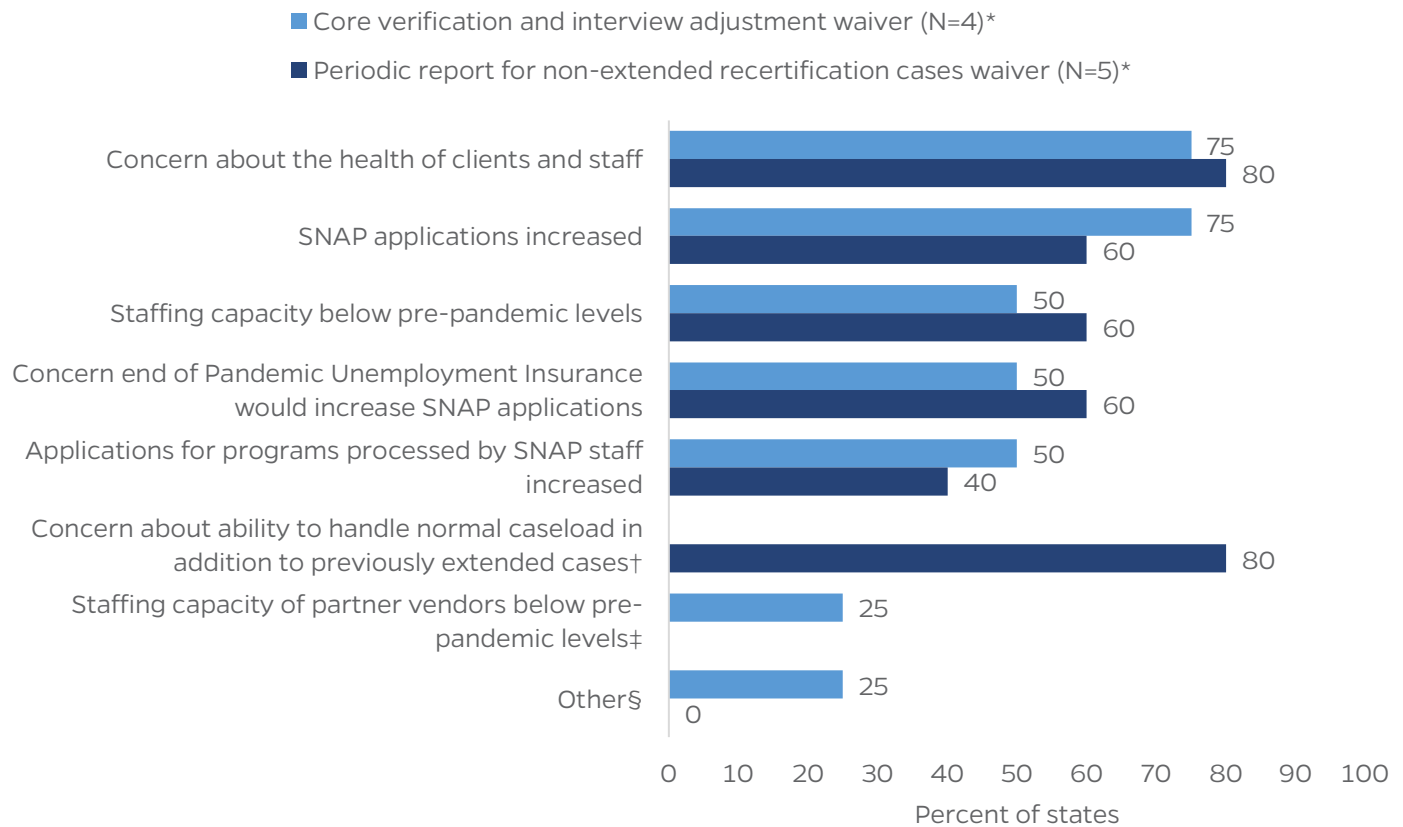
Of the small number of states that selected the core verification and interview adjustment (n=6) and periodic report for non-extended recertifications (n=7) waivers, four states responded with why they chose the core verification and interview adjustment waiver and five responded with why they chose periodic report for non-extended recertification cases waivers. Most states selected these waivers out of concern for the health of clients and staff (75% and 80%, respectively) (Exhibit 1.2.2). Other reasons for selecting these waivers were increases in SNAP applications (75% and 60%), low staffing capacity at the agency (50% and 60%) or partner vendors (25% for core verification and interview adjustment) and concern that the end of Pandemic Unemployment Insurance, which expired in August, would result in a significant increase in SNAP applications in the fall (50% and 60%). Of states that chose the periodic report flexibility for non-extended recertification cases, 80% reported doing so out of concern for their ability to handle a normal caseload in addition to previously extended cases.

EXHIBIT 1.2.1. Selection of Periodic Report Flexibility for Non-Extended Recertification Cases and Core Verification and Interview Adjustment Waivers



*States missing responses not included in the denominator (n=1).

EXHIBIT 1.2.2. Reasons for Selecting Core Verification and Interview Adjustment and Periodic Report Flexibility for Non-Extended Recertification Cases Waivers



*States missing responses not included in denominator (n=2 for core verification and interview adjustments and n=2 for periodic report for non-extended recertification cases).

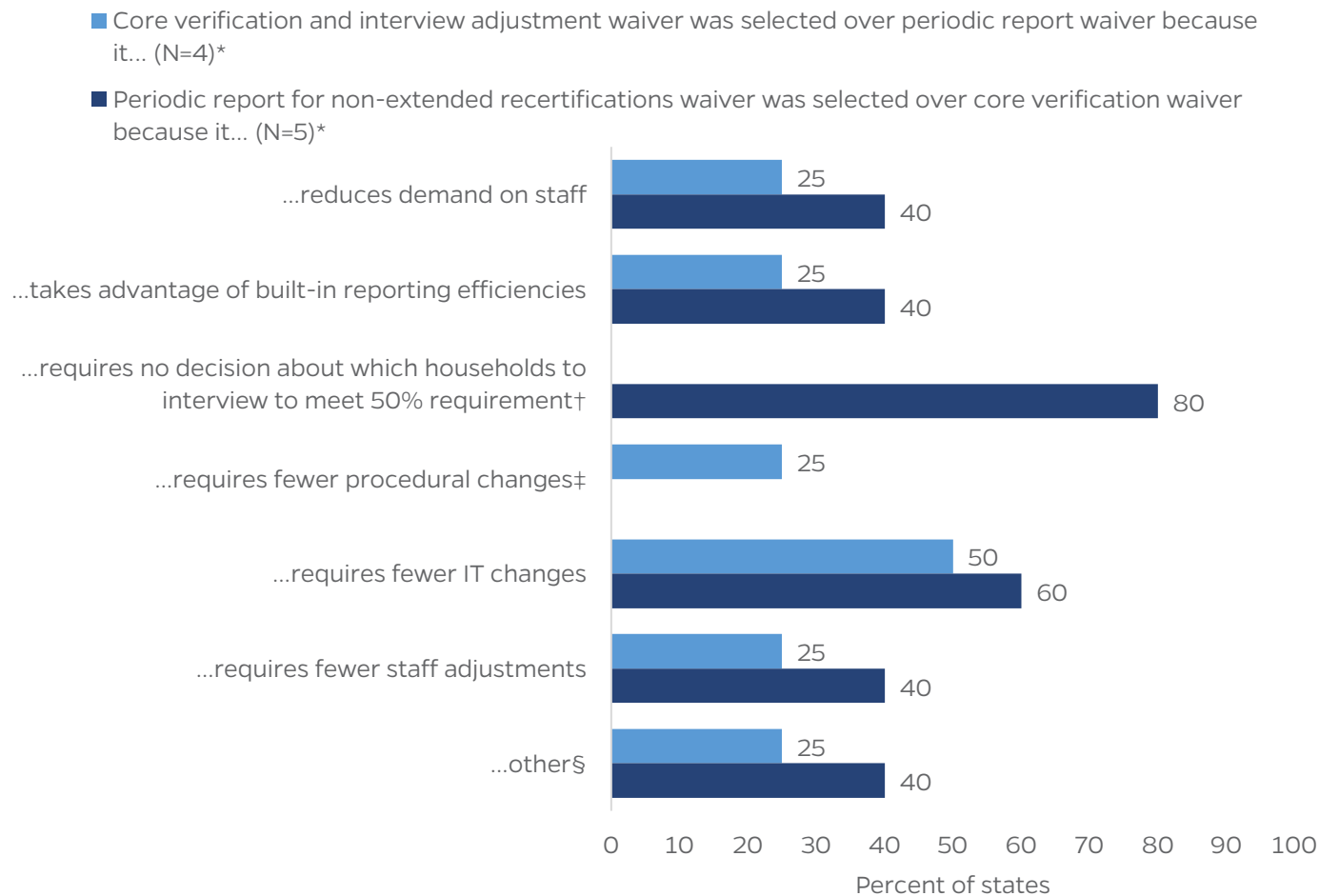
† This option was only offered to states selecting the periodic report flexibility for non-recertification cases waiver.

‡ This option was only offered to states selecting the core verification and interview adjustment waiver.

§ One state selected the core verification and interview adjustment waiver because of an increase in recertifications.

Exhibit 1.2.3 shows that most states (80%) that selected the periodic reporting rules waiver chose it instead of the core verification waiver because it did not require a decision to be made about which households to interview to meet the 50% requirement. This requirement may also explain why some states that initially chose the core verification waiver ultimately replaced it with the periodic reporting rules waiver when it was offered 10 days later. Other states reported operational efficiencies associated with the periodic reporting waiver, such as requiring fewer IT changes (60%), fewer staff adjustments, (40%), reduced demands on staff (40%), and making use of built-in reporting efficiencies (40%). These data, combined with qualitative responses provided, indicate that some states had existing efficiencies and automation built into their periodic reporting processes that facilitated use of this flexibility. Of states that selected the core verification waiver over the periodic report waiver, reasons for this decision varied widely; however, the most common reason was that it required fewer changes to IT systems (50%).

EXHIBIT 1.2.3. Reasons for Selecting the Core Verification and Interview Adjustment Waiver Compared to the Periodic Report for Non-Extended Recertifications Waiver



*States missing responses not included in the denominator (n=2 for core verification and interview adjustment and n=2 for periodic report flexibility for non-extended recertification cases).

†This option was only offered to states that selected the periodic report flexibility for non-recertification cases waiver.

‡This option was only offered to states selecting the core verification and interview adjustments waiver.

§Other responses included (1) choosing core verification over periodic report waiver because the state does not do periodic reporting; (2) choosing periodic report over core verification waiver because it allowed leveraging optical character recognition scanning technology; or (3) requesting both waivers and FNS selected periodic report waiver.

Congressional Action to Provide Broader, Time-Limited Flexibility in Waiver Usage

As part of the Continuing Appropriations Act, 2021 and Other Extensions Act, a broad Continuing Resolution that continued FY 2021 appropriations and renewed expiring programs, Congress provided authority for states to extend certification periods, adjust periodic reports, and waive interview requirements without FNS approval prior to implementation. The bill was signed into law on October 1, 2020 and specifically permitted states to select and customize waiver requests within the following parameters:

Extension of certification periods and adjustment of periodic reports: Allowed states to extend certification periods for not more than six months for some or all households whose certification periods were set to expire or whose periodic reports were due on or before June 30, 2021.

Use of periodic reporting rules in lieu of recertification: Allowed states to use periodic reporting rules to satisfy the recertification requirements for some or all households due to recertify, including those extended in the spring, on or before December 2021.

Waiver of interview requirements: Allowed states to waive interviews for new and recertifying households, waive face-to-face interview requirements, and waive expedited service interviews through June 2021.

Unlike prior waivers offered by FNS, the flexibility within the Congressionally authorized waiver language afforded states discretion to determine who to apply the waivers to and for how long. For example, states opting to extend certification periods and adjust periodic reports could decide which months to use this waiver, whether to apply it to all households or a subset of the affected SNAP caseload, and whether to apply it consistently to all households receiving extensions or to vary the length of extensions.

As of the date of publication of this report, many states continue to operate one or multiple of these waiver options and use of the waivers has changed over time.⁹ However, because the survey used for this report was administered in December-January 2021, data are limited to this timeframe. Additional data and perspectives on state utilization and reflections on waivers authorized through the Continuing Resolution will be assessed further in ensuing focus group discussions with states.

⁹ An up-to-date list of adjustments taken by each state can be found on FNS' website: <https://www.fns.usda.gov/snap/cr-state-options>

Selection of Waivers Under the Continuing Resolution

Congressional action allowed states to use more flexible versions of the extension of certification periods, adjustment of periodic reports, and waiver of interview requirements. This policy effectively reversed the prior trend toward restricting waiver access and gave states broader autonomy to determine which waivers were needed and how to apply these

“This flexibility will need to go on beyond the current period allowed under the [Continuing Resolution] as it is anticipated that SNAP applications and caseloads will not experience a slowdown until there is more stable and prolonged economic recovery.”

-State Survey Respondent

waivers. **Exhibit 1.2.4** shows that this flexibility resulted in a large increase in the number of states taking waivers. At the time of the survey, most states (65%) had already selected the waiver of interview requirements and several planned to select the waiver in the future, if needed (9%). The waiver to extend certification periods and periodic reports had been selected by nearly half (49%) of states, and several others planned to select the waiver if

needed in the future (12%). The majority of states (79%) did not intend to use the periodic reporting in lieu of recertifications waiver. These data indicate that the need for flexibility in managing interviews, recertifications, and periodic reports held steady beyond the summer and into the fall and winter months of the pandemic.

EXHIBIT 1.2.4. Selection of Waivers Under the Continuing Resolution

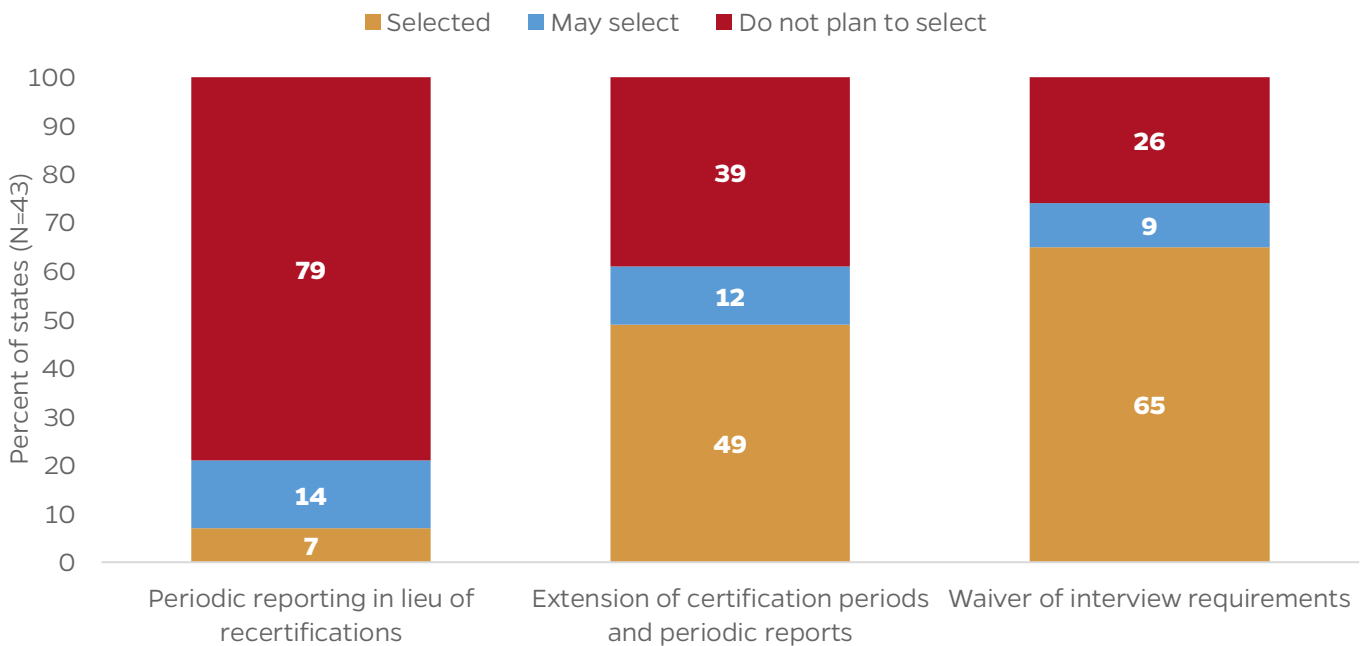


Exhibit 1.2.5 shows that state implementation of waivers selected under the Continuing Resolution has varied. Nearly half of states choosing to extend certification periods or adjust periodic reports (43%) chose to do so for all households due for recertification for a standard amount of time (Exhibit 1.2.5), consistent with how most states would have preferred to apply the initial blanket waiver offered in March. Most other states chose to extend certification periods and/or periodic reports for some households (24%), often opting to do so if the household had not previously been extended in the spring. States that selected to use the interview adjustment waiver generally followed a more uniform approach in applying the waiver, with most (82%) reporting using the waiver for all households (Exhibit 1.2.6). However, some states chose to selectively waive interviews on a county-by-county basis (11%) or chose to only interview households reporting questionable or incomplete Information (7%) or a change in income (4%).

EXHIBIT 1.2.5. Application of the Extension of Certification Periods and Adjustment of Periodic Reports Waivers to Caseloads (N=21)

| How state is applying waiver to caseload | n (%) |
|---|---------|
| Extending for all households for a standard amount of time | 9 (43%) |
| Extending for a subset of households for a standard amount of time | 5 (24%) |
| Extending for all households but varying the length of time by case | 1 (5%) |
| Extending for a subset of households but varying the length of time by case | 1 (5%) |
| Other* | 5 (24%) |

*Other states are applying this waiver to their caseload by (1) extending certification periods for all households except those previously extended in the spring and waiving periodic reports for all households; (2) waiving the periodic report for all households and extending the certification periods for a subset of households; (3) extending recertifications that had not been extended in the spring by 6 months and stopping periodic reports for all households; (4) using periodic reports as a means to recertify SNAP cases beginning in April 2021; or (5) attempting to complete a recertification or periodic report and extending by 6 months if unable to complete.

EXHIBIT 1.2.6. Application of the Waiver of Interview Requirements to Caseloads (N=28)

| How state is applying waiver to caseload | n (%) |
|---|----------|
| Using waiver for all households | 23 (82%) |
| Using waiver for counties that need it | 3 (11%) |
| Only interviewing households with missing or incomplete information | 2 (7%) |
| Using waiver for all households that do not report a change in income | 1 (4%) |
| Other* | 3 (11%) |

*Other states are (1) waiving interviews for recertifications only; (2) using the waiver if the application/recertification was complete with no questionable information reported; or (3) waiving interviews except for some households (ABAWDs, students, no income with expenses).

Characteristics of states selecting extension of certification and interview adjustment waivers are shown in **Exhibit 1.2.7**. Compared to states not selecting these waivers, states selecting waivers tended to be larger and used legacy (versus modernized) IT systems.

EXHIBIT 1.2.7. Characteristics of States Selecting Waivers Under the Continuing Resolution

| State characteristic | Extension of certifications and adjustment of periodic reports | | Waiver of interview requirements | |
|---|--|-----------------------|----------------------------------|-----------------------|
| | Selected (N=21) | Did not select (N=15) | Selected (N=28) | Did not select (N=11) |
| Population, median (IQR) ^a | 5.79 (3.58-7.40) | 2.91 (1.35-6.71) | 5.90 (3.75-9.57) | 1.91 (0.76-5.56) |
| Low staffing capacity, ^b n (%) | 7 (33%) | 3 (20%) | 11 (39%) | 1 (9%) |
| Increase in SNAP applications, ^b n (%) | 12 (57%) | 5 (33%) | 16 (57%) | 2 (18%) |
| Increase in applications for other programs processed by SNAP, ^b n (%) | 7 (33%) | 3 (20%) | 10 (36%) | 1 (9%) |
| Legacy IT system, n (%) | 13 (62%) | 4 (27%) | 15 (54%) | 4 (36%) |
| Percent change in caseload, ^c median (IQR) | 14.4 (7.9-18.2) | 1.1 (-1.6-10.9) | 12.9 (5.7-18.3) | 1.8 (-2.3-12.6) |

^a In millions, data from ACS 2019 1-year estimates

^b Reported in this survey in July or August

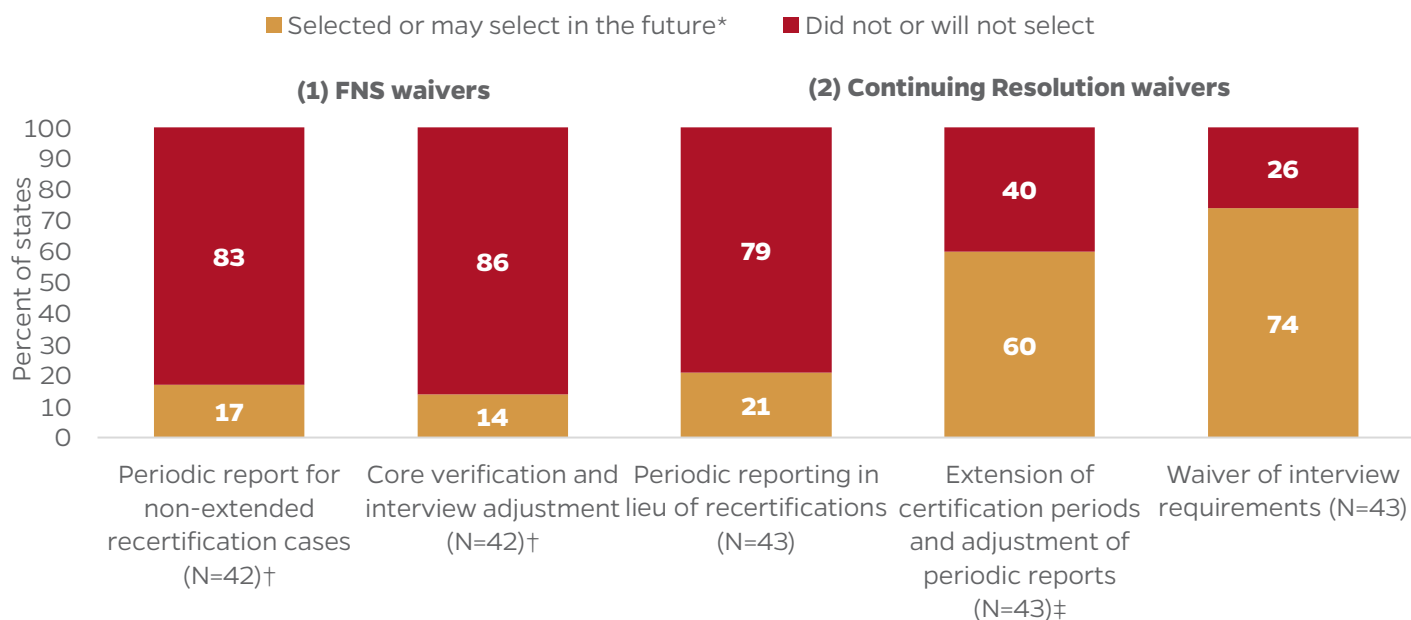
^c Caseload % change from September 2019 to September 2020

Comparison of Extension of Certification Periods and Adjustment of Periodic Reports and Waiver of Interview Requirements Offered by FNS and through Continuing Resolution

As shown in **Exhibit 1.2.8**, the more flexible waivers offered through the Continuing Resolution, which allowed states to use the same waivers as initially offered in March without requiring prior approval from the Secretary of Agriculture, were utilized by significantly more states than the more limited waivers offered by FNS in the fall. At the time of this survey, only 14% of states had selected the core verification and interview adjustment waiver offered by FNS, while 74% states had selected, or stated they may select in the future, the interview adjustment waiver as offered in the Continuing Resolution. Similarly, only 17% of states had used the periodic report flexibility for non-recertification cases waiver offered by FNS, while 60% of states had selected, or stated they may select in the future, the extension of certification periods and periodic report waiver as offered through the Continuing Resolution. Fewer states

(21%) had selected or stated that they may select the periodic reporting in lieu of recertification waiver as offered through the Continuing Resolution. These findings suggest that states were more likely to select waivers that provided them with more flexibility in applying these program modifications to their caseloads.

EXHIBIT 1.2.8. Selection of Certification and Interview Waivers Offered: (1) by FNS in September 2020 and (2) through the Continuing Resolution in October 2020



*Language “may select in the future” only relevant for Continuing Resolution waivers as states were still able to select these waivers past the time of the survey.

†States missing responses not included in the denominator (n=1 for FNS waivers).

‡Percentages for extension of certification periods and adjustment of periodic reports does not match Exhibit 1.2.4. due to rounding.

Note: Up-to-date information regarding waiver selection through the Continuing Resolution is available on FNS’ website.¹⁰

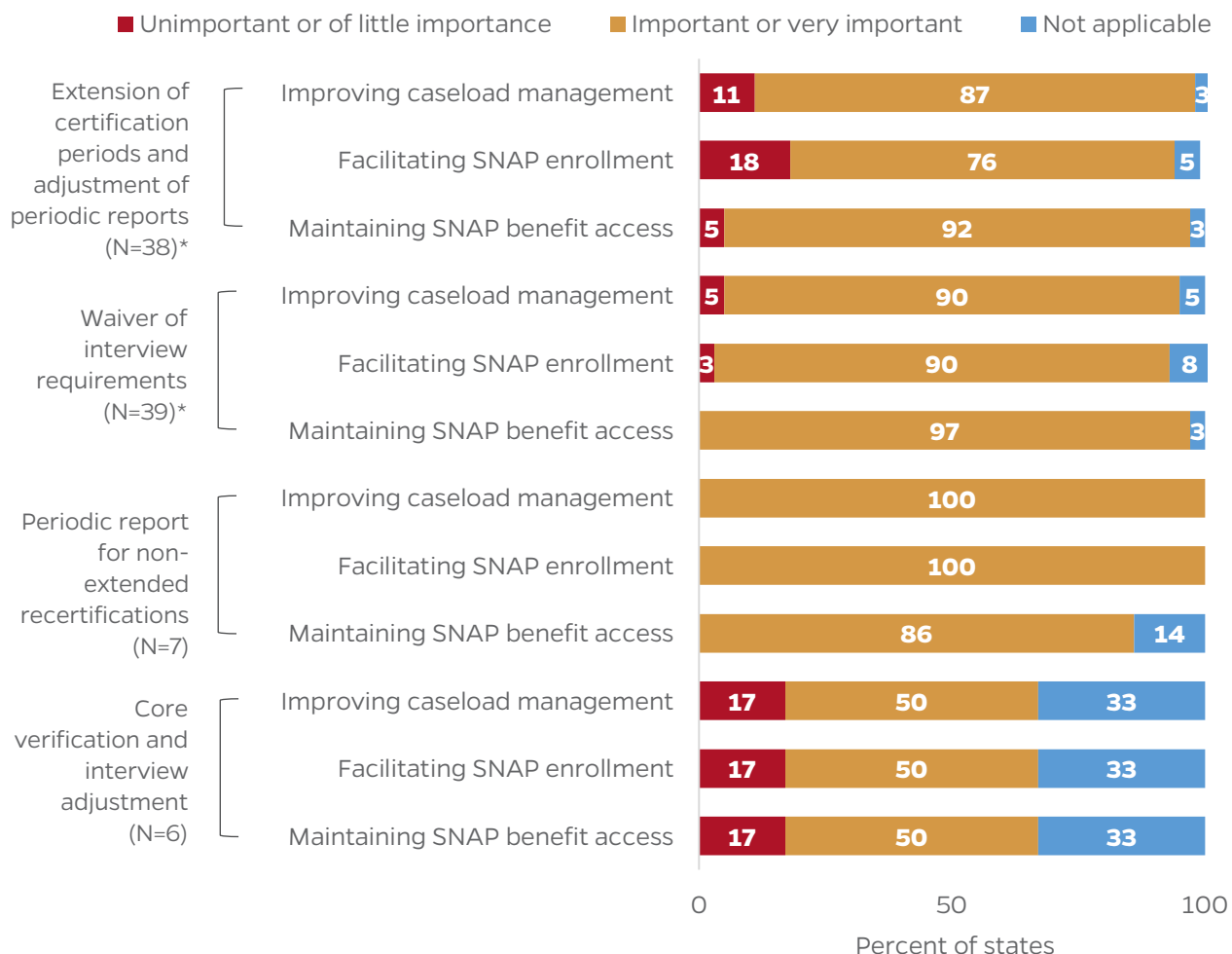
SECTION 1.3. IMPACT OF EXTENSION OF CERTIFICATION PERIODS, ADJUSTMENT OF PERIODIC REPORTS, AND WAIVER OF INTERVIEW REQUIREMENTS ON STATE ADMINISTRATIVE PROCEDURES AND SNAP BENEFICIARIES

The certification and interview adjustment waivers were critical for managing caseloads, removing barriers to enrollment for new SNAP applicants, and maintaining benefit access for current SNAP beneficiaries (Exhibit 1.3.1). There was near universal consensus among states

¹⁰ An up-to-date list of adjustments taken by each state can be found on FNS’ website: <https://www.fns.usda.gov/snap/cr-state-options>

that interview adjustments were important or very important in all three areas of program administration. Similar consensus was shared by states on the importance of extensions to certification periods and periodic reports for maintaining SNAP benefit access. A significant majority agreed extensions were important or very important for improving caseload management and facilitating SNAP enrollment. Of the two short-term, narrower FNS flexibilities offered in August for the month of September that a limited number of states utilized, states shared similar positive feedback on the importance of using periodic reporting rules for non-extended recertifications but more mixed feedback on the core verification and interview adjustment waiver. This response is consistent with more recent trends in waiver utilization after the date this survey was administered, with a small but significant number of states continuing to use periodic reporting rules to recertify households through Congressional authority in the Continuing Resolution.

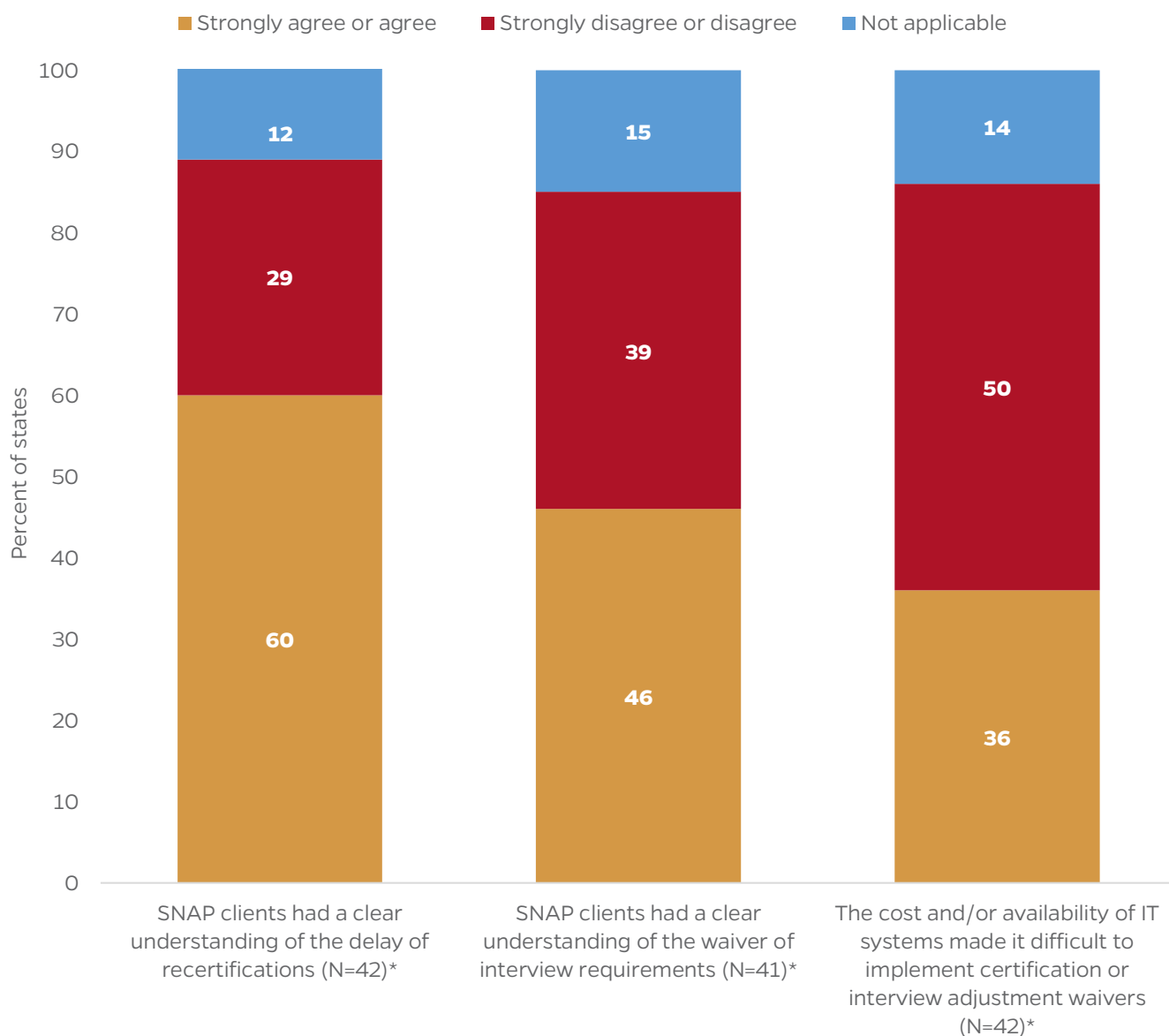
EXHIBIT 1.3.1. Perceived Importance of the Waivers to Extend Certification Periods, Adjust Periodic Reports, and Waive Interview Requirements for Improving Caseload Management, Facilitating SNAP Enrollment, and Maintaining SNAP Benefit Access During the Pandemic



Note: Not all bars sum 100% due to rounding.

While states consistently expressed the value of these waivers, some states reported challenges in implementing waivers or difficulties in communicating program changes to clients. **Exhibit 1.3.2** shows that 35% of state respondents felt the cost and availability of IT systems made it difficult to implement certification or interview adjustment waivers. Other states believed that SNAP clients did not have a clear understanding of the waiver of interviews (38%) or extension of certifications (28%).

EXHIBIT 1.3.2. Agreement with Statements Regarding Challenges to Implementing the Extension of Certification Periods Waiver and Waiver of Interview Requirements

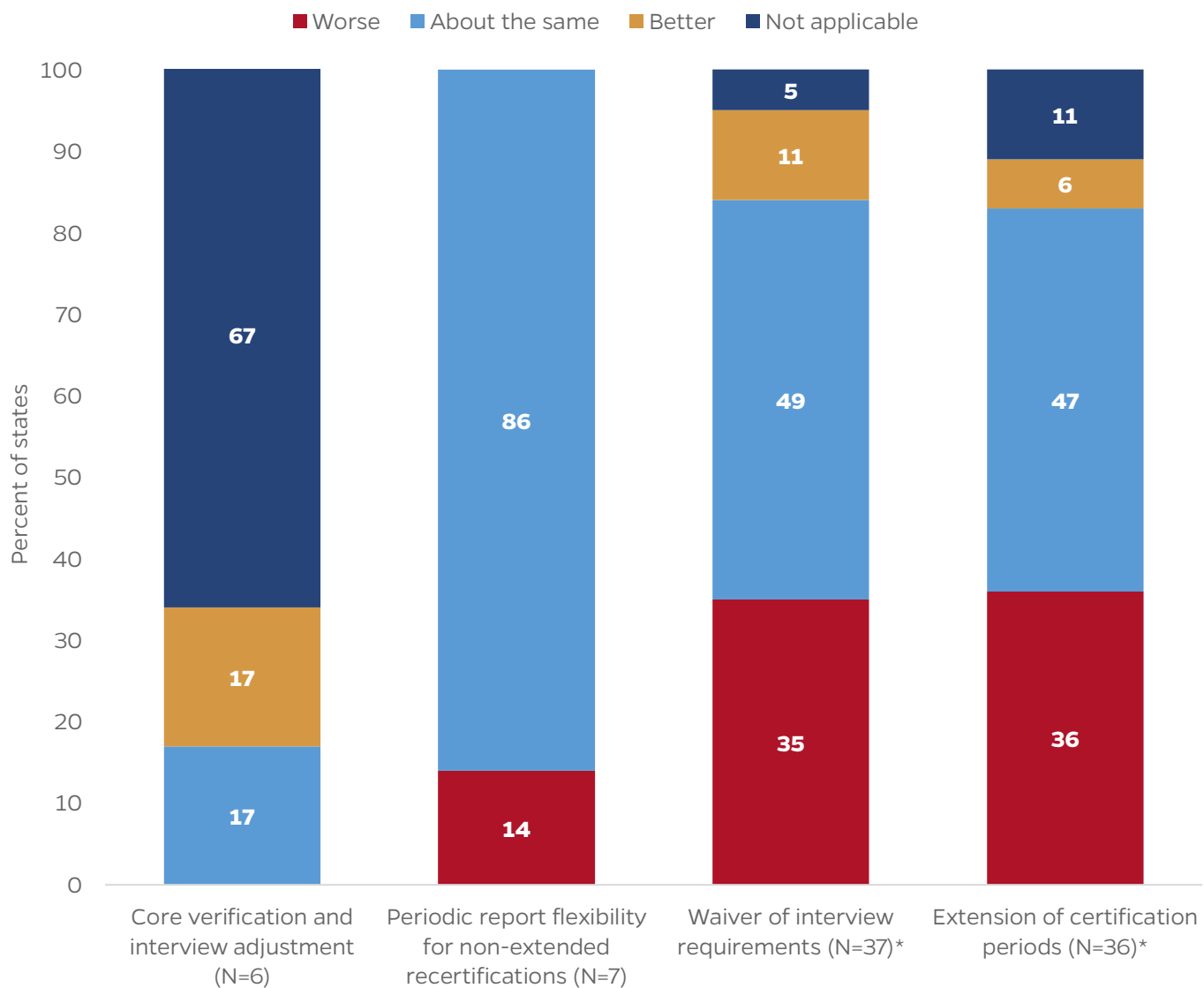


*States missing responses not included in denominator (n=1 for delay of recertifications, n=2 for waiver of interviews, and n=1 for cost and availability of IT systems).

Note: Not all bars sum to 100% due to rounding.

Exhibit 1.3.3 considers state perspectives on how interview and certification waivers affected payment accuracy. For each type of waiver selected, the greatest number of states indicated there was no significant change in payment accuracy; however, there was substantial variation in state responses. Approximately one-third of states perceived that interview adjustments and certification extensions worsened payment accuracy whereas close to half of states reported no impact and a smaller share felt the waivers resulted in better payment accuracy. Although a small sample, a significant majority (86%) of states utilizing the periodic reporting in lieu of full recertification waiver reported no change in payment accuracy.

EXHIBIT 1.3.3. Impact of Extension of Certification Periods Waiver and Waiver of Interview Requirements on Payment Accuracy



*States missing responses not included in denominator (n=2 for waiver of interview requirements and n=2 for extension of certification periods).

Exhibit 1.3.4 considers whether and how the timing of FNS guidance impacted state implementation of certification and interview waivers. This question was asked of state respondents given that FNS guidance and waiver responses over the summer of 2020 ran close to, or in some cases were delayed beyond implementation dates. More than three out of four state respondents reported having to change standard procedures as a result of the timing of waiver guidance, including having to delay notifying clients of recertification, periodic reporting, or interview deadlines (33%), retracting notification of upcoming deadlines after FNS approval of waiver extensions (33%), and having to apply normal rules to some clients in a given month while providing waiver flexibility to others after notification and implementation of a waiver approval (42%). State responses reinforce the importance of timely guidance for states to implement waivers consistently and with fidelity and highlight the process changes needed to support waiver implementation.

EXHIBIT 1.3.4. Impact of the Timing of FNS Guidance on State Implementation of the Extension of Certification Periods and Waiver of Interview Requirements (N=39)*

| Change to standard operating procedures | n (%) |
|---|--------------|
| Delayed notifying clients of recertification, periodic reporting, or interview deadlines | 14 (36%) |
| Retracted notification of upcoming deadlines after FNS approval | 14 (36%) |
| Within the month, completed a subset of activities, then extended others after FNS approval | 18 (46%) |
| No changes to standard procedures | 9 (23%) |
| Other† | 3 (8%) |

*Sample reflects only states that extended certification periods or waived interview requirements at any time. States missing responses not included in the denominator (n=2).

†Other responses included that (1) guidance was often late, leaving states with little ability to plan a coordinated response; (2) the waiver of interview requirements required extensive changes to standard operating procedures causing significant confusion among eligibility staff; or (3) applications were processed without interviews, but notices had already been sent to customers.

SECTION 1.4. KEY FINDINGS

Extension of Certification Periods and Interview Adjustments

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

Most states selected the initial blanket waivers offered in March 2020 to extend certification periods, adjust periodic reports, and waive interview requirements. At the time these initial waivers were offered, many states were dealing with office closures, transitions to telework, and a massive increase in SNAP applications as millions of individuals lost their jobs due to the pandemic. States selected certification and interview waivers to address low staffing capacity, increased SNAP applications, increased applications for programs dually processed by SNAP staff (e.g., Medicaid), and concerns about the health and safety of clients and staff. These waivers were almost ubiquitously perceived as important for managing caseloads, facilitating SNAP enrollment, and maintaining benefit access for current SNAP beneficiaries early in the pandemic. Many states continued to extend certifications, adjust periodic reports, and/or waive interviews using greater flexibility offered under the Continuing Resolution authorized in the fall of 2020. Exploratory analyses of survey data suggest that these waivers have been particularly important for larger states and states with legacy IT systems that are less nimble to adapt to program changes, as well as for states experiencing persistent increases in applications for SNAP, increases in applications for dually processed programs, and decreased staffing capacity.

“The flexibilities allowed by FNS through the pandemic were overall successful, allowing [STATE] to process the significant increase of new applications timely and provide stability to SNAP households during the height of the pandemic.”

-State Survey Respondent

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

The requirement that states selecting the initial blanket waiver must extend certification periods and adjust periodic reporting dates for all affected households by six months resulted in caseload imbalances that pushed out state workloads six months down the line on top of already heightened volume. Over half of states that participated in the survey had either requested or would have preferred a method of

extending certification periods that differed from the guidance provided by FNS in March, and most states that did not request the July or August extension of certification waivers acted out of concern that this modification would create unmanageable work when recertifications became due. States varied significantly in their preferences for an alternative option to the one offered by FNS, indicating that there is no one-size-fits-all solution. The workload challenges associated with extending certification periods appears to have been a contributing factor to the sharper decline in utilization of this waiver over time relative to interview adjustments.

“There isn’t always a one size fits all approach – the ability to align with other programs would be helpful. The state is concerned about workload “bubbles” being created given some of the current timelines – which will have long-standing implications. The ability to support additional flexibility for specific circumstances, while supporting public health needs would be a much more [amenable] policy during emergencies.”

-State Survey Respondent

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

“Sometimes the timing of the availability of some flexibilities offered were difficult to implement due to the amount of time they would take to program and communicate.

-State Survey Respondent

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 waiver options authorized in the Continuing Appropriations 2021 and Other Extensions Act 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.

Despite many states operating interview waivers throughout the COVID-19 pandemic, most continued to conduct interviews with clients in more targeted ways, such as using interviews at the request of clients, to resolve discrepancies in client information, and based on county capacity, among other reasons. Most states adapted to primarily conducting interviews telephonically, with a small number of states making video conferencing available and some states continuing to offer face-to-face interviews. Many states believed that the interview waiver either had no impact on or improved payment accuracy. Further research is needed to understand challenges and possibilities for extending interview flexibilities beyond the public health emergency.

SECTION 2. APPLICATION SUPPORT AND CASE RESOLUTION

Introduction

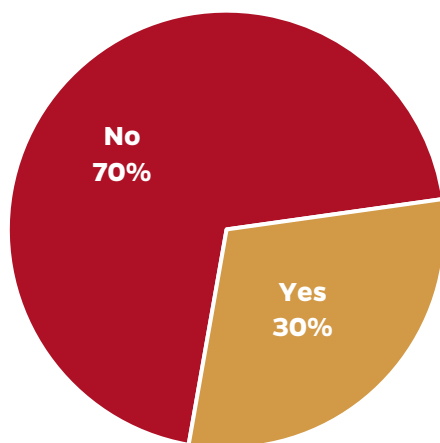
This section analyzes state waivers and business process changes in response to the COVID-19 pandemic related to application support and case resolution. The section is organized by:

- Use of telephonic signatures for completing SNAP applications prior to and during the pandemic
- Use of the temporary suspension of overpayment claims waiver
- Use of the waiver to adjust fair hearings for customer appeals
- Adaptations to staffing models and technology to support core case functions
- State assessments of the impact of application support and case resolution flexibilities on mitigating COVID-19 impacts

SECTION 2.1. TELEPHONIC SIGNATURES

Use of Telephonic Signatures Prior to the Pandemic

EXHIBIT 2.1.1. Use of Audio Recordings for Telephonic Signatures Prior to the Pandemic (N=43)



SNAP applications and recertifications must be signed by an adult member of the household or authorized representative to be considered complete. Federal rules provide states certain flexibilities in acceptable forms of signature, including written, electronic, telephonic, and gestured signatures. States that choose to accept a telephonic signature are required to make an audio recording of a household's verbal assent and a summary of the information to which the household assents. To implement this policy, participating states must have telephonic signature systems that link the recorded audio file to a household's case record and can be easily retrieved. The audio recording

technology requirement can pose barriers for states and local agencies lacking the technology to make telephonic signatures accessible to households. As shown in **Exhibit 2.1.1**, only 30% of states in our sample collected audio recordings for telephonic signatures prior to the pandemic.

Selection of the Waiver of Audio Recordings for Telephonic Signatures

As the COVID-19 pandemic shifted the overwhelming majority of SNAP case processing services to a remote environment, many states that did not have existing systems in place to comply with telephonic signature requirements needed alternative options to offer virtual application support. Using broad authority granted in the Families First Coronavirus Response Act, USDA issued guidance that permitted states to include written documentation in case files that a client verbally attested to information provided on an application rather than mandate an audio recording be made to accept telephonic signatures. The waiver was offered to states in March through May of 2020, and starting in June, extensions were approved by FNS monthly. As shown in **Exhibit 2.1.2**, 42% of all states (N=43) indicated that they selected the waiver of audio recordings during at least one month from March through December 2020. Of the states that did not use audio recordings for telephonic signatures prior to the pandemic (N=30), 47% of states selected this waiver during at least one month from March through December 2020.

EXHIBIT 2.1.2. Selection of the Waiver of Audio Recordings for Telephonic Signatures at Any Point March-December 2020

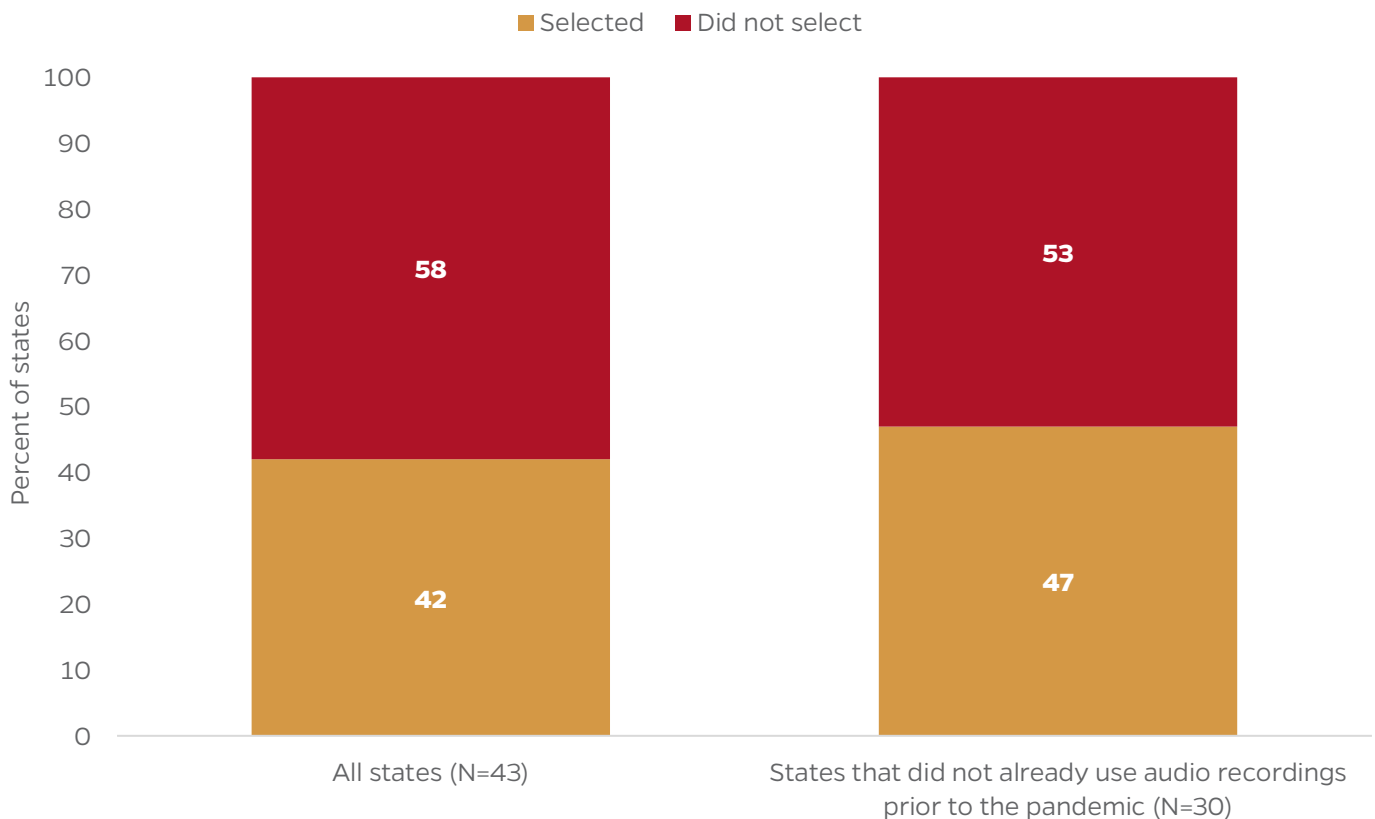
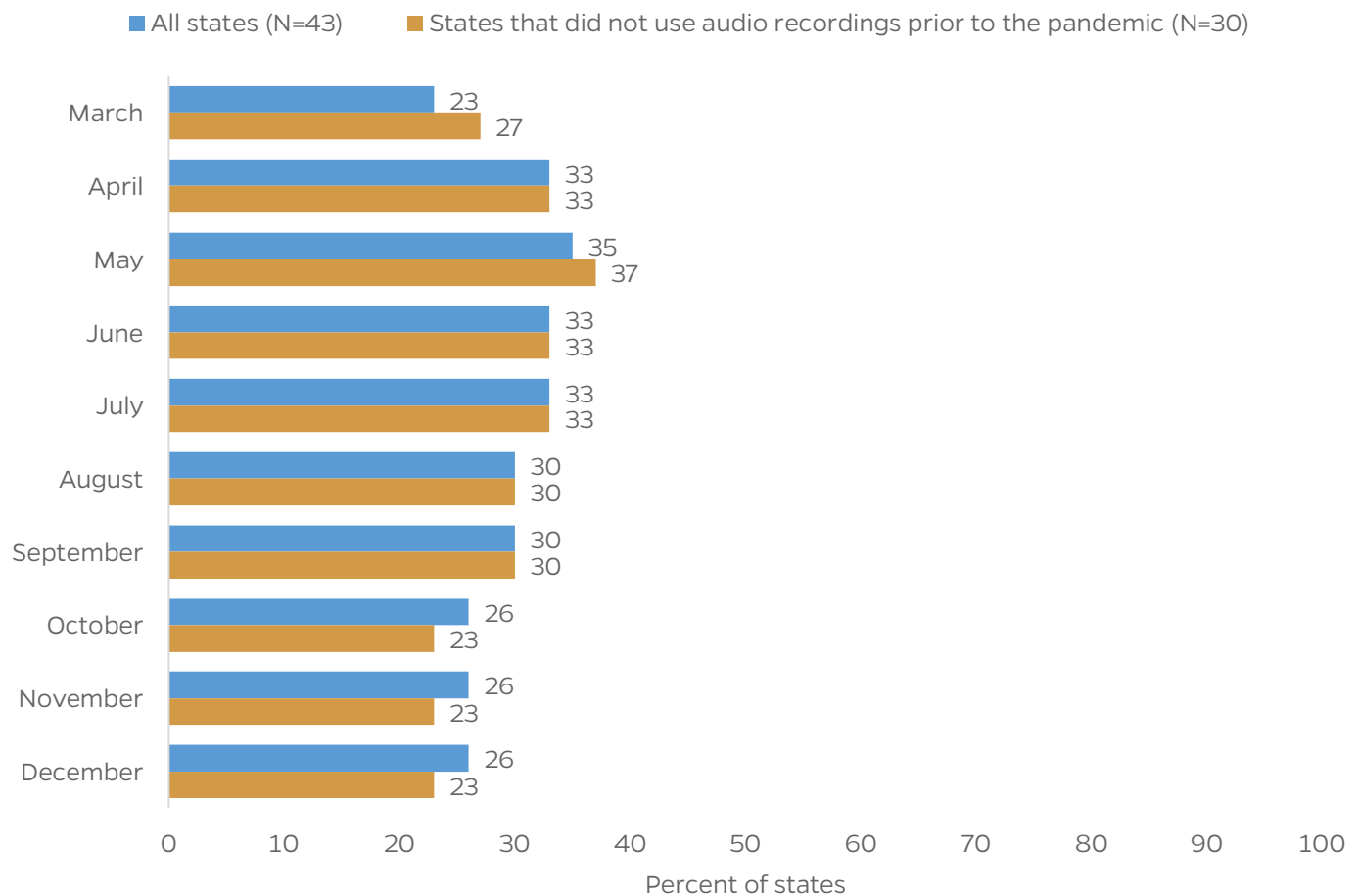


Exhibit 2.1.3 breaks down usage of the waiver of audio recordings by month for all states (N=43) and for states that did not indicate using audio recordings prior to the pandemic (N=30). A small subset of states that did not use audio recordings prior to the pandemic have used the waiver in each month through December 2020 (13%) (data not shown). Of the states that did not use audio recordings prior to the pandemic, month-to-month usage remained stable over time, ranging from as high as 37% of states in May to as low as 23% towards the end of the year. Although utilization peaked in May and declined slightly during summer and fall, 26% of all states and 23% of states that did not use audio recordings prior to the pandemic were still utilizing the waiver in December, indicating ongoing need for flexibility in remote application support. In open-ended responses, some states that were using audio recordings prior to the pandemic reported that this option was not available in all counties or tribal areas, and not all staff had the capacity to use audio recording technology while teleworking. Of the 13 states that did use audio recordings prior to the pandemic, four selected the waiver of audio recordings for telephonic signatures during the pandemic, most likely to enable collection of telephonic signatures statewide and during office closures (data not shown).

EXHIBIT 2.1.3. Utilization of the Waiver of Audio Recordings for Telephonic Signatures in March-December 2020, By Month



In some states, use of this waiver during the pandemic motivated long-term adoption of telephonic signatures. One state reported discontinuing use of the waiver and implementing the technology required to collect audio recordings in compliance with USDA regulations. In open-ended responses, some states reported that they would collect audio recordings for telephonic signatures in the future as part of their state plans. Others encouraged FNS to relax the requirements for costly telephonic signature systems based on success of the waiver during the pandemic. For these states, this waiver was perceived as a low-cost option to implement telephonic signatures long-term, while reducing inequities in access to technology across county and tribal areas and supporting telework.

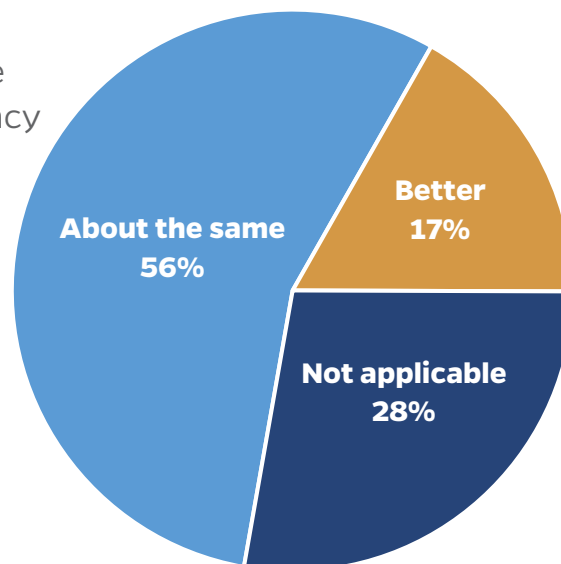
“It would be beneficial for FNS to review the feedback from states on this success and potential[ly] make this an easier option without having to purchase a telephonic signature system, which [is] costly.”

-State Survey Respondent

As shown in **Exhibit 2.1.4**, most states found that the waiver of audio recordings for telephonic signatures kept their payment accuracy about the same (56%). Some states (17%) reported that the waiver of audio recordings for telephonic signatures positively impacted their payment accuracy. Still, many states reported that this waiver did not apply to their payment accuracy (28%).

EXHIBIT 2.1.4. Impact of Waiver of Audio Recordings for Telephonic Signatures on Payment Accuracy (N=18)*

When implementing the waiver, payment accuracy was...



*Includes states that selected this waiver at any time.
Note: Pie chart does not sum to 100% due to rounding.

SECTION 2.2. TEMPORARY SUSPENSION OF OVERPAYMENT CLAIMS COLLECTION

When SNAP beneficiaries are issued more benefits than they are eligible to receive, corrective action is taken by the state by establishing an overpayment claim. This can occur due to an intentional program violation committed by a SNAP recipient, an inadvertent household error, or an agency error. Rules on calculating the overpayment claim amount differ based on the type of claim. Depending on the beneficiaries' program status at the time of the claim, repayments may be automatically deducted from future benefits, paid as a lump sum, or paid as monthly installments. Claims become delinquent if not paid by the due date or if satisfactory payment arrangement has not been made.

Because of the economic toll and increasing need for nutrition assistance during the pandemic, USDA issued a blanket waiver in April 2020 for states to temporarily suspend overpayment claims collection effective March 1, 2020. This waiver allowed SNAP beneficiaries subject to overpayments to continue to receive their full benefit amount temporarily, by allowing state agencies to:

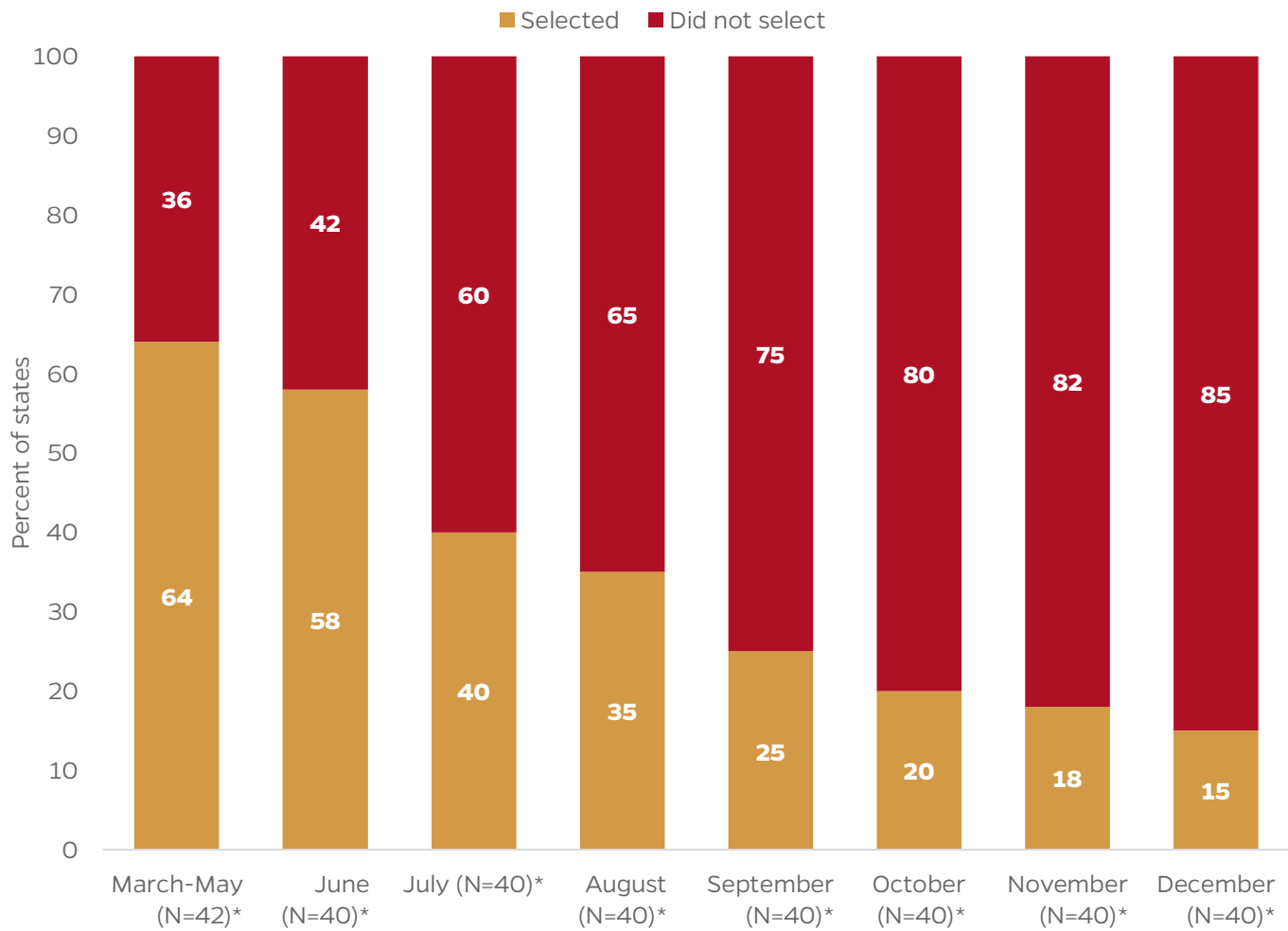
- Extend the time frame for establishing or disposing of new claims;
- Not collect active recoupment of SNAP overpayments;
- Delay collection on newly established overpayments; and
- Not consider payments delayed due to this suspension to be delinquent.

FNS approved extensions of the waiver on a monthly basis starting in June 2020.

Selection of the Waiver to Temporarily Suspend Overpayment Claims Collection

As shown in **Exhibit 2.2.1**, nearly two-thirds (64%) of states selected the initial blanket waiver to temporarily suspend collection of claims in March, April, and May. Selection of this waiver declined over time, with 58% of states selecting the waiver in June, and 15% selecting the waiver in December. The data suggest that flexibilities on collection of claims was particularly important early in the pandemic, during a period in which many states were experiencing widespread lockdowns, business closures, and a surge in unemployment claims. In open-ended responses, states reported various reasons for not selecting this waiver. For example, two states reported technological hurdles to implementing the waiver on the timeline required, and one state believed the evaluation criteria required for approval by FNS was administratively burdensome.

EXHIBIT 2.2.1. Utilization of the Waiver to Temporarily Suspend Overpayment Claims Collection in March-December 2020, By Month



*States missing responses not included in denominator (n=1 for March, April, May and n=3 for June-December).

As shown in **Exhibit 2.2.2**, various approaches were taken to defer collection of claims among states utilizing this waiver. Most (52%) deferred collection of overpayments for all new and existing claims, but some states deferred collection only for new claims (9%) or on a case-by-case basis (17%; for example, at the request of the client). Of the states that continued to use the waiver to temporarily suspend overpayment claims collection from September through December (N=10), 56% indicated that they deferred collection for all new and existing claims, and 22% indicated that they deferred collection for all new claims (data not shown). One state deferred all existing claims that were turned over to the Treasury Offset Program. Another state applied payments to debts but did not consider clients not making a payment to be delinquent or subject to other collection activities.

EXHIBIT 2.2.2. Approaches to Adjusting Overpayment Claims Collection (N=23)*

| Approach | n (%) |
|--|--------------|
| We deferred collection for all new and existing claims | 12 (52%) |
| We deferred collection of claims on a case-by-case basis | 4 (17%) |
| We deferred collection for all new claims | 2 (9%) |
| Other† | 5 (22%) |

*States missing responses not included in denominator (n=5).

†Other approaches included (1) continuing to calculate claims but not considering any debts to become delinquent; (2) not adjusting claims but ceasing treasury offset and referral and collection from March through August; (3) applying payments made to debts but not considering debts to become delinquent; (4) deferring collection of claims on all existing claims that were turned over to the Treasury Offset Program; or (5) changing IT systems to defer referring individuals to the Treasury Offset Program and allowing local staff additional time to establish claims.

SECTION 2.3. FAIR HEARINGS

SNAP beneficiaries have the right to appeal decisions made by the state and to ask for a fair hearing. USDA regulation requires that state agencies conduct hearings, reach a decision, and notify the household within 60 days of receipt of a request. States accepting oral expressions to withdraw hearing requests must respond with written notice to the household confirming the withdrawal request within 10 days.

In April 2020, USDA issued a blanket waiver allowing states flexibility in responding to fair hearings requests. This waiver allowed states to:

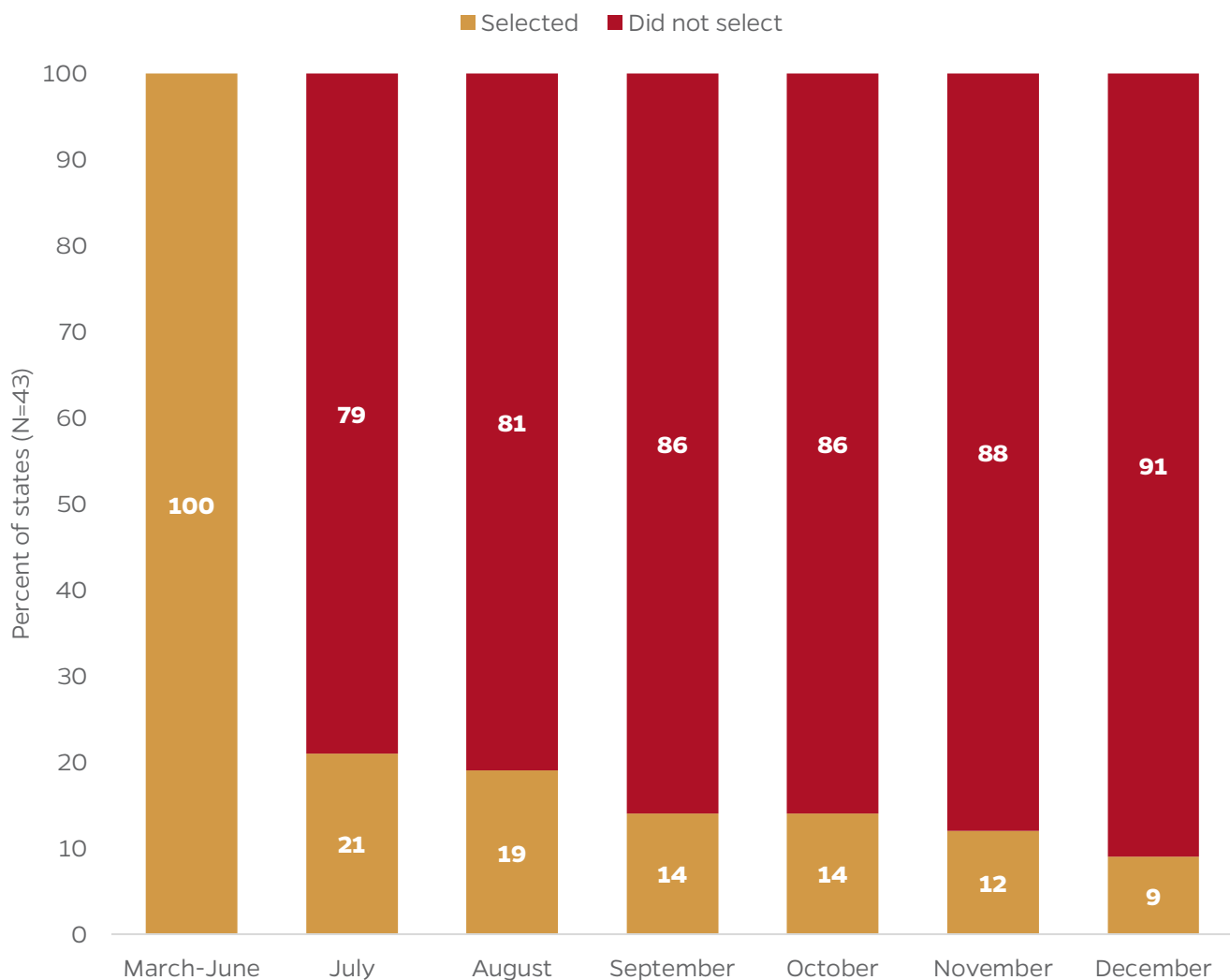
- Extend the fair hearings process up to 120 days from receipt of the request for: (1) fair hearings already in process, and (2) requests received between March 1 and May 31, 2020; and
- Extend the time frame for sending notices confirming oral withdrawal requests up to 30 days from receipt of requests.

While under the waiver, states were encouraged to conduct fair hearings by alternate means, such as telephone or video conference, when possible, to meet the standard required time frames. After the initial blanket waiver expired, FNS continued to approve extensions on a monthly basis beginning in June 2020.

Selection of the Waiver of Fair Hearings

All states (N=43) selected the waiver of fair hearings offered in March-June.¹¹ As shown in Exhibit 2.3.1, use of this waiver dropped off substantially in July and stayed low through December. In open-ended responses, several states commented that they requested and were approved for the waiver early in the pandemic but did not need to adjust fair hearings time frames due to a low number of appeals. Congress' approval of emergency allotments, which allowed states to increase all households to the maximum benefit amount for their household size during the public health emergency, likely contributed to lower rates of appeals during this period.

EXHIBIT 2.3.1. Utilization of the Waiver of Fair Hearings in March-December 2020, By Month



¹¹ All state survey respondents indicated utilizing the blanket waiver option from March-May 2020. FNS National Office reported that only 25 states notified their regional office of utilizing the waiver.

EXHIBIT 2.3.2. Agencies Offering Fair Hearings Via Telephone or Video During the Pandemic (N=41)

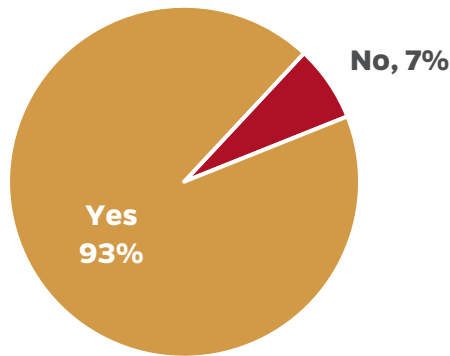


Exhibit 2.3.2 shows that most states offered remote fair hearings, such as telephone or video, during the pandemic. The widespread use of remote hearings combined with low utilization of fair hearings waivers after the first several months of the pandemic indicate that states were mostly effective at rapidly adjusting their fair hearing procedures without the need for additional time or flexibility to manage their hearing processes.

SECTION 2.4. ADAPTATIONS TO STAFFING MODELS AND TECHNOLOGY TO SUPPORT CORE CASE FUNCTIONS

Staffing and technology may have facilitated or inhibited shifts in application processing and communication methods necessitated by the pandemic. Every state differs in their approach and capacity to accept applications remotely and use technology to aid in the processing and verification of cases. Similarly, states differ in their use of staffing to manage core SNAP functions, varying in their use of integrated case workers across SNAP and related programs, use of call centers to support certain case functions, and ability to pool cases and assign them to different workers based on capacity. These factors can influence the need for, and effectiveness of, waiver options made available to states during the pandemic.

Exhibit 2.4.1 documents, across a range of core SNAP processing functions, the technology available to states prior to the pandemic and the new or expanded technology established during the pandemic. The data show that many states already provided online access for households to apply for (88%), submit documents for (81%), and recertify (84%) their SNAP benefits prior to the pandemic. These three online case functions also represented the areas where most states expanded their technology capabilities during the pandemic (16%, 12%, and 12%, respectively). Conversely, less than half of states accepted applications and recertifications telephonically prior to the pandemic (40% and 40%, respectively). Of states that added or expanded technology during the pandemic, most changed the availability of telephonic technology for varying case functions. A smaller share of states had mobile-friendly options for SNAP case functions prior to the pandemic; yet the data show that only a handful of states were successful in expanding or adding new capacity for mobile-friendly solutions during the pandemic. Collectively, these data indicate that while states have made significant progress on developing online services for clients, further efforts are needed to make these services more accessible through mobile-friendly platforms. Similarly,

while progress has been made in applying for and recertifying SNAP benefits online, a smaller share of states have adopted online tools to support case functions such as scheduling interviews, managing claims, submitting periodic reports, and conducting fair hearings. The limited adoption of new technology during the pandemic may reflect longer-term investments needed to advance these solutions. Further context to understand the types of new and enhanced technology that states used during the pandemic, and how this influenced their pandemic response is needed.

EXHIBIT 2.4.1. Options Offered Pre-Pandemic and Added or Expanded During the Pandemic to Support Core Case Functions (N=43)

| Option to support case functions | Available pre-pandemic n (%) | Added n (%) | Expanded n (%) |
|---|-------------------------------------|--------------------|-----------------------|
| Telephone | | | |
| Applications | 17 (40%) | 6 (14%) | 1 (2%) |
| Recertifications | 17 (40%) | 6 (14%) | 0 (0%) |
| Periodic reports | 9 (21%) | 2 (5%) | 0 (0%) |
| Interview scheduling | 29 (67%) | 0 (0%) | 3 (7%) |
| Overpayment claims | 4 (9%) | 0 (0%) | 0 (0%) |
| Fair hearings | 29 (67%) | 3 (7%) | 3 (7%) |
| Online | | | |
| Applications | 38 (88%) | 2 (5%) | 7 (16%) |
| Recertifications | 36 (84%) | 1 (2%) | 5 (12%) |
| Periodic reports | 19 (44%) | 1 (2%) | 1 (2%) |
| Document submission | 35 (81%) | 3 (7%) | 5 (12%) |
| Interview scheduling | 6 (14%) | 2 (5%) | 1 (2%) |
| Overpayment claims | 5 (12%) | 1 (2%) | 0 (0%) |
| Fair hearings | 11 (26%) | 1 (2%) | 0 (0%) |
| Mobile-Friendly | | | |
| Applications | 14 (33%) | 1 (2%) | 2 (5%) |
| Recertifications | 13 (30%) | 1 (2%) | 2 (5%) |
| Periodic reports | 7 (16%) | 1 (2%) | 1 (2%) |
| Document submission | 15 (35%) | 2 (5%) | 3 (7%) |
| Interview scheduling | 1 (2%) | 0 (0%) | (0%) |

In addition to using technology to increase access and improve the client experience, states may be able to more safely and efficiently process cases by adopting machine reading and intelligent scanning tools into their workflow. For example, using such tools to only route periodic reports that indicate a change in circumstances to caseworkers could help focus agency staff's time on the priority cases needing review. As shown in **Exhibit 2.4.2** and **Exhibit 2.4.3**, only 12% of states developed new machine reading or intelligent scanning technology, and this was most often for processing recertifications (n=4). These data suggest that these types of technology investments likely require more time and planning to design and may have been challenging to newly implement during the public health emergency response.

EXHIBIT 2.4.2. Development of New Machine Reading or Intelligent Scanning for Core Case Functions (N=43)

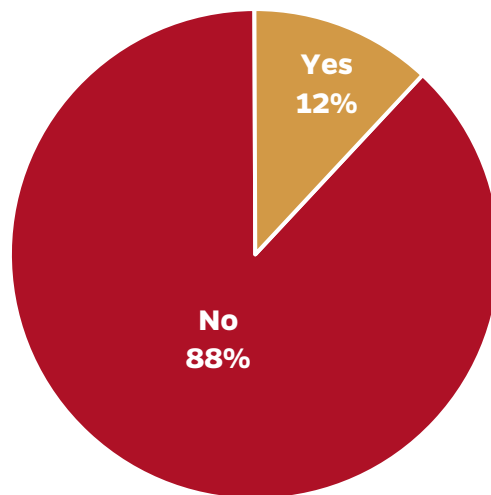


EXHIBIT 2.4.3. Case Functions Utilizing New Machine Reading or Intelligent Scanning (N=43)

| Case function | n (%) |
|------------------|--------|
| Applications | 2 (5%) |
| Periodic reports | 2 (5%) |
| Recertifications | 4 (9%) |

Exhibit 2.4.4 explores whether states made significant staffing adaptations to support the increased demand on application support and case resolution during the public health emergency. Most states (61%) made staffing adaptations to support application processing, most commonly deploying staff from other units within SNAP (44%) or deploying staff from other programs outside of SNAP (42%). In open-ended responses, states in which SNAP is locally administered reported that changes to staffing models varied significantly across county and tribal areas.

EXHIBIT 2.4.4. Staffing Adaptations to Support Application Support and Case Resolution(N=41)*

| Staffing adaptation | n (%) |
|--|----------|
| States that made adaptations | 25 (61%) |
| Deployed staff from other units within SNAP | 18 (44%) |
| Deployed staff from programs outside of SNAP | 17 (42%) |
| Hired eligibility employees or other temporary staff | 3 (7%) |
| Expanded use of non-merit staff | 3 (7%) |
| States that did not make adaptations | 16 (39%) |

*States missing responses not included in denominator (n=2)

SECTION 2.5. IMPACT OF APPLICATION SUPPORT AND CASE RESOLUTION FLEXIBILITIES ON STATE ADMINISTRATIVE PROCEDURES AND SNAP BENEFICIARIES

Exhibit 2.5.1 looks comparatively across the three waiver flexibilities explored in this section — telephonic signatures, overpayment claims, and fair hearings — to assess state perceptions of the impact of each waiver flexibility on SNAP access and operations. Most states selecting the waiver of audio recordings for telephonic signatures believed this waiver was important for managing caseloads (67%), facilitating SNAP enrollment (72%), and maintaining benefit access for current SNAP beneficiaries (67%). The waiver to temporarily suspend overpayment claims was commonly viewed as important for maintaining SNAP benefit access (54%), but less important for caseload management (31% of states viewed this waiver as important). The waiver of fair hearings timelines was viewed as the least important for improving caseload management (31%) and maintaining benefit access (43%).

EXHIBIT 2.5.1. Perceived Importance of Waiver of Audio Recordings for Telephonic Signatures, Waiver to Temporarily Suspend Overpayment Claims Collection, and Waiver of Fair Hearings for Improving Caseload Management, Facilitating SNAP Enrollment and Maintaining SNAP Benefit Access During the Pandemic



*Waiver of audio recordings for telephonic signature bars do not sum to 100% due to rounding.

†States missing responses not included in denominator (n=1).

SECTION 2.6. KEY FINDINGS

Application Support and Case Resolution

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

Prior to the pandemic, USDA allowed states the option to collect application signatures over the phone by setting up a telephonic signature system, which collects an audio recording of the client attesting to the accuracy of the information provided in the SNAP application. The cost of the technology required to collect audio recordings securely can be a barrier for many states; only 30% of states responding to this survey were utilizing this option prior to the pandemic. The waiver of audio recordings for telephonic signatures allowed many more state agencies to collect signatures over the phone by making a note in the case file, rather than providing an audio recording. States consistently viewed this waiver option as important for enrolling households, maintaining benefits, and managing caseloads during the pandemic, including among states that had audio recording technology available but only in certain local agencies. Moreover, no states considered this waiver to have an adverse impact on payment accuracy. Collectively, these data support further consideration for making the telephonic signature waiver a permanent option to promote more equitable access to SNAP as more households apply for assistance remotely and more staff telework.

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

Prior to the pandemic, most states provided online access for SNAP recipients to apply for SNAP, submit documents, and recertify eligibility for SNAP benefits. During the pandemic, only a small share of states expanded or added new online functionality and few states were able to build out additional mobile-friendly services. Compared to online services, telephonic services for applications and recertifications were more limited prior to the pandemic and were newly adopted during the emergency response at a slightly higher rate than online or mobile-friendly options. Moreover, most states did not have machine reading or intelligent scanning capabilities prior to the pandemic and very few were able to add these functions during the public health emergency. In open-ended responses and other sections of the survey, many states reported that existing technology was an important factor in their transition toward virtual services and making effective use of certain waiver flexibilities. However, the limited adoption and expansion of new technology during the pandemic indicates longer-term investments are needed to further modernize SNAP case processing and highlights the challenges of making major system changes during crisis response.

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

A majority of state agencies had to make staffing changes to help manage application processing and case management during the pandemic, most commonly redeploying workers from other SNAP program areas or from other programs within the state agency to supplement existing resources. A smaller share of states added capacity through expanding use of non-merit staff or hiring new staff. More research is needed to understand whether and the extent to which state hiring freezes and federal restrictions on activities of non-merit staff influenced use of these options in the pandemic response. The number of states that had to make major changes in staffing core case functions in addition to selecting waiver flexibilities reinforces just how significantly the pandemic stretched SNAP agency resources.

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

By the fall, most states had transitioned off waivers that allowed temporary suspension of overpayment claims collection and adjustment of fair hearings time frames. However, many states reported that having these flexibilities available during the early months of the public health emergency was important for helping maintain benefit access for SNAP recipients. For these two processes, which generally only affect a small subset of the SNAP caseload, states appeared to face less severe disruptions necessitating ongoing adjustments during the pandemic.

SECTION 3. FOOD ASSISTANCE AND FOOD PURCHASING

Introduction

This section analyzes state agency perceptions of the design and implementation of two important flexibilities during the pandemic that increased food assistance and purchasing power for SNAP recipients. This section includes:

- A summary of, and state perspectives on, SNAP emergency allotments, which provided temporary increases in food assistance for most SNAP recipients.
- A summary of, and state perspectives on, the SNAP Online Purchasing Pilot (OPP), which provided SNAP recipients the ability to use SNAP benefits for online food purchasing.

SECTION 3.1. EMERGENCY ALLOTMENTS

“Some months we received approval later than others. When approval was received the last week of the month, it delayed the release of the supplement to bring households up to the maximum level.”

-State Survey Respondent

In response to sharp increases in food insecurity early in the pandemic, Congress authorized states to provide supplemental benefits, known as emergency allotments, to households participating in SNAP. The statutory language required that both a national public health emergency and a state disaster or emergency declaration due to COVID-19 be in effect for states to issue emergency allotments. Furthermore, the statute limited emergency allotments to address temporary food needs not greater than the applicable maximum monthly allotment for the household size. In ensuing guidance, FNS interpreted this language to permit states to bring all households up to

the maximum SNAP benefit amount for the given household size.¹²

The emergency allotments legislation, as enacted by Congress and interpreted by FNS, resulted in supplemental benefit amounts for SNAP recipients that varied widely based on each household’s existing regular SNAP benefit allotment. Households already receiving the maximum SNAP benefit amount for their household size - approximately 40% of SNAP households as of FY 2019 - received no emergency allotment through the waiver since the combined value of regular SNAP benefits and emergency allotments could not exceed the maximum benefit amount.¹³ These households generally have the lowest incomes and highest rates of food insecurity within the SNAP caseload. Conversely, SNAP households with lower regular SNAP benefits received significant boosts through emergency allotments,

¹² U.S. Department of Agriculture, Food and Nutrition Services. (20 March 2020). Emergency Allotments Guidance. <https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP-COVID-EmergencyAllotmentsGuidance.pdf>

¹³ Center on Budget and Policy Priorities. (2021). States are Using Much-Needed Temporary Flexibility in SNAP to Respond to COVID-19 Challenges. Retrieved from <https://www.cbpp.org/research/food-assistance/states-are-using-much-needed-temporary-flexibility-in-snap-to-respond-to>

covering the difference between their regular benefit and the maximum benefit amount for their household size. For example, at the beginning of FY 2021, a household of two receiving the minimum SNAP benefit of \$16 would qualify for a \$358 monthly emergency allotment to bring them to the maximum benefit of \$374.

Upon initial guidance issued on March 20, 2020, all 50 states, the District of Columbia, Guam, and the Virgin Islands were approved to issue emergency allotments for two months. After initial approval, FNS provided month-to-month extensions to continue emergency allotments, contingent on states confirming that their emergency or disaster declaration remained active. For the duration of the calendar year, only two states discontinued emergency allotments at any point - one discontinuing for a single month and one discontinuing for a three-month period as a result of expiring state public health emergencies.

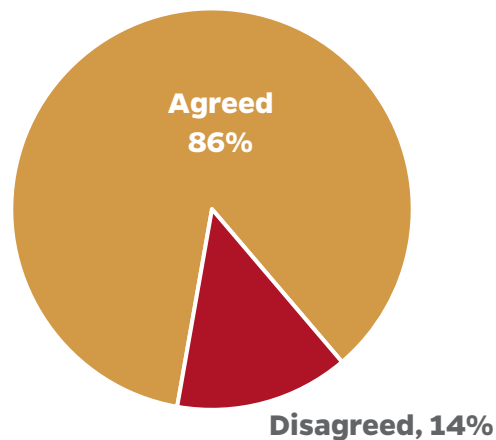
“Clients who were already at the maximum benefit allotment did not get anything more and they were the most vulnerable during the pandemic.”

-State Survey Respondent

In open-ended responses, states commented that this monthly approval process was burdensome for IT and policy staff, and that late approvals from FNS caused delays in state issuance of supplemental benefits. As one state suggested, “having the option to provide emergency allotments based on the

national public health emergency” would have mitigated these challenges and been helpful for state planning. Despite limitations implementing supplemental SNAP benefits on a monthly basis, most states (86%) believed that clients had a clear understanding of the emergency allotments, and that this program adaptation was “very easy to explain to households” (Exhibit 3.1.1).

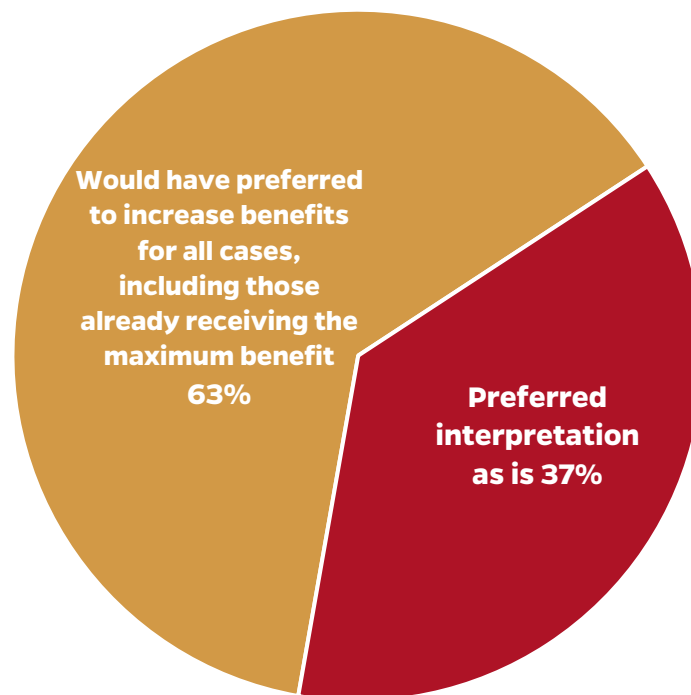
EXHIBIT 3.1.1. Agreement That Clients Had a Clear Understanding of Emergency Allotments (N=42)*



*States missing responses not included in denominator (n=1).

When originally authorized, several states requested alternative methods of distributing emergency allotments that would have allowed households already receiving the maximum benefit to receive a supplement; however, these states received a mass denial notice from FNS in April. As shown in **Exhibit 3.1.2**, nearly two-thirds of states surveyed (63%) would have preferred to increase SNAP benefits for all households, including those already receiving the maximum benefit. Since the survey was administered, the White House directed USDA to consider issuing new guidance that would allow states to increase emergency allotments for those who need it most. On April 1, 2021, USDA announced that beginning in April, households that had not received at least \$95 per month in increased benefits through emergency allotments would be eligible to receive additional benefits. Further research on this change in policy is needed.

EXHIBIT 3.1.2. State Preference on Emergency Allotment Distribution (n=41)*



*States missing responses not included in denominator (n=2).

SECTION 3.2. ONLINE PURCHASING PILOT

The SNAP Online Purchasing Pilot (OPP), which allows the use of SNAP benefits for online grocery purchases, rapidly expanded during the pandemic. The OPP was first authorized under the 2014 Farm Bill and was created to improve access to healthy food for SNAP participants, including people in rural areas, those who lack transportation, and people with

mobility limitations. New York was the first state to launch the OPP in 2019, at which time 7 additional states had been selected to participate. Yet, as of March 2020, only four states and four retailers (Amazon, Walmart, Shoprite, and Wright’s Market) accepted SNAP for online purchases. The issuance of stay-at-home orders, decrease in public transportation options, and need to socially distance in response to the pandemic, laid bare the needs and disparities in access to online grocery purchasing for SNAP recipients. In response to the heightened need and demand, USDA opened up the pilot to all states and has since worked diligently to expand the number of states and retailers approved for the OPP. As of May 2021, 47 states and the District of Columbia were operational with at least one retailer, and the list of authorized stores had grown to eighteen.¹⁴

Outreach to Retailers

A significant limitation of the Online Purchasing Pilot has been its ability to quickly recruit and approve a diverse group of retailers. For most of 2020, Walmart and Amazon were the only retailers approved in many states, and more recently ALDI has been approved to operate across the country. These chains often offer limited services in rural areas.¹⁵ Few small and independent stores have been approved due to insufficient e-commerce infrastructure and staff capacity to provide personal shopping and delivery services. State agencies could assist with retailer recruitment, and about 64% of the forty states participating in this survey and approved for the OPP conducted at least some outreach to retailers. States most commonly approached retail trade associations (51%) and chain retailers (28%) as compared to individual stores (15%) (Exhibit 3.2.1).

EXHIBIT 3.2.1. Outreach Conducted by State Agencies to Retailers to Encourage Participation in the Online Purchasing Pilot (N=39)*

| States conducted outreach to... | n (%) |
|---------------------------------------|----------|
| ...individual retailers | 6 (15%) |
| ...chain retailers | 11 (28%) |
| ...retail trade associations | 20 (51%) |
| ...other † | 2 (5%) |
| Did not conduct outreach to retailers | 14 (36%) |

*Includes only states participating in the Online Purchasing Pilot. States missing responses not included in denominator (n=1).

†Other responses included (1) outreach to farmers’ markets; or (2) retailers reached out to states.

¹⁴ U.S. Department of Agriculture, Food and Nutrition Services. (2021). FNS Launches the Online Purchasing Pilot. <https://www.fns.usda.gov/snap/online-purchasing-pilot>

¹⁵ Brandt, E., Silvestri, D., & Mande, J. (2019) Availability of grocery delivery to food deserts in states participating in the Online Purchasing Pilot. JAMA Netw Open, 2(12).

Of states that reported conducting outreach (N=24), all reported that some or most retailers were interested in participating in the OPP. Among states where fewer retailers were interested in participating (N=16), thirteen states responded with common reasons for retailer disinterest, including the lack of existing online purchasing capacity (77%), lack of capacity or resources to create and sustain technical components (62%), expensive start-up and continuing operation costs (38%), the burdensome process of becoming an FNS-authorized online retailer (38%), and lack of understanding or awareness of the OPP (38%)(**Exhibit 3.2.2**). In open-ended responses, some states noted that there is a misconception that states determine which retailers can participate in the OPP; however, this process is fully managed by FNS. Several states requested greater transparency and communication from FNS regarding the retailer approval process. The rapid expansion of the OPP into a nationwide program during a pandemic likely contributed to early communication challenges between FNS, states, and retailers. Further research related to the challenges and opportunities in increasing equitable access to online purchasing is needed.

EXHIBIT 3.2.2. Reasons for Retailer Disinterest in the Online Purchasing Pilot (N=13)*

| Reason | n (%) |
|--|--------------|
| Expensive start-up and continuing operating costs | 5 (38%) |
| Limited number of FNS-approved third party processors | 2 (15%) |
| Limited capacity or resources to create and sustain technical components | 8 (62%) |
| Burdensome application, approval, and testing process | 5 (38%) |
| Lack of understanding or awareness about SNAP online purchasing | 5 (38%) |
| Lack of existing online purchasing capability | 10 (77%) |
| Other† | 3 (23%) |

*Includes states that reported conducted outreach to retailers in which fewer retailers were interested in participating. States missing responses not included in denominator (n=3).

†Other reasons were (1) the start-up costs are expensive, but the continuing costs are not; or (2) FNS appears to be limiting retailer access.

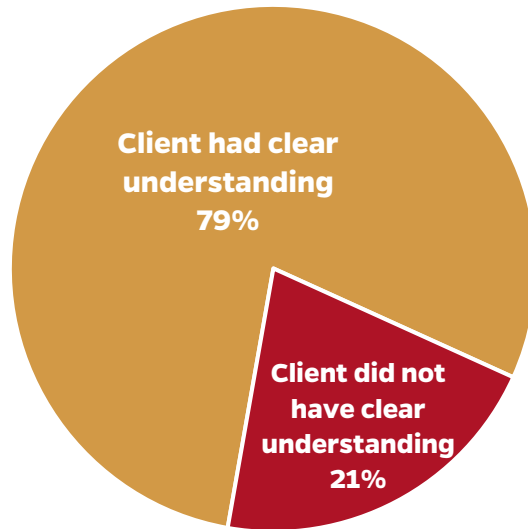
Barriers to Access and Client Understanding of the Online Purchasing Pilot

While most states (79%) reported that clients clearly understood the OPP, early data suggest that adoption of online purchasing among SNAP beneficiaries has been low (**Exhibit 3.2.3**).¹⁶ As shown in **Exhibit 3.2.4**, states most commonly perceived the cost of delivery or other fees (87%), lack of participating retailers (85%), and lack of access to reliable internet or cell service

¹⁶ Foster, I., Polselli, A., Hoffs, C., Nocker, C., LeBoa, C., Rummo, P., Brandt, E., & Rimm, E. (10 February 2021). Understanding Nationwide Update: An Analysis of the Newly Expanded SNAP Online Purchasing Program during 2020. Retrieved from <https://www.unboxproject.org/snap-online-purchasing-brief>

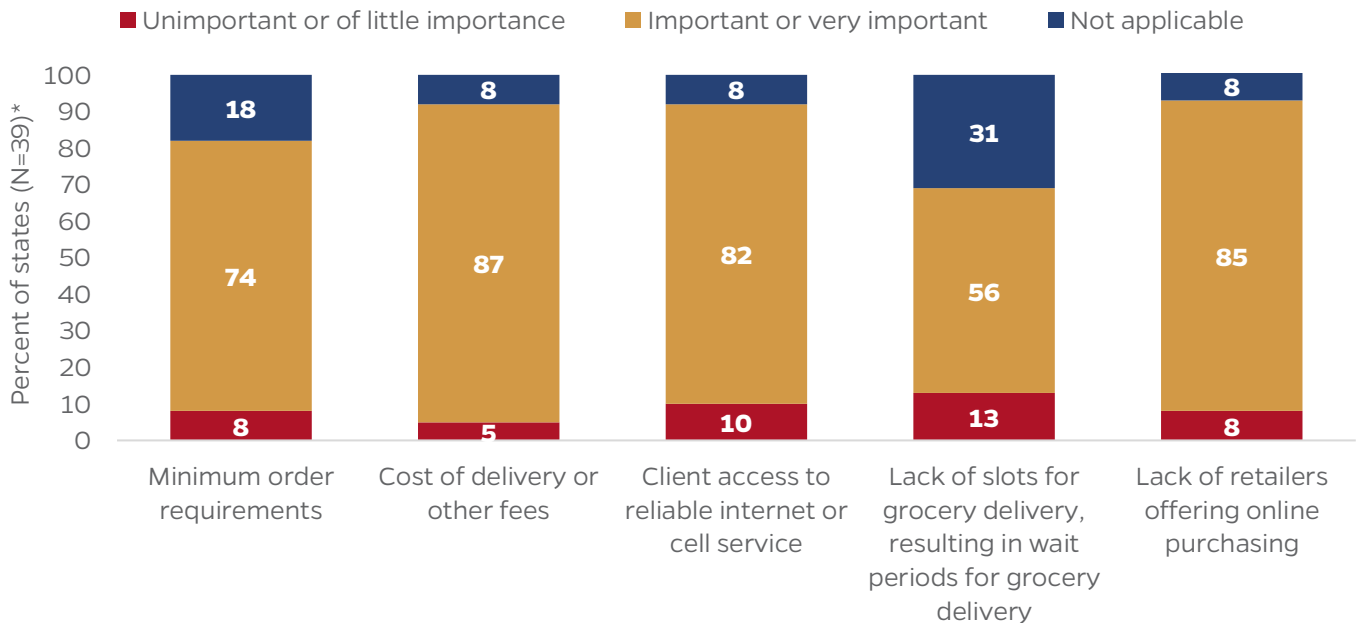
(82%) as barriers to utilization. Minimum order requirements (74%) and wait times for grocery delivery (56%) were also perceived as important barriers by the majority of states.

EXHIBIT 3.2.3. Agreement That Clients Had a Clear Understanding of the Online Purchasing Pilot (N=39)*



*States missing responses not included in denominator (n=1).

EXHIBIT 3.2.4. Perceptions of Client Barriers to Utilizing Online Purchasing



*States missing responses not included in denominator (n=1).

Note: Not all bars sum to 100% due to rounding.

SECTION 3.3. KEY FINDINGS

Food Assistance and Food Purchasing

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

Emergency allotments were and continue to be a critical means of providing supplemental benefits to SNAP beneficiaries as the pandemic and economic downturn continue into the year 2021. Two-thirds of state agencies that responded to this survey would have preferred to extend emergency allotments to those already receiving the maximum benefits. This would have provided supplemental benefits to the nearly four in ten SNAP households that were already receiving the maximum benefit prior to the pandemic. By excluding these households from benefitting from the emergency allotment legislation, states were unable to provide additional assistance to many who were already experiencing high food insecurity and likely were disproportionately impacted by the COVID-19 pandemic. Shortly before the survey was closed, Congress authorized a 15% increase in SNAP benefits that increased assistance for all households, and as of April 1, 2021, FNS revised its guidance on emergency allotments to provide further assistance for households at or near the maximum benefit amount. Additional state perspectives on how these policy shifts impacted equitable distribution of food assistance during the pandemic response is needed.

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

Emergency allotments were allowed to be issued to eligible clients as long as there was a federal public health emergency (PHE) declaration as well as a PHE declaration within the state. This required states to submit to FNS an intent to issue supplemental benefits each month. States received approval later in some months than others, which ultimately delayed the release of the supplemental benefit to eligible households. Tasks such as communication to field staff, clients, and other stakeholders often required IT systems to be put on hold each month in order to prepare for the emergency allotments. Some states suggested a longer-term approval, or blanket approval, for the issuance of emergency allotments so long as the federal government was under a national PHE rather than requiring the state to have a PHE declaration. In discussions since the survey, states have expressed challenges with their government lifting PHE declarations, therefore impacting the ability of state agencies to issue emergency allotments to SNAP beneficiaries who continue to need the additional support to feed themselves and their families. In many ways, the need for supplemental benefits is more directly tied to the economic effects of the pandemic, which will likely persist well beyond both state and federal PHE declarations.

“The month-to-month approval process has been an administrative burden for IT systems and policy staff as the tasks each month are repetitive.”

-State Survey Respondent

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 more broadly utilize online purchasing in SNAP.

The expansion of the Online Purchasing Pilot is a critical step toward improving food access for SNAP recipients, especially during the pandemic, when SNAP beneficiaries have faced additional challenges to food purchasing such as stay-at-home orders, social distancing requirements, and reduced public transport options. USDA has worked diligently to make the OPP available nationwide during the pandemic, but retailer participation remains low, particularly among small and independent retailers. Although most state agencies conducted at least some outreach to retailers to encourage participation in the OPP, they perceived several barriers to retailer participation, including a lack of existing online capacity to support online purchasing, lack of the technical resources needed to implement the program, and a slow approval process. Many states would have preferred more communication and transparency from FNS about the retailer approval process to better respond to store requests and assist with applications. States noted that technical assistance and financial support from FNS could facilitate participation among smaller, local retailers and support small businesses during the pandemic. Although client perspectives on the Online Purchasing Pilot were not collected in this survey, states were asked about perceived barriers to client adoption of the OPP. States most commonly perceived the high delivery and other fees, lack of participating retailers, and lack of reliable internet or cellular service as being important barriers to client utilization of online purchasing. These potential barriers in client access raise important policy considerations for how to support online purchasing and delivery of food in SNAP.

“There is a communication gap when a retailer applies directly to FNS for participation in this pilot. It would be helpful to know from FNS which retailers in our state and region are in the application process.”

-State Survey Respondent

SECTION 4. COMMUNICATIONS AND CUSTOMER ENGAGEMENT

Introduction

This section analyzes the various methods of communication and customer engagement that states utilized and implemented during the pandemic. This section is organized by:

- A summary of how states communicated program changes;
- An analysis of adaptations and modifications made to SNAP Outreach;
- An analysis of adaptations and modifications made to SNAP-Ed; and
- An analysis of adaptations and modifications made to SNAP E&T.

SECTION 4.1. COMMUNICATING PROGRAM CHANGES

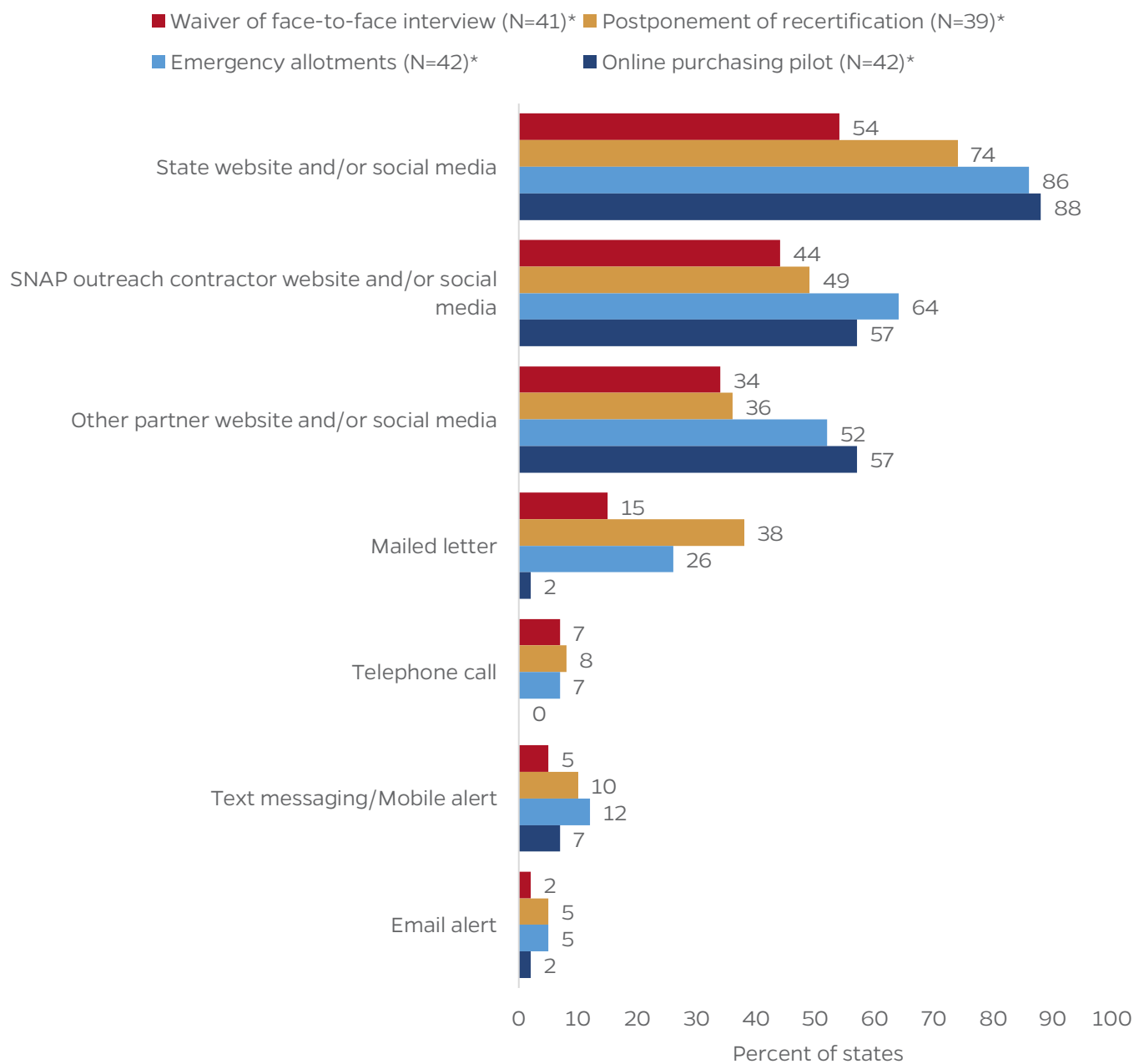
The COVID-19 pandemic reflects one of the most turbulent periods in the history of SNAP, with numerous changes and programmatic shifts that impact how and when customers interact with the program. Further research is needed to understand existing and new client perspectives on whether they understood these changes and to what degree communications impacted program access during this period. A review of state approaches to communicating program changes during the pandemic offers some initial insights.

States utilize many channels of communication to notify clients of changes to SNAP, including social media, press releases, direct notifications, and call centers. For changes initiated by the state or federal government that affect a significant portion of the caseload, SNAP agencies are permitted to communicate via a “mass change” that does not require direct notifications to clients individually. This form of communication is commonly used to communicate annual adjustments in income eligibility standards, SNAP maximum allotments, and other standard or seasonal adjustments. During the pandemic, some of the most important program changes made to SNAP, such as waiving of interviews, extension of certification periods and periodic reporting dates, issuance of emergency allotments, and availability of the Online Purchasing Pilot, were done through mass changes.

Exhibit 4.1.1 examines the ways that states communicated mass changes to clients about the aforementioned program flexibilities implemented during the pandemic. State websites and social media were the most common methods of communication for interview waivers (54%), postponement of recertification (74%), emergency allotments (86%), and the OPP (88%). States also used SNAP outreach contractor websites and other partner websites or social media to communicate with clients. Other than social media, some states mailed letters to notify clients of the waiver of face-to-face interviews (15%), postponement of recertifications (38%), and issuance of emergency allotments (26%); this option was used much less frequently for notifying clients of the OPP (2%). The least common methods of communication during the pandemic included telephone calls, text messaging/mobile alerts, and email alerts. States relied

heavily on social media to notify clients of programmatic shifts and changes to their benefits. While this method of communication may be favorable to some clients, it may not be accessible or used by all clients, specifically elderly populations. Increased capabilities to leverage technology to communicate future mass changes via automated phone calls, text messaging, and e-mail may help to improve the reach and effectiveness of messaging important program updates.

EXHIBIT 4.1.1. Methods of Communicating with Clients about Program Flexibilities During the Pandemic



*States missing responses not included in denominator (n=2 for waiver of face-to-face interview, n=4 for postponement of recertification, n=1 for emergency allotments, n=1 for online purchasing program).

States also utilized various methods for communicating program changes with non-English speakers during the pandemic. As shown in **Exhibit 4.1.2**, most states (71%) translated notifications into Spanish, 29% of states translated notifications into languages other than Spanish, and over half of states (55%) provided translation services through a separate language call line. In open-ended responses, some states reported that they provided robo-calls in multiple languages, offered translation services upon request, or asked local agencies that assist with outreach to specific communities to provide translation support as needed.

EXHIBIT 4.1.2. Methods of Communicating with Non-English Speakers During the Pandemic (N=42)*

| Method of communicating with non-English speakers | n (%) |
|--|--------------|
| Translated notifications into Spanish | 30 (71%) |
| Translated notifications into languages other than Spanish | 12 (29%) |
| Provided translated services through a separate language call line | 23 (55%) |
| Other† | 5 (12%) |
| None of the above‡ | 6 (14%) |

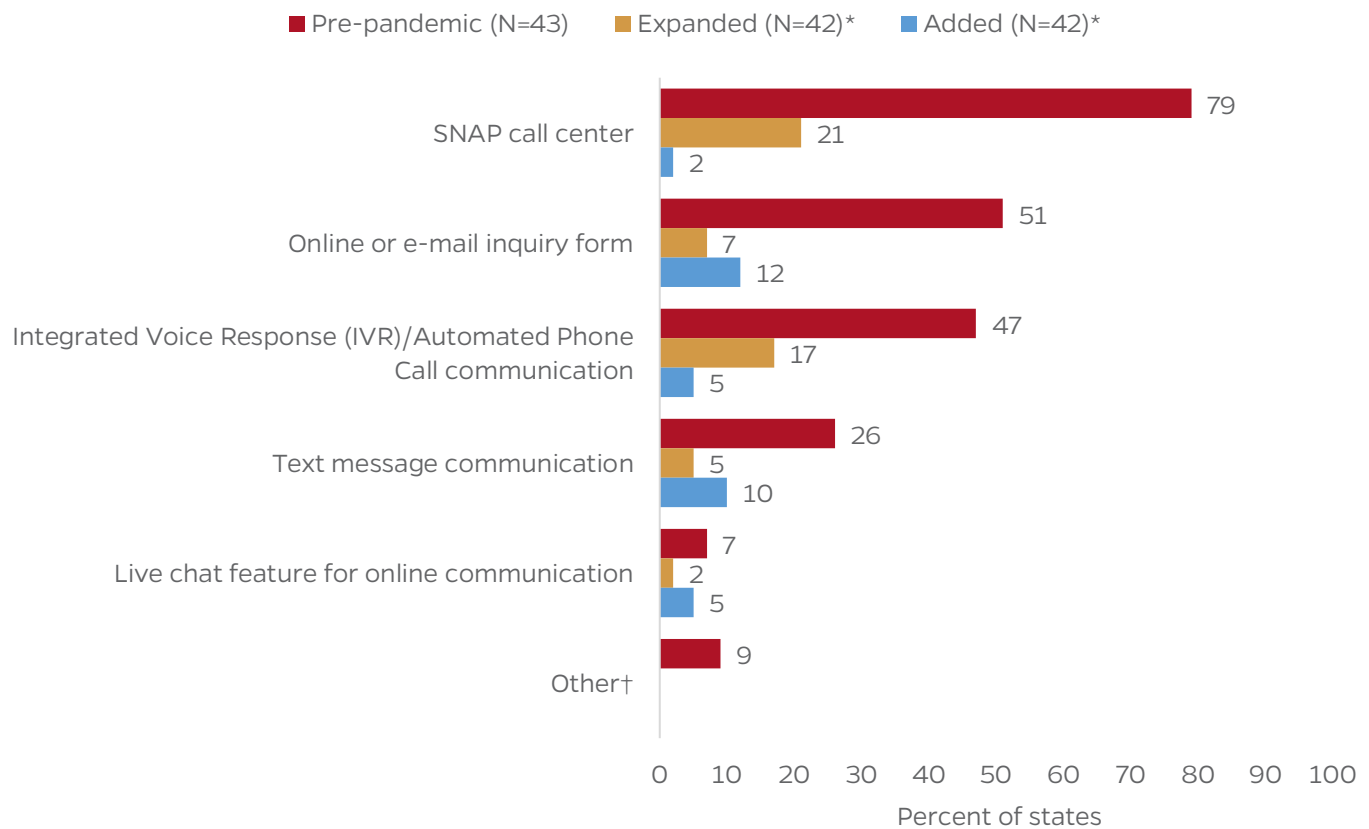
*States missing responses not included in denominator (n=1).

†Other methods included (1) robo-calls in multiple languages; (2) translation upon request; (3) translation into the most commonly spoken languages in the state; or (4) asking local agencies to assist with outreach to non-English speaking communities.

‡None of the above does not necessarily indicate no translation services were provided.

When communicating with clients during the pandemic, states could rely on existing methods of communication, expand the capabilities of their current technology, or develop new modes of communication. Data comparing changes in communication modes during the pandemic suggest that states generally had to rely on existing technology, likely due to the significant investment needed to build out new methods of communication. Prior to the pandemic, most states had call centers in place to communicate with SNAP clients (79%) and about one-fifth of states (21%) reported expanding these call centers during the pandemic (**Exhibit 4.1.3**). Integrated Voice Response (IVR) or Automated Phone Call communication was also commonly used prior to the pandemic (47%) and 17% of states expanded this method during the pandemic. For both of these frequently used methods of communication, very few states added new capabilities during the pandemic, likely due to the extensive time and infrastructure investment needed to launch such an effort. Online or e-mail inquiry forms and text message communications were both used among a sizeable subset of states prior to the pandemic (51% and 26%, respectively) and were newly adopted by a handful of states during the public health emergency (12% and 10%). Live chat features were generally used less than other methods of communication and one state wrote in an open-ended response that they found this method to be a “time sucker” during times of high demand.

EXHIBIT 4.1.3. Methods of Communicating with Clients Pre-Pandemic and Expanded Upon or Added During the Pandemic



*States missing responses not included in denominator (n=1 for expanded and added).

†Other responses pre-pandemic included (1) options varied by county; (2) face-to-face communication; or (3) banner messaging on website. Note: Mail (n=7), direct phone calls (n=6), and mobile applications (n=2). Other responses during the pandemic are not reported.

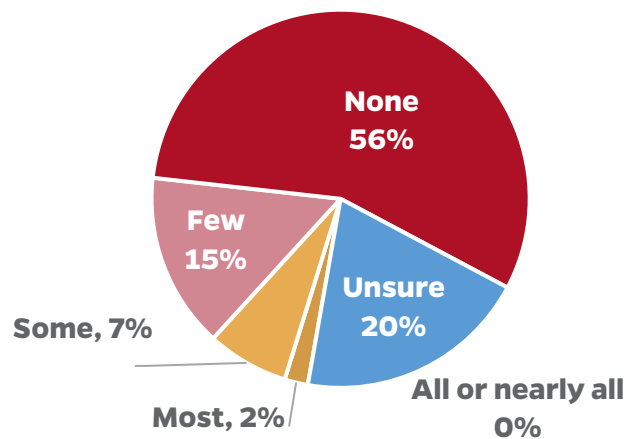
SECTION 4.2. SNAP OUTREACH

SNAP Outreach is a key function of SNAP that supports awareness of SNAP, eligibility pre-screening, application assistance, community outreach, and translation services. States interested in these outreach activities are required to submit a SNAP Outreach Plan and often contract with outreach partners to provide such services. When the pandemic required businesses to close and in-person activities became unsafe, SNAP Outreach staff and providers had to shift their outreach plans in order to continue to serve clients.

Prior to the pandemic, states worked with varying levels of SNAP Outreach contractors; over half (56%) of state agencies responding to the survey (N=43) reported having 1 to 5 outreach contractors and 25% reported more than ten (data not shown). States were asked several questions to assess how the pandemic affected SNAP Outreach contractors' operations, outreach strategies, and capacity during the pandemic. In most states (56%), SNAP

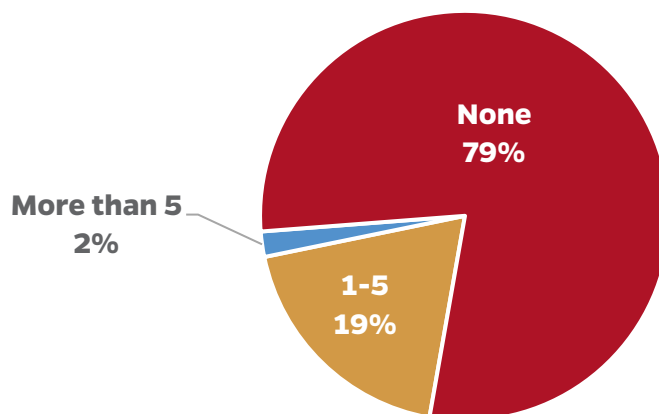
Outreach contractors remained open during the pandemic, however, 30% of states reported that at least one contractor was required to close, either temporarily or permanently (Exhibit 4.2.1). Despite the disruptions faced by some existing SNAP Outreach contractors, most states (79%) did not add new contractors during the pandemic (Exhibit 4.2.2). Taken together, these data suggest that state outreach contractors were less available to support the surge in demand for SNAP and communication of program changes in response to the pandemic.

EXHIBIT 4.2.1. SNAP Outreach Contractors Required to Temporarily or Permanently Close During the Pandemic, As Reported by States (N=41)*



*States missing responses not included in denominator (n=2).

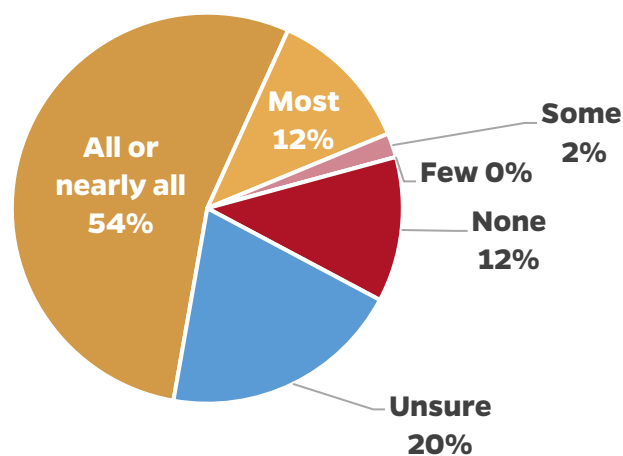
EXHIBIT 4.2.2 Number of SNAP Outreach Contractors Added During the Pandemic (n=42)*



*States missing responses not included in denominator (n=1).

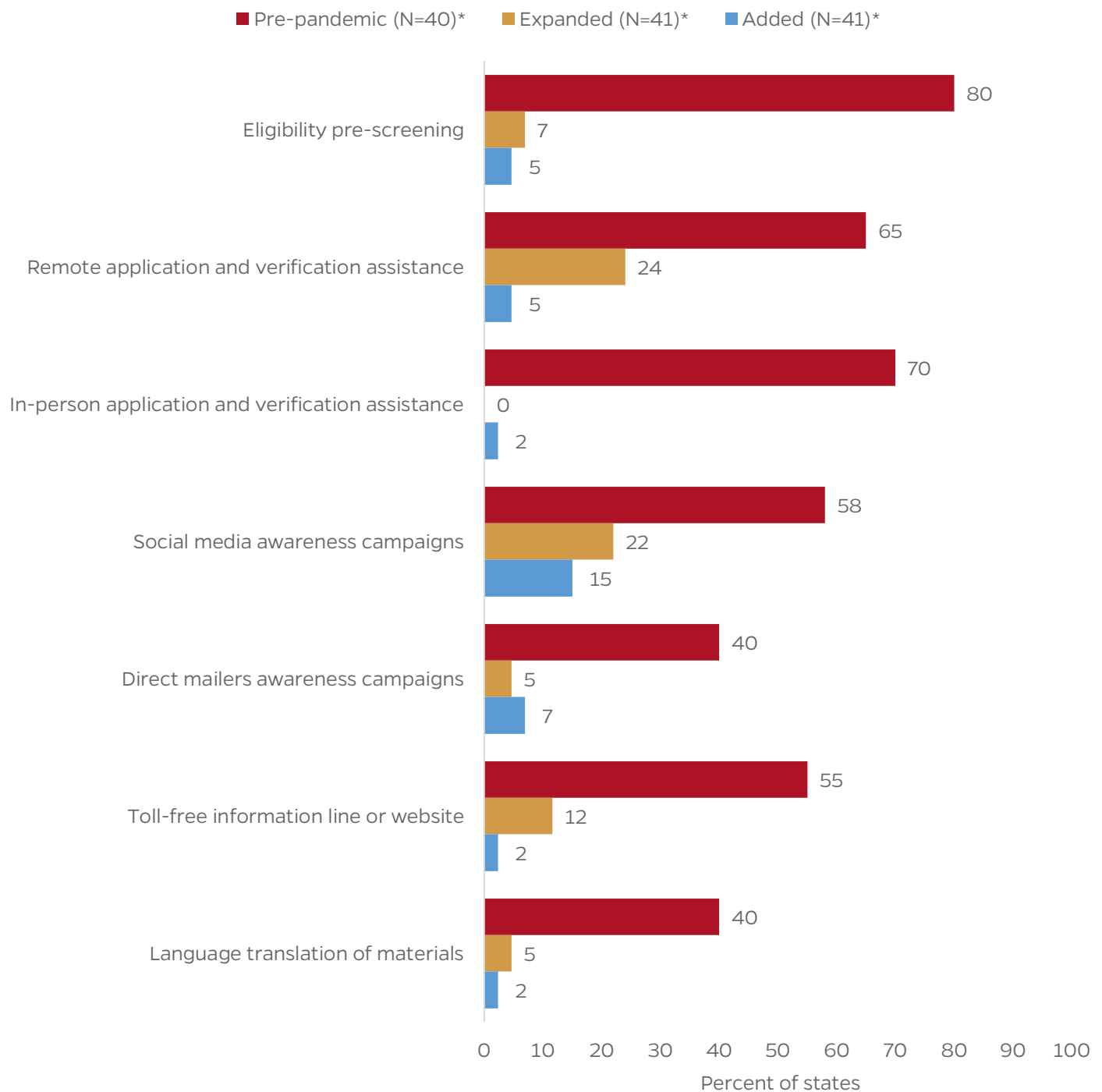
Although the composition of who provided SNAP Outreach did not change much during the pandemic, many states and their community partners adapted their methods of outreach. Fifty-four percent (54%) of states reported that all or nearly all of their SNAP Outreach contractors had to modify their outreach plans during the pandemic, suggesting there were major changes in outreach components, state policies, and/or outreach locations (Exhibit 4.2.3). The methods of outreach utilized prior to the pandemic and those that were expanded or newly added during the pandemic are explored in Exhibit 4.2.4. While more than half of the states responding to our survey indicated that they did not add or expand outreach activities during the pandemic (54%), some outreach contractors did modify the availability of activities. Eligibility pre-screening was the most common outreach activity prior to the pandemic (80%), but few states expanded upon (7%) or added (5%) this activity during the pandemic. While in-person application and verification assistance were offered by 70% of states prior to the pandemic, no states expanded and only one state added this activity during the pandemic. In many states, SNAP Outreach contractors offered remote application and verification assistance prior to the pandemic (65%) and in 24% of states, Outreach contractors expanded upon this service during the pandemic, reflecting the shift from in-person toward remote delivery of services. Social media awareness campaigns were used by 58% of states prior to the pandemic and 22% of states expanded this activity during the pandemic. Social media awareness campaigns were the most common newly added activity during the pandemic (15%), followed by direct mailers awareness campaigns (7%). More often than not, states that already implemented an outreach activity were more likely to expand upon that activity than a state was to add an activity it did not have prior to the pandemic. These findings suggest that more staffing, resources, and support may have been needed to add new outreach activities during the pandemic.

EXHIBIT 4.2.3. Proportion of SNAP Outreach Contractors that Modified Plans During the Pandemic (N=41)*



*States missing responses not included in denominator (n=2).

EXHIBIT 4.2.4. SNAP Outreach Activities Conducted Pre-Pandemic and Expanded Upon or Added During the Pandemic



*States missing responses not included in denominator (n=3 pre-pandemic and n=2 for expanded and added).

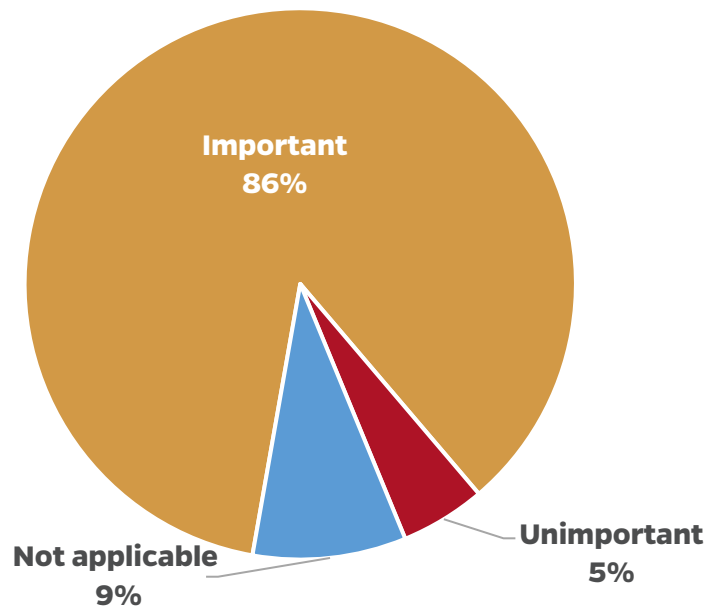
Note: Other activities included (1) mobile food banks; or (2) mobile apps to assist with finding food resources. Two states (5%) reported not having outreach contractors pre-pandemic, two states (5%) responded “none of the above” pre-pandemic, and 22 states (54%) reported not adding or expanding outreach activities during the pandemic.

Though the transition to remote work was difficult for contractors, they played a critical role in notifying clients of benefit changes, eligibility, and the many other program adaptations that took place in response to the pandemic. Most states (86%) responded that SNAP Outreach contractors were important or very important for implementing program flexibilities during the pandemic (Exhibit 4.2.5).

“Our SNAP Outreach partners have been a tremendous help during The pandemic. Having the additional resources to help educate clients was very beneficial.”

-State Survey Respondent

EXHIBIT 4.2.5. Importance of Client Communications and Outreach Plans for Implementing Program Flexibilities During the Pandemic (N=43)



SECTION 4.3. SNAP-ED

SNAP-Ed is the nutrition education component of SNAP, providing funding for states to conduct nutrition education and support individuals and families in leading healthy lives. SNAP-Ed activities include direct nutrition education such as in-person cooking classes or other methods to teach grocery shopping, cooking, and other skills to pursue a healthy diet. SNAP-Ed also works to build partnerships with community organizations to implement policy, systems, and environmental changes (e.g., working with supermarkets on strategies to promote healthier products in stores). The program has goals of improving both quality of diet and quality of life, reducing risk for diet-related diseases, and increasing participants' confidence in food purchasing and preparation.

SNAP-Ed activities must reflect evidence-based services that are targeted to individuals eligible to receive SNAP or other means-tested federal assistance programs and individuals residing in communities with a significant low-income population. States must document and operate their services in accordance with an approved SNAP-Ed plan. Services are frequently provided through a state's Land-Grant University System, primarily through affiliated Cooperative Extension Systems. The need for social distancing and the shift to virtual services during the pandemic significantly impacted where and how SNAP-Ed services could be delivered.

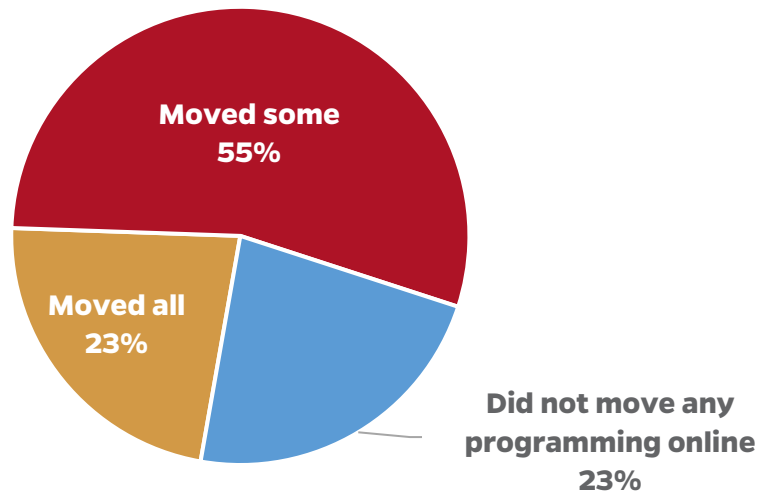
“Our SNAP-Ed was in the process of creating online lessons prior to the public health crisis. As the materials were already in the process of being created, our SNAP-Ed was able to quickly move up the timeline and release the online lessons quicker than planned.”

-State Survey Respondent

Prior to the pandemic, no states offered SNAP-Ed fully online. During the pandemic, 23% of states moved their SNAP-Ed curriculum fully online and 55% moved some SNAP-Ed programming online (**Exhibit 4.3.1**). Of respondents that had some SNAP-Ed programming online prior to the pandemic (N=22), 32% moved all SNAP-Ed programming online, compared to only 11% of respondents that had no SNAP-Ed programming online prior to the pandemic (N=18) (**Exhibit 4.3.2**). This suggests that full

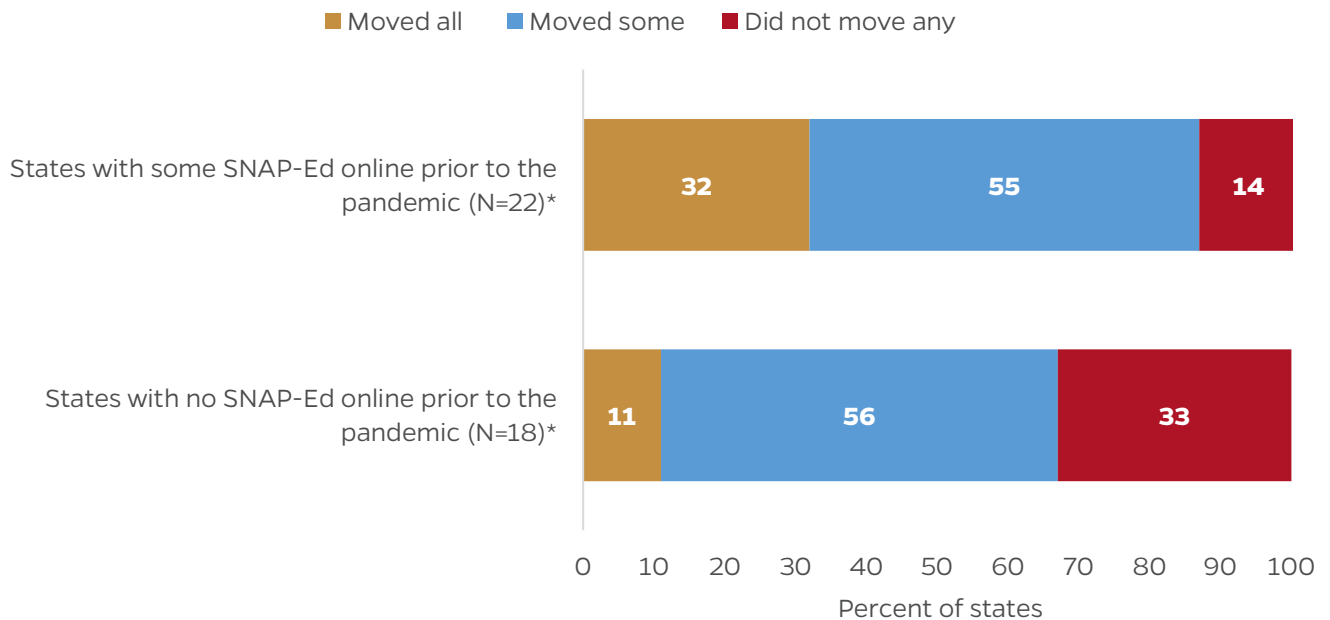
adoption of virtual educational curricula was likely easier in states where customers and SNAP-Ed implementers were already familiar with online nutrition education services. While most states moved at least some SNAP-Ed programming online, 23% of states did not move any SNAP-Ed programming online during the public health emergency (**Exhibit 4.3.1**).

EXHIBIT 4.3.1. Proportion of States That Moved SNAP-Ed Programming Online During the Pandemic (N=40)*



*States missing responses not included in denominator (n=2).
 Note: Pie chart does not sum to 100% due to rounding.

EXHIBIT 4.3.2. Proportion of States with Some or No SNAP-Ed Programming Online Prior to the Pandemic that Moved SNAP-Ed Online During the Pandemic



*States missing response not included in denominator (n=1 for some SNAP-Ed online and n=1 for no SNAP-Ed online).
 Note: Not all bars sum to 100% due to rounding.

Modifications to SNAP-Ed Curricula

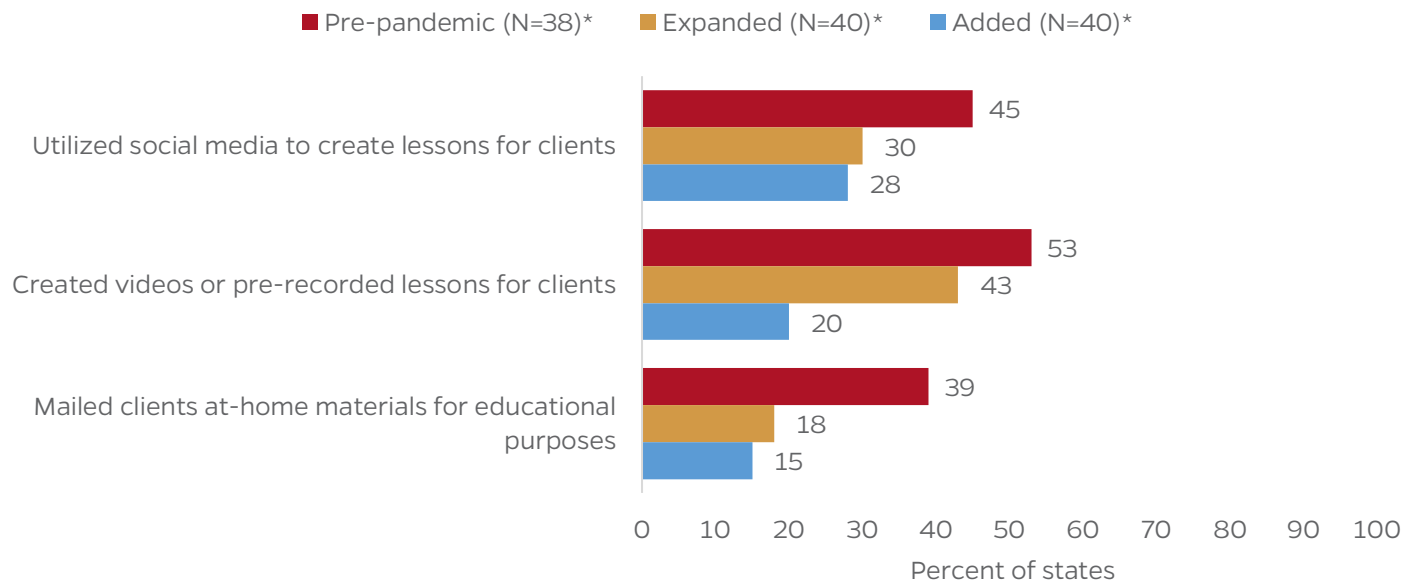
“Many SNAP-Ed agencies did not actively use social media prior to the pandemic, so there was a significant transition, particularly in building a following with the qualifying SNAP-Ed audience.”

-State Survey Respondent

Several modifications were made to the content and delivery of SNAP-Ed curricula during the pandemic to better meet client needs. As shown in **Exhibit 4.3.3**, social media was used by SNAP-Ed partners in almost half of states prior to the pandemic (45%) and was expanded upon or newly added by many states during the pandemic (30% and 28%, respectively). The shift to social media was not easy for all SNAP-Ed partners, especially those that did not use social media as a part of their program prior to the

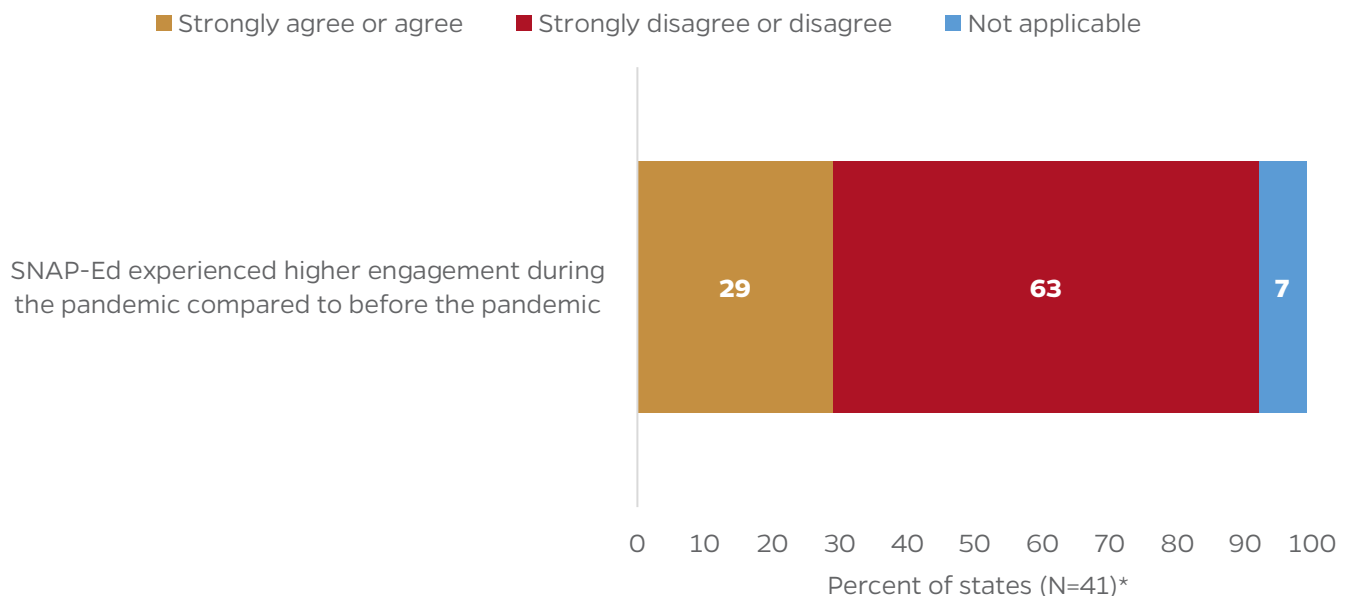
pandemic. In open-ended responses, one state elaborated that building a following with existing clients was difficult for partners that were not active on social media prior to the pandemic. Many states expanded upon (43%) or added (20%) videos and pre-recorded lessons for clients during the pandemic as most curriculum shifted to virtual settings. Prior to the pandemic, 39% of state SNAP-Ed partners mailed clients at-home materials for educational purposes. This method was expanded upon by 18% of states and newly added by 15% of states. Given the opportunity to create new curriculum in response to the pandemic, 30% of states created new lessons that centered around public health safety during a public health crisis (data not shown). Other options prior to the pandemic included text-messaging, in-person classes, and magazines; and modifications during the pandemic included contracted services or adapting existing curricula to be implemented online. Although remote SNAP-Ed was an important tool for enabling continued nutrition education during the pandemic, many states saw lower customer engagement than usual. As shown in **Exhibit 4.3.4**, 63% of states disagreed or strongly disagreed with the statement that SNAP-Ed experienced higher engagement during the pandemic compared to before the pandemic.

EXHIBIT 4.3.3. Modes of Delivering SNAP-Ed Pre-Pandemic and Options Added and Expanded Upon During the Pandemic



*States missing responses not included in denominator (n=5 for pre-pandemic, n=2 for expanded and added).
 Note: Other options pre-pandemic included (1) text messaging; (2) in-person classes; or (3) magazines. Other modifications during the pandemic included (1) utilizing public health and nutrition education information distributed through other channels; or (2) adapting existing curricula for the online setting. Nine states (24%) answered “none of the above” pre-pandemic and 10 states (25%) answered “none of the above” during the pandemic.

EXHIBIT 4.3.4. Agreement That SNAP-Ed Experienced Higher Engagement During the Pandemic Compared to Prior to the Pandemic



*States missing response not included in denominator (n=2).
 Note: Bar does not sum to 100% due to rounding.

SECTION 4.4. SNAP EMPLOYMENT & TRAINING

The SNAP Employment & Training (SNAP E&T) program provides training and support services for SNAP recipients seeking work. States have flexibility in determining which SNAP recipients they serve through SNAP E&T and whether participation is voluntary or mandatory. Services include participant assessments, case management, a wide range of employment and training activities (e.g., job search, work experience, skill development, etc.), and supportive services that are directly related to participation in employment and training activities (e.g., transportation, dependent care costs, safety equipment, supplies). Services are typically

“The loan requirements for laptops for SNAP E&T (and the associated inability for providers to issue laptops as a participant reimbursement) were a significant barrier for our providers with less than a third of providers opting in to offer laptop loans.”

-State Survey Respondent

offered by local providers such as non-profits, community colleges, American Job Centers, and other organizations. Similar to SNAP-Ed, the pandemic disrupted the way in which SNAP E&T services are provided, forcing states and their partners to adapt to virtual services. Furthermore, SNAP E&T services were tangentially impacted by Congress' decision to waive mandatory work requirements for working-age SNAP recipients without children (known as Able-Bodied Adults Without

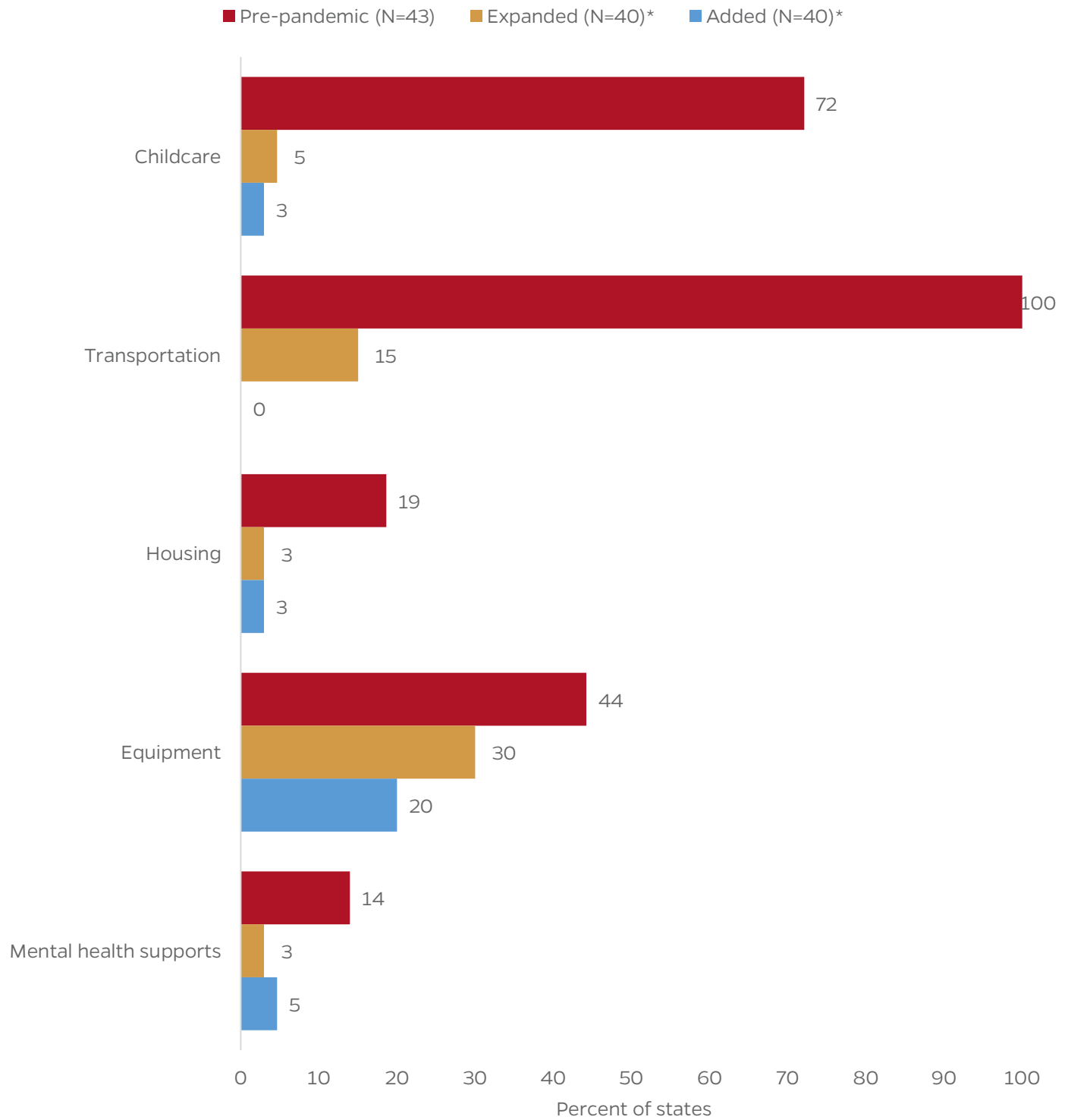
Dependents or ABAWDs) during the public health emergency, as some of these recipients may satisfy their work requirements through participation in SNAP E&T.

As shown in **Exhibit 4.4.1**, states generally did not expand or add SNAP E&T supportive services during the pandemic, with the exception of equipment; 30% of states expanded access to equipment and 20% newly added equipment. Based on open-ended feedback, equipment purchases were used to support virtual employment and training services, and included services such as loaner laptops, cell phones, or wireless internet. One state noted that the inability to issue laptops as participant reimbursement “limited the resources we could use to address the digital divide”. Another state wrote that loaner laptops were not something that states were issuing prior to the pandemic, but that it became common during the pandemic.

50%

of states added or expanded access to equipment, such as loaner laptops, cell phones, or wireless internet, to support virtual employment and training services.

EXHIBIT 4.4.1. SNAP E&T Services Offered Pre-Pandemic and Expanded Upon or Added During the Pandemic



*States missing responses not included in denominator (n=3 for expanded and added).

Note: Other services offered pre-pandemic included cell phones for participants in Job Retention Services. Other services during the pandemic included clarifying that PPE and medical testing could be covered under supplies and medical or personal hygiene.

In guidance issued in April of 2020, FNS informed states they could alter program rules, as allowable within the statute, to better respond to community needs during the pandemic. Some states reported modifying administrative processes in response to the public health emergency, including case management (33%), provider requirements (25%), eligibility verification (18%), and work participation verification (15%) (**Exhibit 4.4.2**).

EXHIBIT 4.4.2. Modifications to SNAP E&T Administrative Processes During the Pandemic (N=40)*

| Modification | n (%) |
|---------------------------------|----------|
| Case management | 13 (33%) |
| Provider requirements | 10 (25%) |
| Eligibility verification | 7 (18%) |
| Work participation verification | 6 (15%) |
| Data collection | 4 (10%) |

*States missing responses not included in denominator (n=3).
 Note: Twenty-three states (58%) selected “none of the above”.

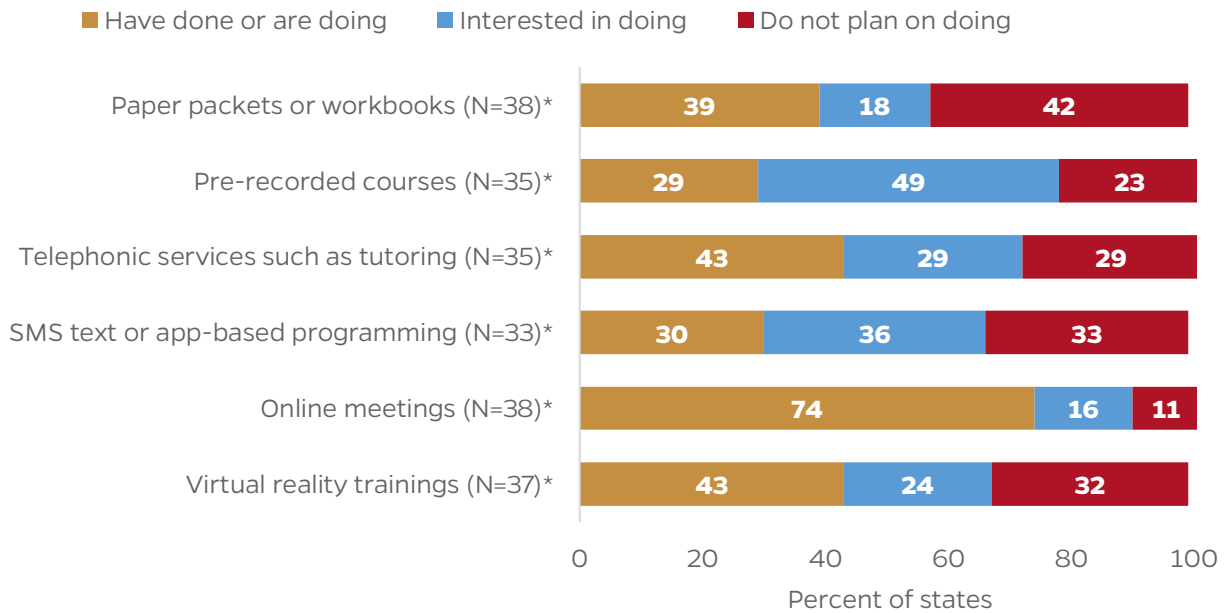
“In general, our biggest challenge has been participant engagement given our program being voluntary and the pandemic making it harder to reach potential participants.”

-State Survey Respondent

While there appears to be limited change in the types of supportive services provided through SNAP E&T during the pandemic, other data suggest that states did make shifts within existing activities to support virtual services. As shown in **Exhibit 4.4.3**, nearly three-quarters of states provided online meetings for SNAP E&T and a significant share of states also provided other remote services, including virtual reality training (43%),

telephonic services (43%), and paper packets or workbooks (39%). While fewer states offered pre-recorded courses (29%), nearly half (49%) indicated they were interested in doing so. Despite the shift to remote services, most states (73%) disagreed or strongly disagreed with the statement that their SNAP E&T program experienced higher engagement during the pandemic compared to before the pandemic (**Exhibit 4.4.4**). Collectively, these data show significant advancement in supporting remote SNAP E&T services, though states remain interested in building additional capacity. Additional research would be helpful to understand how virtual services may impact client access and engagement in SNAP E&T and the program's impact on employment and training outcomes in the future.

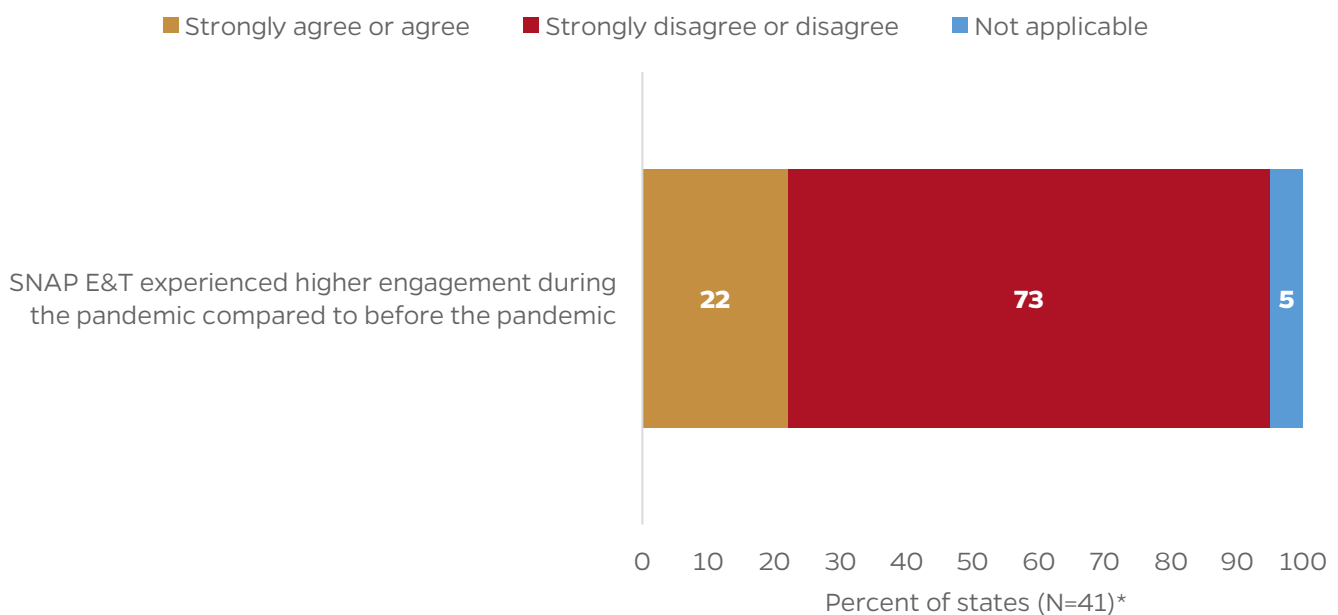
EXHIBIT 4.4.3. Resources Used by States During the Pandemic to Address the Need for Remote SNAP E&T Services



*States missing responses not included in denominator (n=5 for paper packets or workbooks, n=8 for pre-recorded courses, n=8 for telephonic services such as tutoring, n=10 for SMS text or app-based programming, n=5 for online meetings, and n=6 for virtual reality trainings).

Note: Other resources included (1) virtual job fairs; (2) remote case management; (3) job readiness sessions; (4) occupational training; or (5) education. Not all bars sum to 100% due to rounding.

EXHIBIT 4.4.4. Agreement That SNAP E&T Experienced Higher Engagement During the Pandemic Compared to Before the Pandemic



*States missing response not included in denominator (n=2).

SECTION 4.5. KEY FINDINGS

Communications and Customer Engagement

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

Having to manage numerous program changes simultaneously, states primarily relied on mass communication platforms to deliver information about changes such as interview adjustments, certification extensions, emergency allotment issuances, and availability of online purchasing. States commonly used websites and social media to deliver this information, with only a smaller subset of states conducting direct notifications via mail, phone calls, text messages or e-mail alerts. The tactics used by states to communicate changes and respond to inquiries appear to largely be driven by the existing tools in place prior to the pandemic. While very few states added new modes of communication during the pandemic, a larger subset expanded upon existing tools, including call centers, IVR systems, and inquiry forms. These data reinforce the challenge of building new infrastructure to support crisis response and the complexities of adapting client notifications in SNAP. Further investment in direct messaging capabilities, including alternatives to traditional mail, should be viewed as an important strategy for resiliency and preparedness for future emergencies.

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.

While they are two very different programs, the SNAP-Ed and SNAP E&T programs experienced similar shifts in services to address the need for virtual programming during the pandemic. In SNAP-Ed, most states moved at least some programming online, with a greater share of states with pre-existing online curricula making the shift to exclusively virtual service delivery. These services were delivered primarily through social media, pre-recorded lessons, and mailed materials and frequently included new curricula around public health. In SNAP E&T, most states conducted online meetings with clients, with others offering telephonic services, virtual reality trainings, and mailed paper packets or workbooks. States mostly did not change the type of SNAP E&T services provided, with the exception of some states adding or expanding supportive services to meet the increased need for equipment, typically in the form of loaner laptops and cell phones to assist with the shift to virtual services. Despite these adaptations, states felt that client engagement in both SNAP-Ed and SNAP E&T was lower than prior to the pandemic. In open-ended responses, some states described difficulty engaging SNAP E&T participants in a virtual setting, and others reported difficulty reaching existing SNAP-Ed clients through social media. While further research is needed to better understand the efficacy of remote SNAP-Ed and SNAP E&T services, state agency perspectives reinforce the importance of a multi-pronged approach to service delivery.

SECTION 5. REFLECTIONS AND FUTURE DIRECTIONS

Introduction

This section explores state reflections on the experience of implementing SNAP waivers and flexibilities during the pandemic. This section is organized to include:

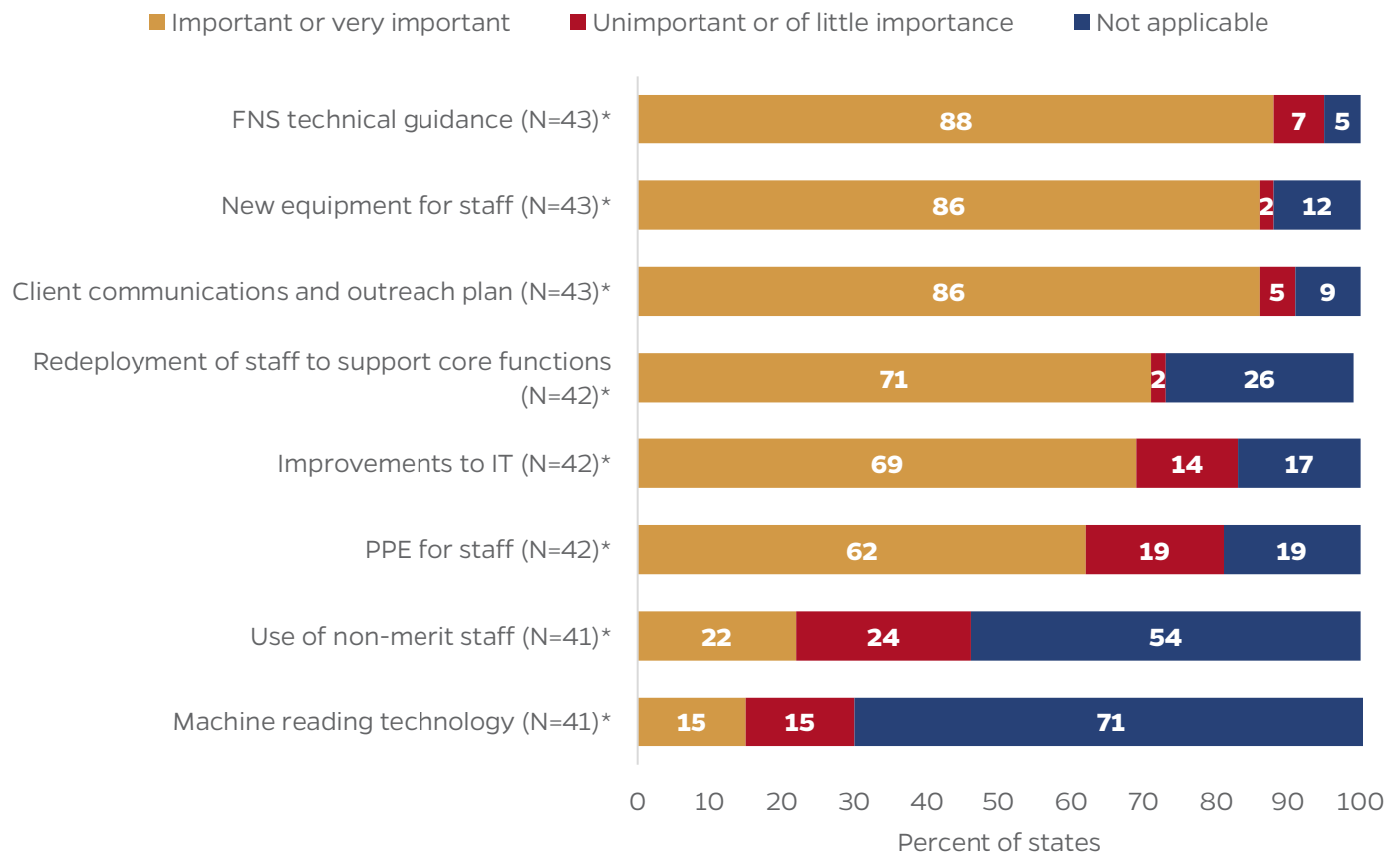
- A summary of state perceptions of facilitators and barriers to implementing SNAP flexibilities;
- An analysis of considerations for the use of program flexibilities in the future;
- An analysis of state perceptions of conducting interviews after the public health emergency ends; and
- A summary of other program modifications that states requested or would have preferred to request to improve equitable program access.

SECTION 5.1 REFLECTIONS

Facilitators and Barriers to Implementing SNAP Flexibilities

Within each program area explored in this report, states conveyed that a wide range of factors influenced their ability to make program adjustments in response to the pandemic. Looking more broadly at SNAP, **Exhibit 5.1.1** shows how states perceived the importance of various resources in implementing SNAP flexibilities. In adapting their services, three resources achieved consensus status as important facilitators of program flexibilities: technical guidance from FNS (88%), access to new equipment for staff (86%), and client communications and outreach plans (86%). Collectively, these three resources reflect the authority needed to make changes, the tools needed to implement them, and the information clients needed to understand the changes. Additionally, many states reflected that redeployment of staff to support core functions (71%), IT improvements (69%), and access to personal protective equipment for staff (62%) were important SNAP resources for the pandemic response. A smaller share of states viewed use of non-merit staff (22%) and machine reading technology (15%) as important. While fewer states viewed these resources as important in the pandemic response, this is not to say more states felt these resources were unimportant. Rather, more states felt these resources were not applicable to their pandemic response. This reaffirms previously explored survey results that showed fewer states had these program resources in place (or the means to put them in place) to be able to leverage them during the public health crisis.

EXHIBIT 5.1.1. Importance of Resources for Implementing Program Flexibilities



*States missing responses not included in denominator (n=1 for IT improvements, n=2 for non-merit staff, n=1 for PPE for staff, n=2 for machine reading technology, n=1 for redeployment of staff).

Note: Not all bars sum to 100% due to rounding.

“While it was understandable that FNS needed to review the new legislation to create guidance etc., the amount of delay on information for how the states could implement was detrimental to our ability to efficiently help clients.”

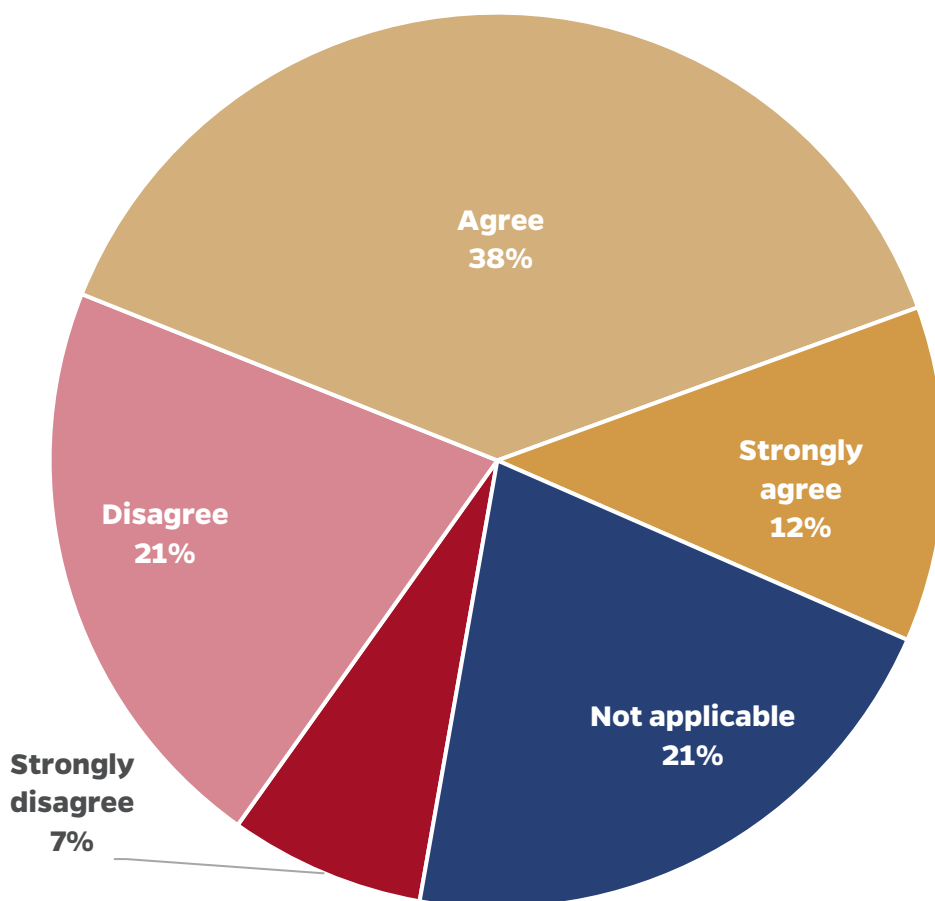
-State Survey Respondent

Exhibit 5.1.2 explores FNS technical guidance in greater detail. In open-ended responses and in response to questions about month-to-month reviews of interview and certification period waivers, states emphasized the importance of timely guidance and stated that late approvals impacted implementation of program modifications. When looking generally at their waiver submissions, 50% of states agreed or strongly agreed that they received an untimely approval or denial that negatively impacted implementation of a requested flexibility (Exhibit 5.1.2). These data raise important questions about how SNAP policies can be structured to facilitate expedited

implementation during times of crisis. The shift in authority for granting state waivers from requiring FNS approval (Families First Coronavirus Response Act - March 2020) to automatic

trigger of permissible flexibilities (Continuing Appropriations Act, 2021 and Other Extensions Act - October 2020) shows how Congress adapted over time to streamline states' pandemic response. However, the delayed implementation of such an approach reinforces the need for automatic triggers that can be enacted to support better planning and more rapid response in times of future national crises. These responses raise the question of whether federal policy can be codified to automatically trigger availability of critical flexibilities that states need to rapidly respond to clients' needs in future emergencies. Further, state responses reinforce the importance of Congress' shift in waiver authority as part of the October 2020 Continuing Resolution, which provided greater flexibility in how states made use of interview and certification period waivers without requiring pre-approval from FNS each month.

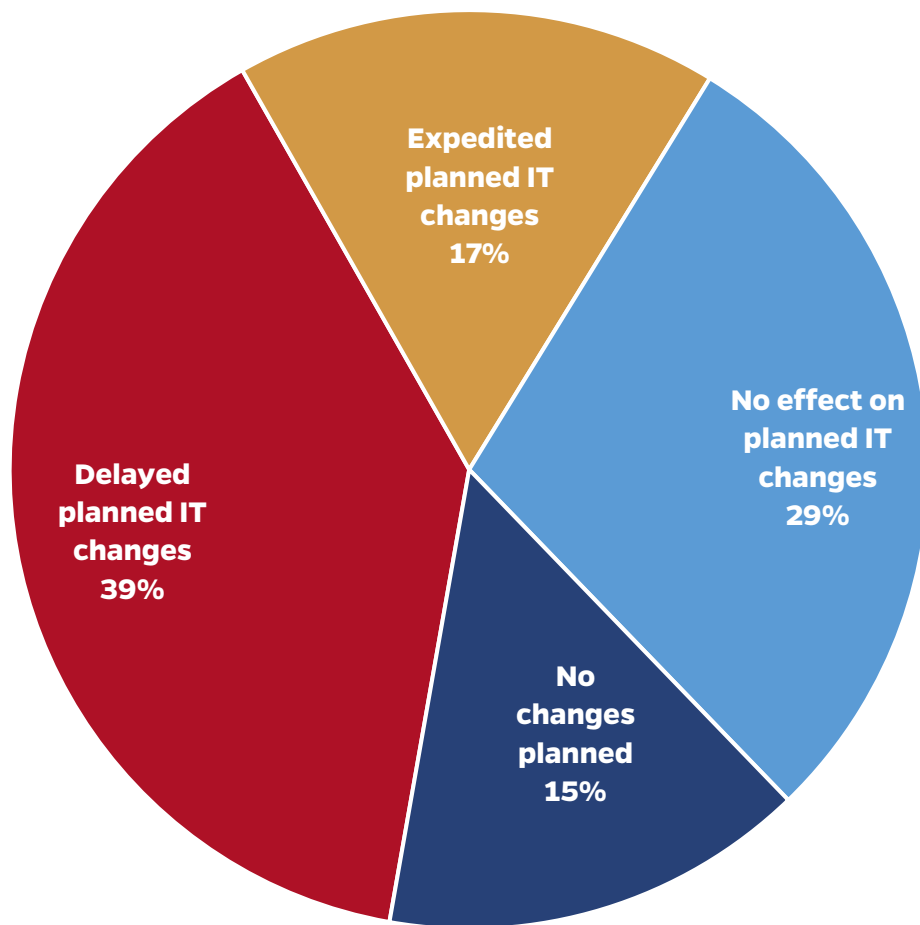
EXHIBIT 5.1.2. Agreement with the Statement: “My Agency Received an Untimely Approval or Denial from FNS That Negatively Impacted the Implementation of the Requested Flexibility” (N=42)*



*States missing responses not included in denominator (n=1).
Note: Pie chart does not sum to 100% due to rounding.

As discussed previously, many of the flexibilities and program adaptations made during the pandemic required IT and systems changes that caused additional administrative burden for states. **Exhibit 5.1.3** shows state perceptions of how IT systems changes needed to implement waivers impacted other planned IT changes for SNAP. State feedback shows that the pandemic delayed planned IT changes in some states (39%) while expediting it in others (17%). Open-ended responses provide a clearer picture of the disruption caused by the pandemic response, with some changes that helped manage SNAP flexibilities being expedited while other priorities were deferred.

EXHIBIT 5.1.3. Impact of IT Systems Changes Needed to Implement Waivers on the Timing of Other Planned IT Changes for SNAP (N=41)*



*States missing responses not included in denominator (n=2).

In addition to the many SNAP flexibilities implemented during the pandemic, state SNAP agencies were responsible for administering the Pandemic EBT (P-EBT) program. P-EBT was implemented by SNAP agencies in partnership with state education agencies and schools, authorized by Congress to provide children eligible for free- and reduced-price meals with food assistance benefits through EBT cards to offset missed meals while schools and childcare were

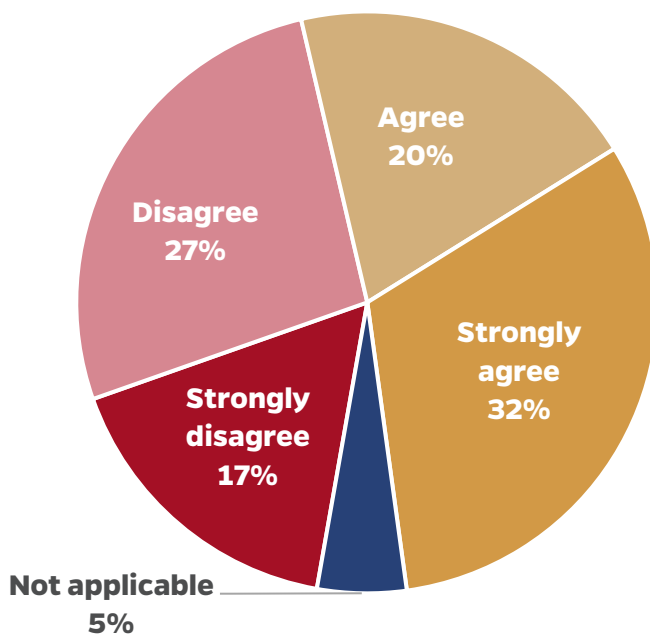
“We were denied recertification extensions for July, based [solely] on the number of new applications rather than the additional workload of P-EBT.”

-State Survey Respondent

disrupted. While implementation of P-EBT was not assessed as part of this project, states were surveyed to understand whether implementation of this significant new program in parallel to SNAP program changes affected SNAP case processing.

Exhibit 5.1.4 shows that more than half of states either strongly agreed (32%) or agreed (20%) that P-EBT implementation affected their ability to manage core functions for SNAP case processing. The impact of resources being diverted to support P-EBT is particularly relevant given open-ended responses from several states indicating that waiver denials from FNS during the summer months looked only at SNAP caseload trends and did not consider the added administrative burden of P-EBT. While this survey did not focus on P-EBT implementation, it is important to recognize that state agencies were navigating both how to implement this new program while also implementing various SNAP program flexibilities.

EXHIBIT 5.1.4. State Agreement with the Statement: “Implementation of P-EBT Affected Our Ability to Manage Core Functions for SNAP Case Processing” (N=41)*



*States missing responses not included in denominator (n=2).
Note: Bars do not sum to 100% due to rounding.

SECTION 5.2. FUTURE CONSIDERATIONS FOR PROGRAM FLEXIBILITIES

Flexibilities That Should Be Automatically Triggered During Future National Crises

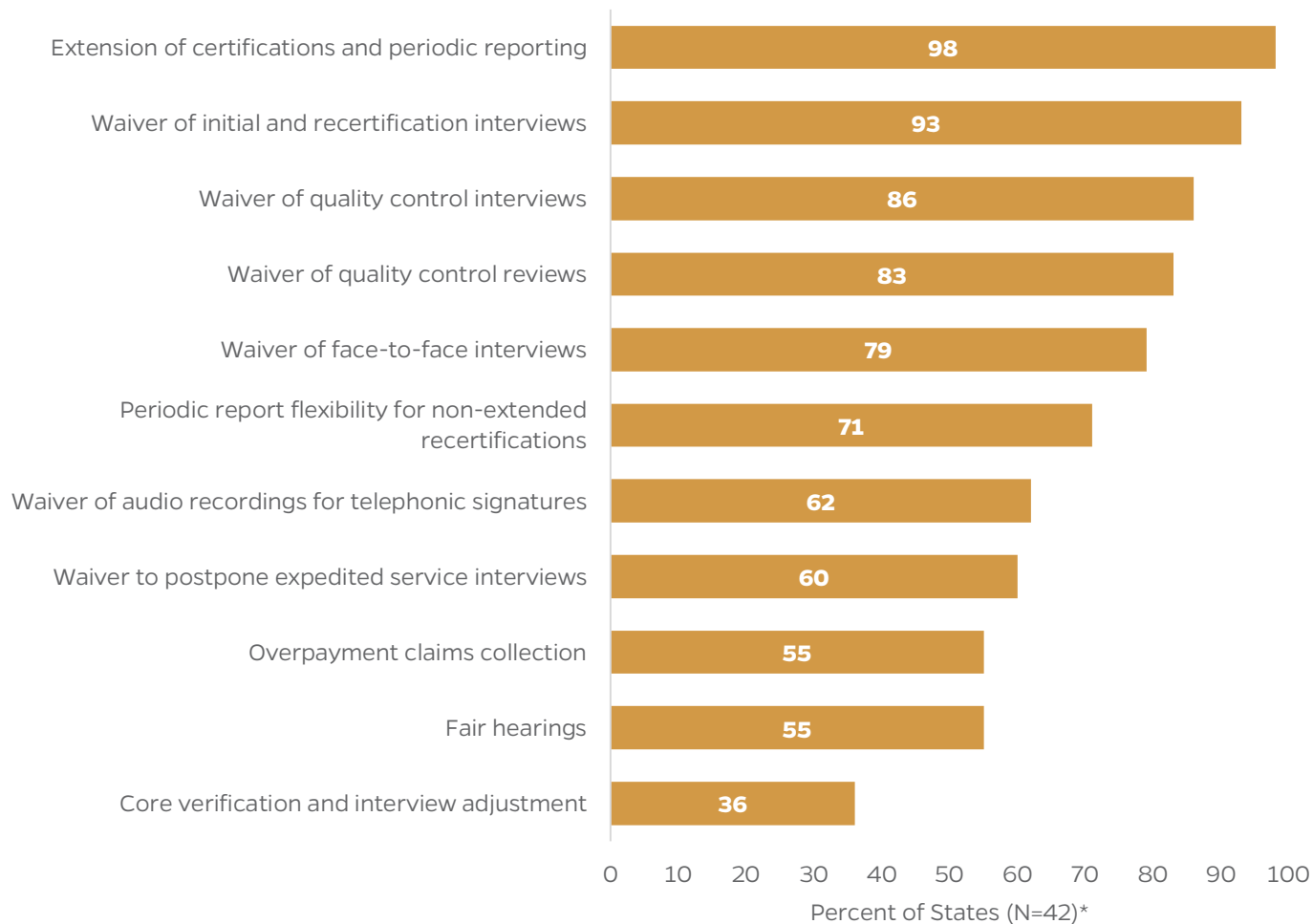
Given the extensive feedback states shared regarding challenges with the timing of SNAP guidance and waiver approvals during the pandemic, **Exhibit 5.2.1** shows which program waivers states believe should be automatically made available as an option in situations such as a public health emergency. States almost ubiquitously viewed the extension of certification periods (98%) and waiver of initial and recertification interviews (93%) as modifications that should be made available as an automatic option. As previously reported, states viewed these waivers as critical supports for managing escalating caseloads and ensuring new and sustained benefit access during the pandemic. Additionally, the vast majority of states supported the availability of a waiver of face-to-face interviews for quality control purposes (86%) and supported a waiver of quality control reviews (83%) in future emergencies, as were implemented for most of the pandemic.¹⁷ More than half of states responding to the survey supported an automatic trigger for the waiver of face-to-face interviews (79%), periodic reports for non-extended recertifications (71%), the waiver of audio recordings for telephonic signatures (62%), postponement of expedited service interviews (60%), delay of overpayment claims collection (55%) and extension of fair hearings timelines (55%). Fewer states (36%) preferred offering the less flexible waiver of core verification and interview adjustment. Collectively, these data signal strong support from states for automatic options for waivers that facilitate virtual services and that help families access and maintain benefits when traditional modes of application processing and communication are temporarily disrupted. Similarly, the data indicate state perceptions that highly prescriptive quality control review rules and requirements that carry the force of significant financial penalties are difficult to implement during these periods of disruption and should not dictate state decisions on benefit access or client and worker health and safety during a public health crisis.

>90%

of states viewed the extension of certification periods and waiver of initial and recertification interviews as modifications that should be made available as an automatic option in future emergencies.

¹⁷ The waiver of quality control reviews, which was authorized by Congress in the [Consolidated Appropriations Act, 2021](#), suspends reviews through June 2021.

EXHIBIT 5.2.1. Proportion of States Responding That Program Modifications Should Be Available as An Automatic Option in Certain Situations (N=42)*



*States missing responses not included in denominator (n=1).

Perceptions on Conduct of Interviews After the Public Health Emergency Ends

Separate from the question of which temporary waivers should be automatically available for future crises, states were also surveyed to gauge their preferred approach to conducting interviews as a standard course of business for normal program administration. Generally speaking, under normal circumstances households must be interviewed at both initial application and when eligibility is being recertified, with the option for an in-person or telephonic interview. As previously reported, the adjustment of these interview requirements was one of the most common and impactful waivers during the pandemic response. **Exhibit 5.2.2** shows that 33% of states believe that interviews should be conducted for all certifications and recertifications, but they do not need to be face-to-face. Roughly the same percent of states (31%) would prefer to always interview new applicants but only interview households due for recertification in certain circumstances, and 28% would prefer to only conduct

interviews at the request of clients or when questionable information merits further investigation. While previous research points to limited effects of interview demonstrations,¹⁸ more recent shifts in how customers interact with SNAP, combined with the widespread changes in interview procedures during the COVID-19 pandemic, point to the need for further investigation and testing of alternative approaches to conducting interviews and the impact of these approaches on program access. Furthermore, the significant interest among states to test new interview methods once the pandemic expires offers a natural opportunity to evaluate the benefits and challenges of interview adjustments through federal demonstration authority.

EXHIBIT 5.2.2. Preference for Conducting Interviews After the Public Health Emergency Ends (N=39)*

| Interview procedure | n (%) |
|---|----------|
| Interviews for all certifications and recertifications, but they do not need to be face-to-face | 13 (33%) |
| Always interview new applicants, only interview recertifications in certain circumstances | 12 (31%) |
| Interview only at client request or if questionable information merits further investigation | 11 (28%) |
| Face-to-face interviews for certain populations, other interview types for others | 2 (5%) |
| Face-to-face interviews for all certifications and recertifications | 0 (0%) |
| Interviews should never be required | 0 (0%) |
| Other | 1 (3%) |

*States missing responses not included in denominator (n=4).

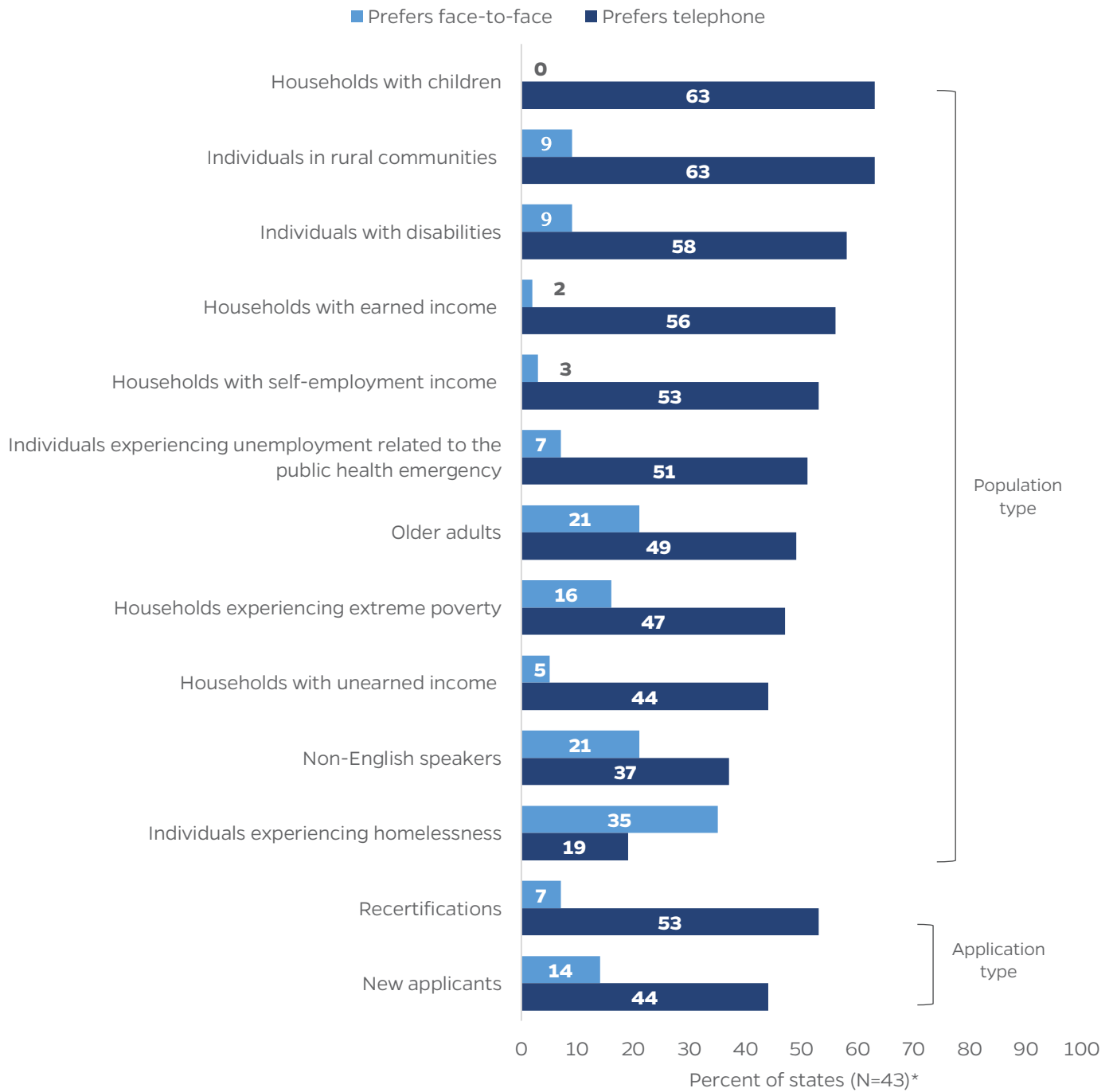
Customer Preferences on Interview Methods

Prior to the pandemic, all states surveyed provided the option to conduct interviews over the phone, yet during the public health crisis, this became the predominant method of interview across the country. **Exhibit 5.2.3** explores state agency perceptions of whether this shift may have had an adverse impact for certain members of the community served by SNAP that may prefer face-to-face interviews. States consistently believed that telephonic interviews were the preferred method of interview for almost all SNAP recipients and at both application and recertification. However, a greater share of states perceived that face-to-face interviews were preferred for individuals experiencing homelessness (35%), older adults (21%), and non-English speakers (21%). While research is needed that directly captures the preferences of individuals

¹⁸ Rowe, G., Gothro, A., Brown, E., Dragoset, L., & Eguchi, M. (2015). Assessments of the contributions of an interview to SNAP eligibility and benefit determinations: Final report. U.S. Department of Agriculture, Food and Nutrition Service. Retrieved from <https://fns-prod.azureedge.net/sites/default/files/ops/SNAPInterview.pdf>

receiving SNAP, these data indicate the potential inequities in the shift to virtual services and the need for continued face-to-face options for households in the long-term.

EXHIBIT 5.2.3. Perceptions of Client Preferences for Telephone and Face-to-Face Interviews



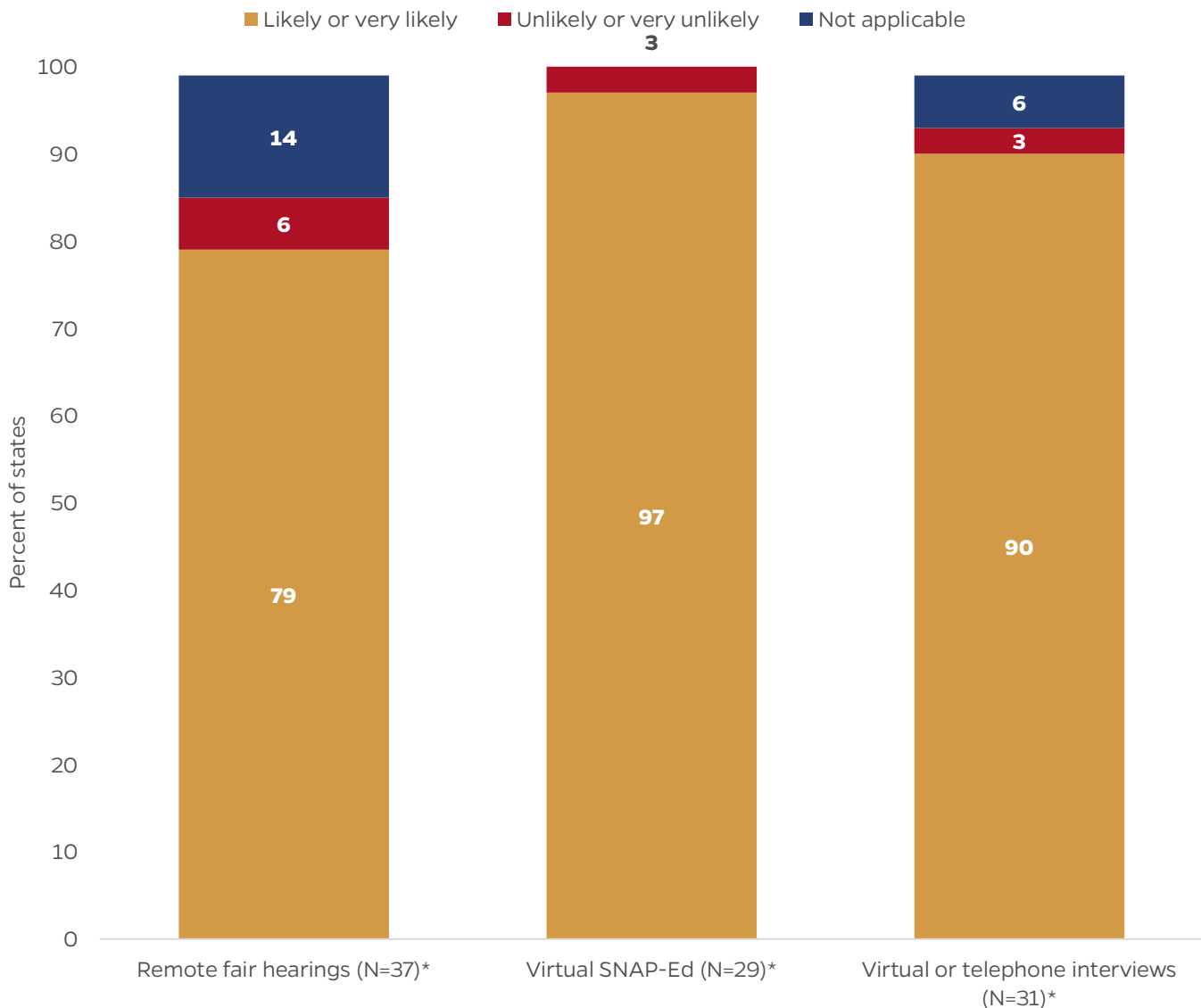
*Non-response included in the denominator.

Note: Values do not sum to 100% because states could indicate no preference for either option.

Planned Continuation of Remote or Virtual Services

Prior survey results capture the range of SNAP services that shifted to remote or virtual delivery during the pandemic, including interviews, SNAP-Ed, and fair hearings. **Exhibit 5.2.4** shows that all or nearly all states plan to continue conducting interviews and providing SNAP-Ed services remotely or virtually once the public health emergency ends and most (79%) plan to do so for fair hearings.

EXHIBIT 5.2.4. Likelihood of Continuing to Offer Program Flexibilities, if Extended



*States missing responses not included in denominator (n=2 for fair hearings, n=2 for virtual SNAP-Ed, and n=1 for virtual telephone interviews).

†Not all bars sum to 100% due to rounding.

SECTION 5.3. OTHER PROGRAM MODIFICATIONS TO IMPROVE EQUITABLE PROGRAM ACCESS

Requests for Additional Flexibility

Suspend Student Eligibility Requirements

At the end of the survey, states were asked to provide additional information about waiver requests that could have improved equitable access to SNAP but were denied. SNAP rules exclude college students from qualifying for assistance unless the individual is (1) under 18 years of age or 50 or older; (2) physically or mentally unfit; (3) receiving TANF; (4) employed for at least 20 hours per week; (5) participating in federal work study or an on-the-job training program, or; (6) responsible for a dependent household member under 12 years of age. Early in the pandemic, 31 states (data retrieved from FNS website) requested to adjust SNAP eligibility requirements for college students in several ways.¹⁹ First, states requested to waive the work requirements college students must meet to remain eligible to receive SNAP benefits. Second, states requested to include students studying remotely due to pandemic-related school closures in the benefit calculation for the household. Although more than half of states requested these student eligibility adjustments in response to the pandemic, FNS issued a mass denial in April of 2020, stating that the request, among other waiver requests, did not meet the requirements of approval under the FFCRA.²⁰ The Consolidated Appropriations Act 2021 addresses some of these concerns by temporarily expanding SNAP eligibility to include college students who are enrolled at least half-time and are either (1) eligible for work study or (2) have an expected family contribution of 0 in the current academic year. It is still unclear how these eligibility requirements will be determined and whether eligibility will be expanded to include students in other circumstances.²¹

Hot and Prepared Foods

SNAP rules restrict households from using SNAP benefits to purchase hot and prepared foods, such as rotisserie chickens and other foods intended for immediate consumption, although exceptions can be made for elderly, disabled, and/or homeless individuals in states that participate in the Restaurant Meals Program. Several states requested to expand this Program to temporarily cover all SNAP-eligible households; however, these requests were left unanswered by FNS. Whereas hot and prepared food waivers are frequently granted for disaster SNAP (D-SNAP) programs in response to natural disaster declarations, these requests were not granted under the auspices of the federal public health emergency declaration. In open-ended responses, states highlighted how significant disruptions to the food supply chain early in the pandemic limited access to many common staple ingredients for weeks and created additional burden on SNAP recipients already lacking adequate access to food.

¹⁹ U.S. Department of Agriculture, Food and Nutrition Services. (2021). SNAP-Other Waivers. Retrieved from <https://www.fns.usda.gov/disaster/pandemic/covid-19/snap-other-waivers>

²⁰ U.S. Department of Agriculture, Food and Nutrition Services. (10 April 2020). SNAP-Denial of Certain Requests to Adjust SNAP Regulations. Retrieved from <https://www.fns.usda.gov/snap/covid-19/denial-certain-state-requests>

²¹ U.S. Department of Agriculture, Food and Nutrition Services. (2021). SNAP Provisions in the Consolidated Appropriations Act, 2021. Retrieved from <https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP-Consolidated%20Appropriations%20Act%202021.pdf>

Other Requests

Other state responses generally aligned with information about waiver denials provided by FNS: many states requested to continue to extend recertifications or waive interview requirements in July and August of 2020, and to implement the initial waiver to extend certification periods differently from the method described in FNS' guidance.

“We were denied our waiver request to allow clients to purchase hot prepared meals from a grocery retailer. This was particularly important for elderly or homeless individuals when the grocery stores experienced an increased demand for food items, leaving many store shelves bare. The homeless population does not normally have access to cooking facilities to prepare canned or boxed food. We were also denied our request to waive student eligibility criteria. Adult students are historically underserved and it does not seem logical to deny public assistance to an individual who is taking steps to further their self-sufficiency.”

-State Survey Respondent

SECTION 5.4. KEY FINDINGS

Reflections and Future Directions

1. Federal policy that allows automatic triggers of waivers would help states' future SNAP pandemic responses.

States must follow a complex and prescriptive set of federal rules to implement SNAP. This dynamic results in federal policy having an outsized role in shaping state SNAP agencies' responses during times of crisis. While many states struggled to obtain timely and necessary approvals of certain waivers at different points in the pandemic, state agencies reflected on the need for a different path forward to support better planning and a more rapid response in future emergencies through automatic triggering of critical waivers. States overwhelmingly would like to see case processing waivers (certification, periodic reporting, and interview requirements) and quality control waivers (QC interviews and reviews) available as automatic options to take during future national emergencies. Consistent with state responses on the more flexible ways to apply case processing waivers through the Continuing Resolution from October 2020, states should have the ability to choose how to best apply these waivers in a manner that reflects state and local needs and program operations.

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

While most states utilized the waiver of initial and recertification interviews for at least part of the public health emergency, most states also continued to perform interviews in more targeted ways. Looking to the future, most states believe a more nuanced approach to interviews than the currently mandated application and recertification interviews would be best practice. However, perspectives on what the alternative approach should look like varies. Some states would prefer always interviewing new applicants, while others would prefer only conducting interviews at the request of clients or if questionable information merits further investigation. Whereas a prior FNS "no interview" pilot provided stricter rules on who could or could not be asked for interviews, the pandemic experience suggests that a more targeted approach that states could design would offer promise. Furthermore, the broad interest among a majority of states to consider alternative approaches could offer important insights by launching several demonstration projects parallel to each other as states transition from the public health emergency.

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

As grocery stores experienced empty shelves and colleges shut down early in the pandemic, states were unable to obtain waivers to permit the purchase of hot and prepared foods and to temporarily lift college student exclusion rules. While Congress ultimately acted in December 2020 to address the needs of college students, the inability to respond to the food access and insecurity needs generated by current food purchasing and college student rules highlights the need for action. Automatic triggers are needed to waive college student restrictions when universities are closed or work opportunities are unavailable, and to permit the purchasing of hot and prepared foods during events such as a pandemic, consistent with allowable activities set forth in D-SNAP programs.

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

P-EBT was a new program enacted through the FFCRA that allowed states to provide benefits to households with children to make up for meals missed due to school closures. Implementation required close collaboration between SNAP administrative agencies and school meal programs, as well as tremendous effort and creativity to identify eligible children, deliver benefits, design and staff a new program infrastructure, and create new policy to govern the program. States were expected to split the administrative costs of P-EBT implementation with the federal government and did not receive additional resources to support SNAP during this time. Almost half of the states responding to our survey reported that P-EBT made it difficult to implement SNAP flexibilities. Some states reported that implementation of P-EBT was not considered in requests for waivers intended to reduce the workload of SNAP eligibility staff early in the pandemic, when P-EBT was first rolling out. While this survey only asked one question about P-EBT, and the project overall is focused on state agency implementation of SNAP program flexibilities during the pandemic, other research has been, and continues to be, conducted to understand the impact that P-EBT had on both state agencies and clients.^{1,2}

¹ Neuberger, Z., Fitzsimmons, C., Rosenbaum, D., & Melcher Philbin, E. (2020). Lessons from early implementation of Pandemic-EBT: Opportunities to strengthen rollout for school year 2020-2021. Retrieved from <https://www.cbpp.org/sites/default/files/atoms/files/10-8-20fa.pdf>

² Center on Budget and Policy Priorities, Food Research & Action Center. (2020). Report: Pandemic EBT implementation project. Retrieved from <https://frac.org/wp-content/uploads/P-EBT-Documentation-Report.pdf>

DISCUSSION

KEY FINDINGS AND RECOMMENDATIONS

State agency perspectives on SNAP waivers and flexibilities used during the pandemic provide valuable insight into the key federal actions that helped preserve program access, the impact of the timing and structure of waivers on their effectiveness, the ways existing staffing and technology shaped states' SNAP pandemic responses, and lessons learned for future SNAP policy. This section of the report discusses key findings from the survey and provides preliminary recommendations for how to strengthen SNAP program access based on the experiences of state agencies during the pandemic.

KEY FINDINGS

1. Federal Waivers and Flexibilities Were Essential to Help SNAP Agencies Respond to the Unprecedented Impacts of the Pandemic

The actions taken by Congress and FNS to adjust SNAP program rules in response to the public health emergency were paramount to preserving program access in the immediate and long-term pandemic response. Consistent with past economic downturns, SNAP participation was the canary in the coal mine that would signal the extraordinary economic shock from the initial wave of the pandemic; the nearly six million-person increase in SNAP receipt from February to May reflects the single largest increase in assistance over a three-month period in the program's history.²² In the subsequent months, as the nation grappled with ongoing health and economic disparities, SNAP caseloads remained at or near this peak.

State survey responses provide strong evidence that the administrative flexibilities made available were critical to help states manage increased caseloads while adapting program rules and business processes. States agreed that federal guidance was important for implementing needed program flexibilities and reinforced that in the shift to remote case processing, waivers were commonly needed both to alleviate operational constraints and to ensure equitable access to SNAP services. Whereas some economic support programs struggled to respond to increased levels of need and adapt to new rules and modes of operation, the SNAP pandemic response was largely successful and reinforces the essential role that SNAP plays in supporting the health and well-being of families and communities in times of crisis.

²² U.S. Department of Agriculture Food and Nutrition Services. (2021). Supplemental Nutrition Assistance Program. Retrieved from <https://fns-prod.azureedge.net/sites/default/files/resource-files/34SNAPmonthly-3a.pdf>

2. Challenges with the Timing, Design, and Limitations of Waivers had a Significant Impact on SNAP Implementation

While federal waivers helped states through the pandemic response, issues with how and when waivers were made available resulted in avoidable challenges in SNAP administration in many states, impacting client services. The design of early waivers made available by FNS to extend recertification and periodic reporting due dates uniformly for a six-month period created foreseeable caseload bottlenecks in later months despite requests from states to adopt alternative approaches to certification extensions. Many states continued to struggle with the effects of this policy as of the date this survey was administered. As the pandemic endured through the summer of 2020, states encountered increasing obstacles to accessing critical waivers the way they needed them, with FNS rejecting many state requests to adjust interviews or extend certification periods only to reverse course and provide approval days before, or sometimes after the start of the month of requested implementation. Alternative waiver options for more limited interview adjustments offered for September 2020 received minimal interest from states due to the limited benefit and significant administrative burden associated with them.

Survey responses indicate that these challenges directly influenced many states' decisions on whether to request or continue waiver flexibilities over this time period. Additionally, open-ended responses routinely cited the month-to-month nature of waiver approvals as creating challenges for making the systems changes needed to implement the waiver and communicate with clients about program updates. This was particularly true for interview and certification waivers, but also for emergency allotments. Over time, Congress and FNS responded to the concerns raised by state agencies and other stakeholders. The Continuing Resolution passed on October 1, 2020 provided states much needed flexibility to select key waivers, including waivers of interviews, extensions of recertifications, and adjustments to periodic reporting, without prior approval from USDA. Further, the Continuing Resolution offered waivers over a multi-month time period and in a manner that more uniquely reflected states' administrative needs. The Consolidated Appropriations Act passed in December 2020 addressed longstanding state concerns about college student eligibility for SNAP during the pandemic. Similarly, FNS took action in April 2021 to reinterpret how emergency allotments could be used to provide assistance to households already at or near the maximum SNAP benefit amount. However, the lack of access to these flexibilities early in the pandemic proved problematic and policymakers should take heed of these lessons to more quickly equip states with the tools they need to respond to future crises.

3. Staffing and Technology Capabilities Pre-Pandemic Largely Constrained the Possible Tools Available During the Pandemic

During the pandemic, states were generally most successful in supplementing existing staff and technology to manage the increased demands of the pandemic rather than developing entirely new resources. For example, most states increased capacity to support application processing and case management by redeploying staff from other SNAP units or programs outside of SNAP rather than hiring new staff, non-merit staff, or building new call centers. Similarly, almost all states had tools in place to support remote applications prior to the pandemic, sometimes enhancing these systems during the pandemic; however, few states were able to build new infrastructure for virtual case functions, such as creating mobile-friendly applications or text messaging communication or developing automated tools like machine reading or intelligent scanning. Moreover, many states reported that the need to prioritize urgent IT updates to implement SNAP waivers and related program changes resulted in other planned improvements being delayed.

State responses point to the complexity of implementing major operational changes in SNAP during a crisis. New staff require extensive training before they are equipped to assist with case reviews and major technology investments require extensive planning and business process reengineering that takes time to design, develop, and implement. Looking toward the future, investments in SNAP infrastructure that support more nimble and efficient business processes and a human-centered experience for accessing services should be prioritized as a part of building a resilient federal system of supports that can respond in times of crisis. Recent Congressional action through the American Rescue Plan Act that appropriated additional administrative funds for SNAP agencies provides a potential down payment for states to begin making these much-needed investments.

4. SNAP Waivers and Program Changes Made by States Offer Important Lessons Learned for Future SNAP Administration

Despite the significant adversity states had to overcome to implement SNAP during the pandemic, several promising practices emerged that can be leveraged to improve future SNAP administration:

- States commonly agreed on several key waiver options that should be available as automatic triggers for future national emergencies, including extending certifications and periodic reporting, adjusting interview requirements, permitting telephonic signatures, and waiving quality control reviews. These waivers should be provided in such a manner that can be adapted to each state's operational needs and provides a time horizon for longer-term planning.

- Federal stakeholders should reexamine existing program rules that may unnecessarily complicate program access. For instance, only one-third of states reported that existing interview requirements at application and recertification are a best practice, with a majority preferring a more targeted approach to conducting interviews. Similar feedback was provided by some states in open-ended responses pertaining to audio recordings of telephonic signatures. Further understanding of alternative strategies can be explored through USDA demonstration authority as states transition out of the pandemic.
- States were successful in transitioning SNAP supportive services, including SNAP Outreach, SNAP-Ed, and SNAP E&T, to a remote environment, but the rapid transition to remote services came at a cost, as states struggled to maintain the same levels of client engagement as before. Virtual tools that engage customers in ways that are more convenient and flexible hold tremendous promise; however, many clients still require access to in-person services. More evidence is needed to understand how virtual service delivery influences client outcomes.

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 in which waivers to take and how to apply them to their 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 and save precious time early in their response when flexibilities are most greatly needed.

TEST PROGRAM CHANGES THAT INCREASE EFFICIENCY OR IMPROVE 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.

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

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 strengthens and improves 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.

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>

APPENDICES

APPENDIX A: STRENGTHENING SNAP THROUGH STATE INNOVATIONS SURVEY

The Strengthening SNAP through State Innovations Survey can be found [here](#).

APPENDIX B: SNAP FLEXIBILITIES TIMELINE

March 2020

- **3/13: National Emergency** – President Trump declared the COVID-19 pandemic was a national emergency.
- **3/13: Blanket Waiver: Quality Control (QC) Face-to-Face Interviews** – This waiver allowed the required face-to-face SNAP Quality Control interview to be substituted for a telephone interview in March, April, and May 2020.¹
- **3/18: Legislation: Families First Coronavirus Response Act (FFCRA) signed into law** – This legislation gave authority for Pandemic-EBT (P-EBT) through fiscal year 2020, suspension of work requirements for Able-Bodied Adults Without Dependents (ABAWDs) through the month after the month in which the national public health emergency expires, emergency allotments to SNAP households (later clarified by FNS as only for households that were not previously receiving the maximum monthly benefit), and adjustment of SNAP issuance methods, and application and reporting requirements (which FNS used to offer adjustments to certification periods, interviews, and a range of other administrative waivers).²
- **3/19: Blanket Waiver: QC Review Due Date Extension** – This waiver extended the due date by 45 days for SNAP Quality Control reviews for reviews originally due in December 2019 – February 2020.³
- **3/20: Blanket Waiver: Emergency Allotments** – FNS issued a template that states could complete to request an emergency allotment waiver to increase all SNAP households to the maximum benefit level for household size if they were not already receiving that level of benefits. States could apply for a two-month period of March/April or April/May 2020. States requesting alternative approaches that would provide emergency allotments to SNAP households already at the maximum benefit level were notified this is not allowable.⁴
- **Mid-March: Blanket Waiver: Extending Certification Periods and Adjusting Periodic Reports** – FNS issued guidance under FFCRA authority allowing states to extend certification periods and adjust periodic reports originally due in March-May 2020 by 6 months to September-November 2020.⁵
- **3/20: Guidance: P-EBT Plan Template** – FNS distributed a template for states to use to submit 2019 -2020 school year P-EBT plans.⁶
- **3/20: Guidance: Able-Bodied Adult Without Dependents (ABAWD) Time Limit Suspension** – FNS released guidance on temporary and partial suspension of ABAWD

work requirement as directed in FFCRA. The time limit is suspended through the month after the month in which the national public health emergency designation expires.⁷

- **3/26: Blanket Waiver: Interview Adjustment** – Under FFCRA authority, FNS provided states three options to adjust their interview practices through May 2020: waiving face-to-face interviews, waiving initial and recertification interviews, and postponing expedited service interviews.⁸
- **3/27: Legislation: Coronavirus Aid, Relief, and Economic Security (CARES) Act signed into law** – This legislation included additional appropriations for the SNAP program to address increased need.⁹
- **Mid-Late March: Individual Waiver: Telephonic Signature** – This waiver allowed states to document verbal attestation for eligibility in writing in place of the otherwise required audio recording to constitute a valid telephonic signature.¹⁰

April 2020

- **4/8: Online Purchasing Pilot Program** – California and Arizona become first states approved for Online Purchasing that were not in the original pilot project that was authorized in the 2018 Farm Bill. Other states that were not previously involved in the pilot then continued to submit plans to begin the program in their state so that SNAP customers can purchase food items online from certified retailers.¹¹
- **4/10: Waiver Denial: Mass Denial Letter for Student Eligibility, Emergency Allotments Above Maximum, Change of Circumstance, Expedited Applications, Verification Waivers for Evidence and Income** – FNS issued a mass denial notification for all state waivers that had been submitted for these areas.¹²
- **4/13: Blanket Waiver: Claims Collection** – This waiver allowed states flexibility in their time frame for establishing or disposing of new claims, and temporarily suspending collection or recoupment of SNAP overpayments through May 2020.¹³
- **4/13: Blanket Waiver: Fair Hearings** – This waiver allowed states flexibility regarding fair hearing time frames through May 2020.¹⁴
- **4/13: Guidance: Four Sets of Q&A: Payments and SNAP Outreach, SNAP-Ed, Waivers and Flexibilities, and SNAP E&T** – These sets of Q&A clarified adaptations permitted for SNAP-Ed, SNAP E&T, and SNAP Outreach, as well as guidance that additional unemployment insurance would be counted as unearned income, and that “Stay at Home” or “Shelter in Place” orders may be used as collateral contacts to verify job loss.¹⁵
- **4/15: Guidance: P-EBT Q&A** – This Q&A provided guidance around eligibility and issuance of Pandemic EBT benefits.¹⁶

- **4/21: Waiver Extension: Emergency Allotment Extension** – This waiver template allowed states to apply for emergency allotments for the next month as long as there is a state and federal public health emergency declaration during the month of the extension request.¹⁷
- **4/22: Waiver Extension: Extending Certification Periods and Adjusting Periodic Reports** – This extended the waiver to adjust periodic reports and extend certification periods due through June 2020 by six months.¹⁸
- **4/30: Blanket Waiver: Waiver of QC Review** – This waiver allows states to waive SNAP Quality Control reviews for active or negative cases for March, April, and May of 2020, and adjusts the minimum sample sizes to reflect the decrease in sample months.¹⁹

May 2020

- **5/15: Legislation: The Health and Economic Recovery Omnibus Emergency Solutions (HEROES) Act passes the House; stalls in the Senate** – The HEROES Act, which ultimately did not become enacted into law, included a 15% increase to maximum benefits, an increase in the minimum SNAP benefit from \$16 to \$30, a two-year suspension of the ABAWD work requirement time limit, exclusion of Pandemic Unemployment Compensation from counting toward SNAP eligibility, permission to purchase hot foods with SNAP, public availability of all requests, approvals, and denials of USDA waivers, and prevented implementation of the ABAWD, Broad-Based Categorical Eligibility (BBCE), and Standard Utility Allowance (SUA) proposed or final rules.²⁰
- **5/15: Waiver Extension:** FNS emails states new guidance that allows them to request extensions of certain waivers through June 2020. The extension included the following waivers:
 - Eliminate Interview at Certification and Recertification;
 - Postpone Expedited Service Interview;
 - Telephonic Signature;
 - Extend SSN Good Cause Period;
 - Suspend the Use of IEVS;
 - Temporary Suspension of Claims Activity;
 - Waive Fair Hearing Timeframes;
 - Extend ADH Timeframes;
 - Suspend In-Person Application and Verification Submissions;
 - Eliminate Face-to-Face Interview;
 - Revise Authorized Representative Requirements; and,
 - Waive QC Face-to-Face Interview.

- **5/21: Guidance: QC Review Waiver** – This Q&A provided guidance on several questions around the recent SNAP Quality Control blanket waiver, notably addressing that the waiver can only be used for the three months indicated.²¹

June 2020

- **June: Waiver Denials:** Multiple states received waiver denials for July 2020 and future months for interview waivers and adjusting periodic reports and certification periods. States were notified of waiver denials individually ranging from mid to late June.

July 2020

- **7/17: Waiver Extension: QC Face-to-Face Interviews** – This waiver extended the use of phone interviews in lieu of SNAP Quality Control face-to-face interviews through September 2020.²²
- **7/21: Waiver Extension: July and August 2020 extensions** – FNS Regional Offices emailed states letting them know that they can apply for waiver extensions for interviews and certification periods for July and August 2020, including if they had previously been denied for July and/or August. The email noted that any extensions beyond August will be “on an extremely limited basis.”

August 2020

- **8/3: Blanket Waiver: Core Verification and Interview Adjustment** – FNS provided states a modified waiver option, available starting in September and through December 2020, that allowed states to waive interviews for up to 50% of non-elderly or disabled households.²³
- **8/7: Fall Tiered COVID Adjustments and Waivers** – FNS sent an email to states stating that the waivers to Extend Certification Periods and Waive Periodic Reports, Eliminate the Interview at Certification and Recertification, and Postpone Expedited Service Interviews would only be approved on an “extremely rare” basis, and that the following “tiered” adjustments and waivers would continue to be approved at the regional level:
 - Telephonic Signature;
 - Extend SSN Good Cause Period;
 - Suspend the Use of IEVS;
 - Temporary Suspension of Claims Activity;
 - Waive Fair Hearing Timeframes;
 - Extend ADH Timeframes;
 - Suspend In-Person Application and Verification Submissions;
 - Eliminate Face-to-Face Interview; and,
 - Revise Authorized Representative Requirements

- **8/13: Blanket Waiver: Periodic Report Flexibility for Non-Extended Recertification Cases** – FNS provided new waiver option that may be used instead of the Core Verification and Interview Adjustment waiver that would allow all cases due for recertification in September 2020-December 2020, and had not previously been extended, to be treated as periodic reports instead of recertifications.²⁴
- **8/25: Waiver Extension: QC Face-to-Face Interviews** – This waiver extended the use of phone interviews in lieu of SNAP Quality Control face-to-face interviews through December 2020.²⁵

September 2020

- **9/2: Waiver Extension: QC Due Date Extension** – This waiver extended the due date by 45 days for SNAP Quality Control reviews for June 2020, which created a new 160-day deadline.²⁶

October 2020

- **10/1: Legislation: Continuing Appropriations Act, 2021, and Other Extensions Act signed into law** – This Continuing Resolution (CR) provided state SNAP agencies the option to extend certification periods up to six months through June 2021, follow periodic reporting requirements in lieu of recertification rules through December 2021, and/or provide interview adjustments for some or all households through June 2021 without prior approval from the Secretary of Agriculture. It also extended the waiver to suspend SNAP Quality Control reviews through September 30, 2021. Finally, the bill extended the authority of P-EBT through fiscal year 2021, expanded it to include children in childcare, and provided 100% federal reimbursement for all P-EBT administrative costs.²⁷

November 2020

- **11/16: Guidance: P-EBT** – FNS posted guidance and state plan templates for P-EBT for the 2020-2021 school year.²⁸
- **11/23: Guidance: QC Reviews** – FNS posted guidance on the SNAP Quality Control review waiver authorized in the Continuing Appropriations Act, 2021, and Other Extensions Act.²⁹

December 2020

- **12/14: SNAP WAIVERS AND FLEXIBILITIES RESEARCH SURVEY OPENED**
- **12/21: Legislation: Consolidated Appropriations Act, 2021, and Other Extensions Act signed into law** – This legislation authorized a 15% increase to the maximum SNAP benefit levels from January 1, 2021 – June 30, 2021, shortened the waiver of Quality

Control reviews to be extended through June 30, 2021 (instead of the prior September 30, 2021 date), excluded Pandemic Unemployment Compensation from Countable Income, and expanded SNAP eligibility for college students to include those that are eligible for work study and/or have an expected family contribution of \$0. In addition, the bill appropriated \$100 million in SNAP administrative funds and \$5 million for online purchasing and EBT technology. The bill also clarified simplifying assumptions and administrative fund allowances for P-EBT.³⁰

January 2021

- **1/29: SNAP WAIVERS AND FLEXIBILITIES RESEARCH SURVEY CLOSED**
- **1/29: Guidance: P-EBT** – FNS posted updated guidance and state plan templates for school-aged children and children in childcare for school year 2020-2021.^{31,32}

February 2021

- **2/2: Guidance: College Student Eligibility** – FNS posted guidance on the expanded eligibility for college students.³³
- **2/17: Guidance: SNAP Benefit Increase** – FNS posted guidance on the temporary SNAP benefit increase authorized in the Consolidated Appropriations Act and the exclusion of Pandemic Unemployment Compensation payments from SNAP income.³⁴

March 2021

- **3/11: Legislation: American Rescue Plan Act of 2021 signed into law** – This legislation extended the 15% SNAP benefit increase through September 2021 and allocated an additional \$1.15 billion in administrative relief for state SNAP agencies. The bill also appropriated \$25 million for technology improvements in online purchasing, mobile capabilities, and modernizing EBT. In addition, the bill expanded the authority of P-EBT to include summer benefits for all children eligible for free- and reduced-price meals and authorized the program for any future school year affected by COVID-19 and the summer thereafter.³⁵

April 2021

- **4/1: Guidance: Emergency Allotments** – FNS released new guidance that replaced the original emergency allotment guidance, permitting all households (including those already receiving the maximum benefit for their household size) to be eligible for an emergency allotment of at least \$95 per month as long as a state and federal public health emergency declarations are in place. It also permitted states to continue emergency allotments for one (1) month after the expiration of a public health emergency.³⁶

- **4/26: Guidance: Summer P-EBT** – FNS posted guidance and a template for Summer P-EBT plans.³⁷
- **4/29: Guidance: Administrative Funding** – FNS posted guidance for states on the administrative funding authorized in the American Rescue Plan Act and encouraged investments in technology, call centers, infrastructure and customer service, improvements to service delivery, reporting systems, and online capabilities.³⁸
- **4/30: Guidance/Waiver Extension: Waivers** – FNS posted guidance allowing states to continue SNAP administrative waivers through December 31, 2021 or the end of the national public health emergency, whichever comes first. The guidance states that waivers can be authorized as follows. It also stated that these would be reevaluated in October 2021 and, if needed, states can submit additional extension needed beyond December 2021 in October.³⁹
 - Waivers authorized under FFCRA can be approved for up to 8 months (through December 2021) with state confirmation of a state emergency or disaster declaration on 3-month intervals. These waivers include:
 - 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.
 - Waivers authorized under 7 CFR 272.3(c)(1)(i) will be approved for up to 8 months (through December 2021) with a national public health emergency declaration. These waivers include:
 - Temporary Suspension of Claims Activity;
 - Waive Fair Hearing Timeframes; and,
 - Extend Administrative Disqualification Hearing (ADH) Timeframes.
 - Waivers under the Continuing Resolution will be approved for up to 6 months (through December 2021) with state confirmation of a state emergency or disaster declaration on 3-month intervals. These waivers include:
 - 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); and,
 - 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.
 - 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.

- **4/30: Guidance/Waiver Extension: QC Review Resumption** – FNS posted guidance regarding the resumption of regular SNAP Quality Control operations in July 2021 and provided information on special review procedures due to recent COVID-related legislation. The guidance also included a blanket waiver for SNAP Quality Control face-to-face interviews from July-December 2021.⁴⁰

APPENDIX C: GLOSSARY

Blanket Waiver

A blanket waiver means that a waiver was offered to all states, and thus states must notify FNS of their intent to select the waiver but does not require more detailed justification for approval. As such, the waiver must be approved as is and cannot be modified by the state. Blanket waivers may only cover the particular time period offered by FNS and cannot be extended further without a separate request.

Bots/Robotic Process Automation

Some states use bots or robotic processing technology to assist in application processing. This technology emulates human actions interacting with digital systems and software. Bots can perform a wide range of defined actions, like reading what is on a screen, completing keystrokes, and extracting data from applications.

Case Management

When a household applies for SNAP or other human services benefits, information about the household is entered into a case management system that helps case workers keep track of it. Case management includes management of benefit issuance, periodic reporting, recertification, and other needs of the household.

Certification Periods

Once a client is approved for SNAP, the client's case will be approved for a certain period of time — typically 6 or 12 months. The maximum certification period for most households is 12 months, and 24 months for households that include a senior or a person with a disability.⁴¹

Extending Certification Periods and Adjustment of Periodic Reporting (Waiver)

This waiver allowed states to extend certification periods and periodic reporting requirements by six months, meaning that the case would remain active without requiring any additional paperwork or verifications.⁴²

Client Attestation

This is a client's confirmation that the information they provided on their SNAP application is accurate and truthful to the best of their ability and knowledge.

Collateral Contact

In order to verify certain information in a SNAP application, states are permitted to collect verbal or written confirmation by a third party who has firsthand knowledge of the client's circumstances. This is referred to as using a "collateral contact". During the pandemic, "Stay at Home," "Shelter in Place," or comparable orders were added to the approved list of collateral contacts to verify job loss.⁴³

Core Verification and Interview Adjustment (Waiver)

This waiver was offered in August 2020 and permitted state agencies to conduct streamlined interviews for at least 50% of non-elderly or disabled households. This waiver was intended to help states transition back to conducting 100% of interviews.⁴⁴

Document Submission/Upload

For a SNAP application to be complete, supporting documents must be uploaded or submitted to verify the client's identity, address, income, immigration status, resources, and expenses.⁴⁵

Elderly Simplified Application Project (ESAP)

This is a previously authorized demonstration project that streamlines the application and certification process to increase participation in SNAP among elderly populations.⁴⁶

Emergency Allotments

The Families First Coronavirus Response Act (FFCRA) included legislation that authorized state issuance of emergency allotments, which provided supplemental SNAP benefits to raise participants to the maximum benefit level for their household size.⁴⁷

Electronic Benefits Transfer (EBT)

An electronic system that allows SNAP participants to use a card similar to a debit card to purchase approved foods with their SNAP benefits.⁴⁸

Expedited Service

Households that are deemed to be in "immediate need" (have less than \$150 in monthly gross income and \$100 or less in liquid resources, combined monthly gross income and liquid resources amount to less than monthly rent or mortgage, or are a migrant or seasonal farmworker with little or no income at time of application) are entitled to receive benefits within seven days of initial application. States may follow special procedures to establish eligibility within the required timeframe for households eligible for expedited service.⁴⁹

Fair Hearings

SNAP beneficiaries may appeal decisions made by the state and request a fair hearing, which is a formal process in which the client's case is heard and a decision is reached. USDA regulation requires that state agencies conduct hearings, reach a decision, and notify the household within 60 days of receipt of a request.

Adjustment of Fair Hearings (Waiver)

During the pandemic, this waiver permitted state agencies to extend their fair hearings processes by up to 120 days and extend the time frame for sending notices by up to 30 days for fair hearings requests that were in process at the time of waiver approval or received during the month of the waiver approval.

Food and Nutrition Service (FNS)

The Food and Nutrition Service, an agency of USDA, works to end hunger and obesity through the administration of 15 federal nutrition assistance programs, including the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), Supplemental Nutrition Assistance Program (SNAP), and National School Lunch Program (NSLP).⁵⁰

Integrated Eligibility System

Many states use some form of an integrated eligibility system to jointly administer and/or manage SNAP and other human services programs such as Temporary Assistance for Needy Families (TANF), Medicaid, and the Low-Income Home Energy Assistance Program (LIHEAP).⁵¹

Integrated Voice Response (IVR)

An automated phone system technology that allows incoming callers to access information via a voice response system of pre-recorded messages and utilize menu options via touch tone keypad selection or speech recognition to have their call routed to specific departments or specialists.⁵²

Interviews

One component of the SNAP application and recertification process is an interview, during which a caseworker will verify with the applicant their household's eligibility for benefits.⁵³

Waiver of Initial and Recertification Interviews

During the pandemic, state agencies were offered a waiver to adjust interview requirements by not requiring a household to complete an eligibility interview prior to approval if the applicant's identity had been verified and all other mandatory verifications were complete.⁵⁴

Waiver of Face-to-Face Interview

During the pandemic, state agencies were offered a waiver to adjust interview requirements 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.⁵⁵

Postpone Expedited Service Interviews (Waiver)

During the pandemic, state agencies were offered a waiver to adjust interview requirements 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.⁵⁶

Intelligent Scanning

This type of scanning allows the computer to read the data fields on the paper document and input them directly into the SNAP eligibility system in order to avoid manual data entry. Typically, this type of software only works on predetermined document types.

Joint Applications

A joint application combines the SNAP application with another social service program application, such as Medicaid, Temporary Assistance for Needy Families (TANF), the Low-Income Home Energy Assistance Program (LIHEAP), Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), and Refugee Medical and/or Cash Assistance.

Legacy System

This type of system has outdated computing software or hardware that is still in use by the state agency for SNAP case management.

Low-Income Home Energy Assistance Program (LIHEAP)

This program provides federally funded assistance in managing costs associated with home energy bills, energy crises, weatherization and energy-related minor home repairs.⁵⁷

Mass Denial

This refers to a circumstance in which FNS denies all state waiver applications related to a specific topic together as a group, rather than issuing individual denials.

Mass Change

These changes are made by the State or Federal government and have the potential to impact the entire caseload, or at least a significant proportion of the caseload. These changes do not require direct notifications to individual clients. During the pandemic, States commonly used this form of communication when implementing changes such as the issuance of emergency allotments.⁵⁸

Medicaid

This program provides health coverage to millions of Americans, including eligible low-income adults, children, pregnant women, elderly adults and people with disabilities. Medicaid is administered by states, according to federal requirements, and funded jointly by states and the federal government.⁵⁹

Modernized System

Computing software or hardware that has been recently updated for more efficient and organized SNAP case management.

Non-Merit Staff

These staff are vendors or private staff that are able to complete a variety of functions for SNAP agencies without being hired as an employee of the agency. SNAP is unique among federal programs in that law requires states to use merit system employees to certify applicant households and take related actions that impact eligibility.⁶⁰

Online Purchasing Pilot (OPP)

This is a program, originally authorized in the 2014 Farm Bill, that allows payment with SNAP for online grocery purchases in approved retailers and states.⁶¹

Overpayment Claims Collection

SNAP overpayment claims are established and collected against households that receive more benefits than they are entitled to receive due to an agency error or program violation.⁶²

Temporary Suspension of Overpayment Claims Collections (Waiver)

During the pandemic, FNS allowed state agencies flexibility in the time frame for establishing or disposing of new claims. States were not required to collect active recoupment of SNAP overpayments, were able to delay collection on newly established overpayments, and were not required to consider any payments delayed due to this suspension of SNAP regulations to be delinquent.⁶³

Pandemic Electronic Benefit Transfer (P-EBT)

A new nutrition support program created in response to the COVID-19 pandemic and led by state SNAP agencies in partnership with child nutrition agencies. The program provides benefits via an EBT card to families with children that would have otherwise received free or reduced-price school meals if schools had not been closed in response to the public health emergency.⁶⁴

Pandemic Unemployment Compensation (PUC)

As part of the Coronavirus Aid, Relief, and Economic Security (CARES) Act, PUC provided an additional \$600 per week to individuals who were collecting regular unemployment compensation. This program has been extended multiple times throughout the pandemic and the December COVID-19 relief bill exempt these benefits as counting toward income for purposes of SNAP eligibility.⁶⁵

Periodic Reports

Periodic reports gather information about any changes clients may have had that may impact benefit levels of eligibility since the last time they completed a certification or recertification for SNAP benefits. Periodic reports are required for households certified for longer than six months, with the exception of elderly and disabled households with no earned income that are certified for 12 months or less.⁶⁶

Periodic Report Flexibility for Non-Recertification Cases (Waiver)

During the pandemic, FNS permitted state agencies to use periodic reporting procedures instead of a full recertification process for households that had not had their certification periods previously extended through other adjustments.⁶⁷

Personal Protective Equipment (PPE)

This is equipment worn to minimize exposure to hazards that cause serious workplace injuries and illnesses. In the context of COVID-19, PPE may include a facemask, gloves, and goggles or a face shield.^{68,69}

Quality Control (QC)

This is a procedure to measure the accuracy of state eligibility and benefit determinations. Data are collected by randomly sampling households participating in SNAP each month, interviewing participants, and conducting a detailed examination of their household circumstances. Data collected from quality control reviews are also used for program improvement and analysis.⁷⁰

Waiver of Quality Control (QC) Reviews

During the pandemic, FNS determined that temporarily waiving the QC review was appropriate due to the COVID-19 Public Health Emergency. Upon issuance of this waiver, all QC reviews for the sample months of March, April, and May 2020 were cancelled, unless a state opts not to operate under the waiver.⁷¹

Waiver of Quality Control Interviews

During the pandemic, states were permitted to conduct telephone interviews in lieu of face-to face-interviews for SNAP Quality Control (QC) purposes.⁷²

Recertification

Clients must reapply to SNAP periodically to continue receiving SNAP. Certification periods may last for no more than 24 months for elderly or disabled households and no more than 12 months for other households. A little over a month before the end of the certification period, a client will be notified that they must reapply and provide any changes, such as income or members of the households, that could impact their benefits or eligibility.⁷³

Refugee Medical Assistance (RMA)/Refugee Cash Assistance (RCA)

The Office of Refugee Resettlement (ORR) provides short-term medical assistance and cash assistance to newly arriving refugees and other populations who do not qualify for Temporary Assistance for Needy Families (TANF), Supplemental Security Income (SSI), or Medicaid programs, but who meet the income and resource eligibility standards of these programs.⁷⁴

“Shelter-in-Place”/ “Stay-at-Home” Order

During the pandemic, states and territories issued mandatory stay-at-home/shelter-in-place orders as a strategy to reduce the community spread of COVID-19 by limiting population movement and close person-to-person contact outside the household.⁷⁵

SNAP-Ed

The nutrition education component of SNAP, providing funding for states to conduct nutrition education and create policy, systems, and environmental changes to support individuals and families in leading healthy lives.⁷⁶

SNAP Employment and Training (SNAP E&T)

The SNAP E&T program helps SNAP participants gain skills and find work. Through SNAP E&T, SNAP participants have access to training and support services to help them enter or move up in the workforce. These programs also help to reduce barriers to work by providing support services – such as transportation and childcare – as participants prepare for and obtain employment.⁷⁷

SNAP Outreach

FNS works with state and local agencies, advocates, employers, community and faith-based organizations, and others to reach out to eligible low-income people who are not currently participating in SNAP to share information about the nutrition benefits of SNAP, help them make an informed participation decision, and support them in signing up for SNAP.⁷⁸

Social Distancing (also known as Physical Distancing)

During the pandemic, individuals were advised to keep a safe space between themselves and other people. To practice social or physical distancing, people were advised to stay at least 6 feet apart in both indoor and outdoor spaces.⁷⁹

Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)

This is a federal nutrition support program that supports pregnant and post-partum women, infants, and children up to age 5 by providing supplemental foods, healthcare referrals, breastfeeding support, and nutrition education.⁸⁰

Temporary Assistance for Needy Families (TANF)

This is an economic support program designed to help low-income families with children achieve economic self-sufficiency. States use TANF to fund monthly cash assistance payments to low-income families with children, as well as a wide range of services.⁸¹

Telephonic Signatures

State agencies consider an application to be complete if it contains the client's name, address, and signature. Telephonic signatures are verbal signatures provided during a phone interview. A retrievable record (or audio recording) of the verbal assent and the information to which assent was given must be available for the signature to be valid.⁸²

Waiver of Audio Recordings for Telephonic Signatures

During the pandemic, FNS allowed state agencies 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.⁸³

Telework (also known as Telecommuting)

This is a work flexibility arrangement under which an employee performs their job duties and responsibilities from an approved worksite (i.e., one's home) other than the location from which the employee would otherwise work.⁸⁴

Virtual Private Network (VPN) Bandwidth

A virtual private network (VPN) establishes secure and encrypted connections to provide greater privacy. Bandwidth measures how much data can be sent over a connection in a given amount of time.⁸⁵

¹ <https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP-COVID-OC-Interview-Flexibility.pdf>

² <https://www.congress.gov/bill/116th-congress/house-bill/6201/text>

³ <https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP-COVID-OC-Due-Date-Extension.pdf>

⁴ <https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP-COVID-EmergencyAllotmentsGuidance.pdf>

⁵ <https://www.fns.usda.gov/snap/extending-certification-periods-and-adjusting-periodic-reports>

⁶ <https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP-CN-COVID-PEBTGuidance.pdf>

⁷ <https://fns-prod.azureedge.net/sites/default/files/resource-files/FFCRA-Impact-on-ABAWD-TimeLimit.pdf>

⁸ <https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP-COVID19-AdjustInterviewRequirements.pdf>

⁹ <https://www.congress.gov/bill/116th-congress/house-bill/748/text?q=%7B%22search%22%3A%5B%22coronavirus+aid+relief+and+economic%22%5D%7D&r=2&s=1>

¹⁰ <https://www.congress.gov/bill/116th-congress/house-bill/748/text?q=%7B%22search%22%3A%5B%22coronavirus+aid+relief+and+economic%22%5D%7D&r=2&s=1>

¹¹ <https://www.usda.gov/media/press-releases/2020/04/08/arizona-and-california-added-innovative-snap-online-pilot-program>

¹² <https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP-COVID19-Multiple-Adjustment-Denials.pdf>

¹³ https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP-COVID19-SuspendClaims_BlanketApproval.pdf

¹⁴ <https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP-COVID19-FHTimeFrameFlex-BlanketApproval.pdf>

¹⁵ <https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP-COVID-OA2.pdf>

¹⁶ <https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP-COVID-PEBTOA.pdf>

¹⁷ <https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP-COVID-EmergencyAllotmentsPhase2Guidance.pdf>

¹⁸ <https://fns-prod.azureedge.net/sites/default/files/resource-files/Extend-Certification-Periods-PR-June-2020.pdf>

¹⁹ <https://fns-prod.azureedge.net/sites/default/files/resource-files/Waiver%20of%20Quality%20Control%20%28OC%29%20Reviews%20for%20March%20April%20and%20May%202020%20Due%20to%20the%20COVID-19%20Public%20Health%20Emergency%20%20Blanket%20Approval.pdf>

²⁰ <https://www.congress.gov/bill/116th-congress/house-bill/6800>

²¹ https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP-Quality-Control-OA_05212020.pdf

²² <https://fns-prod.azureedge.net/sites/default/files/resource-files/OC-Face-to-Face-Interview-Waiver-7-17-2020.pdf>

²³ <https://www.fns.usda.gov/disaster/pandemic/covid-19/snap-core-verification-interview-adjustment>

²⁴ <https://www.fns.usda.gov/disaster/pandemic/covid-19/snap-periodic-report-flexibility-non-extended-recertification>

²⁵ https://fns-prod.azureedge.net/sites/default/files/resource-files/OC-Face-to-Face-Waiver-Extension-through-December_0.pdf

²⁶ <https://www.fns.usda.gov/snap/quality-control-due-date-extension-june-2020-case-reviews>

²⁷ <https://www.congress.gov/bill/116th-congress/house-bill/8337/text>

²⁸ <https://fns-prod.azureedge.net/sites/default/files/resource-files/P-EBT-Cover-Memo-Schools.pdf>

²⁹ https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP-OC_ContinuingResolutionOA.pdf

³⁰ <https://www.congress.gov/bill/116th-congress/house-bill/8337/text>

³¹ <https://fns-prod.azureedge.net/sites/default/files/resource-files/Pandemic%20EBT%20E2%80%93%20State%20Plans%20for%202020-2021%20Schools%20and%20Child%20Care%20January%202021%20Cover%20Memo.pdf>

³² <https://fns-prod.azureedge.net/sites/default/files/resource-files/Pandemic%20EBT%20State%20Plans%20for%202020-2021%20Schools%20and%20Child%20Care%20January%202021%20Attachment%201%20OA.pdf>

³³ https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP%20Student%20Provisions%20in%20the%20CAA%202021_Questions%20and%20Answers.pdf

³⁴ <https://fns-prod.azureedge.net/sites/default/files/media/file/Consolidated%20Appropriation%20Act%202021%20Temp.%20Increase%20and%20Exclusions%20OA.pdf#page=2>

³⁵ <https://www.congress.gov/bill/117th-congress/house-bill/1319/text>

³⁶ <https://fns-prod.azureedge.net/sites/default/files/resource-files/snap-covid-emergency-allotments-phase-3-guidance.pdf>

³⁷ <https://fns-prod.azureedge.net/sites/default/files/resource-files/2021-pandemic-ebt-summer.pdf>

³⁸ <https://fns-prod.azureedge.net/sites/default/files/resource-files/arp-sae-memo.pdf>

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