# States Are Using Much-Needed Temporary Flexibility in SNAP to Respond to COVID-19 Challenges



Since March 2020, states have been using temporary SNAP (food stamp) flexibility to provide emergency benefit supplements, maintain benefits to households with children missing school meals, and ease program administration during the pandemic. These options have allowed states to deliver more food assistance to struggling families, help manage intense administrative demands, and ensure that participants maintain much-needed benefits.

The far-reaching health and economic effects of COVID-19 and widespread business closures to limit its spread made it even more difficult for many low-income households to afford food and other needs. <u>Data</u> have shown a substantial number of families have reported difficulties affording adequate food and other basic needs at some point during the pandemic. SNAP is essential to helping these families put food on the table.

The Families First Coronavirus Response Act of March 2020 gave the Agriculture Department (USDA) authority to let states temporarily modify procedures to make it easier for families to continue participating in or apply for SNAP. Many of those temporary changes were extended by subsequent legislation and administrative action. Also, Families First temporarily suspended, nationwide, SNAP's three-month time limit on benefits for unemployed adults under age 50 without children in their home. In addition to provisions in the law, USDA encouraged states to use existing program flexibility to improve access to SNAP, such as by using online or telephone SNAP applications if they weren't already, or allowing participants to stay on SNAP without reapplying for the maximum amount of time allowed under program rules. Families First also included a temporary boost of emergency supplementary benefits and school meal replacement benefits, which were

## How to Find Out if You Can Get Help From SNAP

If you would like help from SNAP, contact your local human services office. The staff there will work with you to find out if you qualify. You may also find information and referrals by dialing 211 in most states.

- Find the phone number for your state's office
- Find your state's SNAP website
- Find a local food bank if you need food immediately

Notes: SNAP is often referred to by its former name, the Food Stamp Program. Your state may use a different name.

SNAP has <u>special rules</u> following natural disasters.

also extended and strengthened by subsequent legislation and administrative action from the Biden Administration.

#### **Benefit Enhancements**

Families First included two ways for states to raise benefits for many SNAP participants and other households experiencing falling income and rising food needs:

Provide SNAP households with emergency allotments. States can give SNAP households emergency
supplementary benefits; all states have used this option. (Originally, a Trump Administration interpretation of this
Families First policy left out the lowest-income SNAP households from these benefits when states began issuing
them in March 2020. The Biden Administration reversed this policy, and beginning April 2021 all households in
states with these benefits have received emergency allotments of at least \$95.)

USDA may approve states to provide these benefits as long as the federal government has declared a public health emergency and the state has issued an emergency or disaster declaration. The <u>Biden Administration</u> has stated that the federal public health emergency will remain in place through at least October 2022.¹ Some states have taken steps toward ending or have ended their state COVID-related emergency declarations, and a number of states have ceased issuing allotments.² Households experience a significant benefit cut when these allotments end. Figure 1 below shows the months for which these allotments have been approved through August 2022.

In addition to these allotments, the COVID relief <u>package</u> enacted in December 2020 included a 15 percent increase in SNAP's maximum benefit for January through June 2021; the American Rescue Plan Act, enacted in March 2021, extended that increase through September 2021. This increase — which applied in all states and territories participating in SNAP — amounted to about \$28 more in SNAP benefits per person per month, or just over \$100 per month in food assistance for a family of four.

Separately, and not related to the pandemic, in August 2021 USDA announced it had completed the congressionally mandated revision of the Thrifty Food Plan (TFP), the basis for SNAP benefits, which raised benefits for SNAP households in October 2021 (and for future years). This update, which will enable the program to provide benefits that more accurately reflect the cost of a healthy diet, raised the maximum SNAP benefits by 21 percent compared to what they would have been. Because the 15 percent SNAP benefit increase ended at the same time, in October 2021, households received a modest increase in their SNAP benefits. For example, a household of three receiving the maximum benefit (all households in states that are continuing to distribute emergency allotments) saw a \$42 increase in October compared to September 2021, from \$782 to \$835.

Replace lost school meals through P-EBT. Families First allowed states to provide meal replacement benefits
through SNAP, known as P-EBT, for households with children who attended a school that was closed beginning in
the spring of 2020 for at least five days and who otherwise would have received free or reduced-price meals.

Spring 2020 through September 2020: All states and territories eligible to provide these benefits (except for Guam) selected the option and issued these benefits by mid-summer 2020 to replace meals lost during the 2019-2020 school year. Families First allowed states to provide these benefits through fiscal year 2020 (which ended September 30, 2020), and 20 states chose to extend the benefits through August and September 2020 under this law.

2020-2021 School Year and Summer 2021: The government funding law enacted in October 2020 extended P-EBT through September 2021 and included some expansions, including extending the program to pre-schoolaged children and to some territories originally left out of P-EBT.<sup>3</sup> The December 2020 COVID relief package included additional simplifications. The American Rescue Plan allowed states to continue their P-EBT program during the summers and through the remainder of the public health emergency for children who miss out on school meals because of the pandemic, as well as clarifying that the expansion to certain children under age 6 applies to all territories as well as states.<sup>4</sup> Also, the Biden Administration strengthened P-EBT benefits and issued guidance incorporating further simplifications.

Nearly every state, Washington, D.C., Puerto Rico, the U.S. Virgin Islands, and the Commonwealth of the Northern Mariana Islands received approval and issued benefits for the 2020-2021 school year; most states were also approved to issue benefits for pre-school-aged children in addition to school-aged children. Almost every state was approved to provide benefits for summer 2021 to both school-aged children receiving free- and reduced-price school meals and children under age 6.5

2021-2022 School Year and Summer 2022: The Biden Administration also provided guidance for states to provide benefits for students in the 2021-2022 school year for students learning virtually due to COVID. Developing 2021-2022 state plans for school-aged children has been challenging for some states because they have to determine whether absences are COVID-related. USDA also issued updated guidance for child care plans that makes their approval fairly straightforward. For more detail on states' implementation of P-EBT for spring 2022 benefits, see "States Have an Important Opportunity to Address Childhood Hunger This Summer."

Table 1 shows the states with current or past P-EBT adoptions. P-EBT benefits may be issued retroactively once states are approved. States can submit plans for approval at any time. P-EBT doesn't require a state public health or emergency declaration, but it does require that a national public health emergency declaration related to the COVID pandemic be in effect during the school year.

While not through Families First, USDA also expanded access to a key flexibility for households to use their SNAP benefits. The 2014 farm bill created a <u>pilot program</u> for states to test the feasibility and outcomes resulting from allowing retailers to accept SNAP benefits for online food purchases. In 2019, New York became the first state to launch a pilot, joined by Washington State in January 2020 and three other states in March 2020 (Alabama, Iowa, and Oregon). All 50 states and the District of Columbia now have such a program. USDA lists the <u>retailers that accept SNAP online</u>.

### **SNAP Operations Waivers**

Families First and subsequent legislation allowed states to temporarily adjust their operations to help manage their workloads and help participants gain and maintain access to the program. Nationally, the number of SNAP participants grew from about 37 million in February 2020 to about 43 million in June 2020. The number of participants has fallen since, but in March 2022, the most recent data available, more than 41 million people participated — 12 percent more than the number of participants in February 2020. State SNAP agencies have had to manage this greater volume through office closures staffing shortages, and other challenges due a remote work environment during the pandemic. These temporary adjustments have been critical to help state SNAP agencies process applications and help keep participants connected to the program, as many state agencies reported in a 2021 survey.

Some states began transitioning off these flexibilities in the second half of 2020, as USDA <u>began</u> approving fewer extensions, but the October 2020 government funding law restored many of these options. USDA has <u>allowed</u> states to extend these flexibilities through the month following the end of the national public health emergency, though states must confirm that their state public health emergency declaration remains in effect every three months. This guidance also encourages states to use these flexibilities as needed to aid in the transition to regular operations, such as by applying the flexibility only to a portion of the caseload or reducing the number of households affected by the flexibility each month.

• Extend certification periods and adjust reporting requirements. SNAP participants get approved to receive benefits for a certain period, called a "certification period." Ordinarily, every month a portion of SNAP participants must submit paperwork and complete an interview to continue receiving benefits when their certification period ends; this is called the recertification process. Participants must also update or report certain changes in their circumstances at different intervals, depending on the state.

Most states requested and received this waiver through the initial months of the pandemic; some states stopped requesting waivers in the summer of 2020. Under December 2021 guidance, states may request to extend waivers available through the month after the month in which the federal public health emergency ends. Table 2 shows the expiration of states' most recent usage of this option.

• Waive interview requirements. SNAP rules require all households to be interviewed either in person or over the telephone by a state eligibility worker at initial application and usually at least once a year thereafter. This requirement can be an important way for states to gather accurate information and for applicants to have their questions answered, but it can be a labor-intensive task and delay approval. USDA has allowed states to dispense with the interview temporarily for many households, originally at both initial application and recertification, as long as state agencies verify identification and households provide mandatory verifications, such as of income. USDA also has allowed states to approve, without an interview, households that are entitled to shortened timelines for processing applications (known as "expedited processing") due to their very low incomes and resources, provided that state agencies verify the households' identity and attempt to contact them. Finally, USDA has allowed states to not offer in-person interviews and to waive the requirement that state agencies provide in-person interviews upon request from SNAP participants and applicants.

There is evidence that some states apply these flexibilities only to some SNAP households. For example, a 2021 <u>survey</u> of state SNAP agencies found that most continued to conduct interviews for some households, such as when information was missing or incomplete, even when they waived the interview requirement.

Over 40 states took up USDA's spring 2020 <u>nationwide waiver</u> of the required interview at the application or recertification stage to ensure that newly eligible households can access food assistance through SNAP and that those already participating can remain enrolled. Many states began transitioning off the waivers, but the October 2020 government funding law allowed states to implement the <u>original</u> versions of the waiver through June 2021 without requesting USDA approval, and many states began using this flexibility again. Under the December 2021 guidance, states may continue this flexibility through the month after the month in which the federal public health emergency ends. Table 2 shows the states extending this flexibility.

Adapt telephonic signature requirements. Before the crisis, many states had implemented technology to let
households apply for SNAP by phone, including using a stored telephonic signature. Current regulations require

states to record verbal assent in an audio file to ensure that there is a record of applicants understanding and agreeing to information gathered and used by the state worker. The waiver allows states to take SNAP applications by phone by allowing a state eligibility worker to document the household's attestation to the collected information on the client's behalf *without* requiring a recorded signature. This temporary step has helped states process applications in the pandemic environment, where offices have been closed in many states and not all clients can access online applications. USDA has continued to allow states to extend this waiver, as shown in Table 2.

Use periodic report procedures instead of the more extensive recertification process. SNAP participants are
required to provide updates about their circumstances at certain intervals; this is a much more streamlined
process than recertification, which requires an application and interview. This option, included in the October
2020 government funding law, allows states to extend this flexibility for households due to recertify through the
month after the month in which the federal public health emergency ends.

### **Other Administrative Options and Waivers**

In addition to extending approvals for states to use flexibility under existing SNAP regulations, USDA has approved and extended other waivers under Families First that temporarily suspended administrative requirements for states, not shown in the tables below. USDA has continued to let states request these options through the month after the month in which the federal public health emergency ends.<sup>6</sup> USDA also had introduced some limited options in the fall of 2020 meant to transition states to regular operations, but because the October 2020 government funding law restored many flexibilities that had been previously offered, states stopped using those narrower options.<sup>7</sup>

In addition, USDA has approved waivers to modify aspects of states' quality control processes. States must independently check the accuracy of household eligibility and benefit levels for a share of their cases each month. The process typically involves an in-person interview with households, often at their home. All states opted to use Families First's flexibility to conduct quality control interviews by phone instead of in person, which USDA made available through June 2022. USDA approved state extensions of the waiver through June 2020 for 49 states, approved extensions of the waiver for all states through December 2020, and notified states in April 2021 that they could request this waiver through December 2021. Also, in March 2020 USDA gave all states and territories participating in SNAP an extension of the deadlines for reporting findings from households that were reviewed in December 2019 through February 2020. USDA subsequently allowed all states and territories participating in SNAP to suspend these reviews for March, April, and May 2020. Later legislation suspended many requirements related to these reviews for June 2020 through June 2021, when they resumed.8

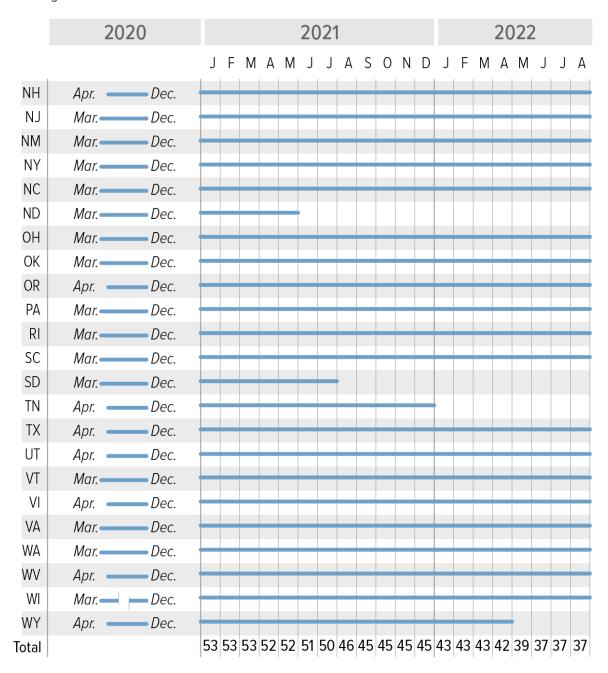
## State Emergency Allotments and Extensions by Month

As of August 2022



## State Emergency Allotments and Extensions by Month

As of August 2022



Note: States must have both a state and national public health emergency declaration to issue benefits. As of August 2022, 16 states had ended issuing emergency allotments. Because some states are typically approved later in the month for allotments, lack of approval for EAs in the most recent month does not necessarily indicate that they have been discontinued. Issuance dates vary by state and states may actually issue allotments in the next month or request an allotment near the end of the month. (For example, a state may not have been approved for a September allotment until the end of September.)

USDA issued guidance to change emergency allotments beginning in April 2021 to ensure that all SNAP households receive at least \$95 in allotments. (A previous policy under the Trump Administration left out some of the lowest-income SNAP households.)

For September 2022 updates and beyond, the Food and Nutrition Service updates emergency allotment extensions for the upcoming months as they come in on its website: https://www.fns.usda.gov/snap/covid-19-emergency-allotments-guidance.

TABLE 1
Pandemic EBT, as of August 16, 2022

State	Provided benefits for households with children missing school meals in 2019- 2020 school year <sup>1</sup> (P-EBT)	Provided P- EBT, August- Sept. 2020 <sup>1</sup>	Provided P- EBT to school- aged children, 2020-2021 school year <sup>1</sup>	Provided P-EBT to children under age 6, 2020- 2021 school year <sup>2</sup>	Provided P- EBT, summer 2021	Provided P- EBT to school-aged children, 2021-2022 school year	Provided P- EBT to children under age 6, 2021-2022 school year	Provided P- EBT, summer 2022
Alabama	Χ		Χ	Χ	Χ	, , , , , , , , , , , , , , , , , , , ,	X	X
Alaska	Х		Х	Х	Х			
Arizona	X		Х	Χ	Х		Х	Х
Arkansas	X		X	Х	Х	Х	Х	Х
California	Х	Х	X	Χ	Х	Х	Х	Х
Colorado	X		Х	Χ	Х	Х	Х	Х
Commonwealth of the Northern Mariana Islands <sup>3</sup>			Х	Х	Х			
Connecticut	Х		X	Χ	Х	Х	X	Х
Delaware	Х	Х	Х	Χ	Х	Х	Х	Х
District of Columbia	Х	Х	Х	Χ	Х		Х	Х
Florida	Х		X	Х	Х	Х		
Georgia	Х		X	Х	Х		Х	
Guam			Х		Х			
Hawai'i	X	Х	Χ	Χ	Х		Χ	X
Idaho	X		X		X*			
Illinois	X	Х	Χ	Χ	Х		Χ	X
Indiana	Χ	Х	Χ	Χ	Χ	Χ	Χ	Χ
Iowa	X		Χ	Х	Х			
Kansas	Χ		Χ	Χ	Х		Χ	X
Kentucky	Χ	Χ	Χ	Χ	Х	Х		X
Louisiana	Χ		Χ	Χ	Х	Х	X	X
Maine	Х		Х	Х	Х	Х		
Maryland	Х	Х	Х	Χ	Х	Х		Х
Massachusetts	Х	Х	Х	Χ	Х	Х	Х	Х

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State	Provided benefits for households with children missing school meals in 2019- 2020 school year¹ (P-EBT)	Provided P- EBT, August- Sept. 2020 <sup>1</sup>	Provided P- EBT to school- aged children, 2020-2021 school year <sup>1</sup>	Provided P-EBT to children under age 6, 2020- 2021 school year <sup>2</sup>	Provided P- EBT, summer 2021	Provided P- EBT to school-aged children, 2021-2022 school year	Provided P- EBT to children under age 6, 2021-2022 school year	Provided P- EBT, summer 2022
Michigan	Х		X	Χ	Х	Х	X	X
Minnesota	Х		X	Х	Х	Х	Х	X
Mississippi	Х		X		X*		Х	X
Missouri	Х		X	Χ	Х	Х		
Montana	Х	Х	X	Х	Х		Х	X
Nebraska	Х	Х	X	Х	Х	Х		
Nevada	X		X	Х	Х	Х	Х	X
New Hampshire	Х		X	Х	Х			
New Jersey	X	Х	Χ	Χ	Х		Χ	X
New Mexico	Х	Х	Χ	Χ	Χ	Х	Χ	X
New York	Х		X	Х	Х		X	
North Carolina	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ
North Dakota	Χ		Χ				Χ	Χ
Ohio	X	Х	Χ	Χ	Х	Х	Χ	X
Oklahoma	X		Χ	Χ	Х	Х	Χ	X
Oregon	Χ	Χ	Χ	Χ	Χ		Χ	
Pennsylvania	Χ		Χ	Χ	Χ	Χ		
Puerto Rico <sup>3</sup>			X	Χ	Х	Х	Χ	X
Rhode Island	X	Х	X	Χ	Х	Х		X
South Carolina	X		X	Χ	Х		Χ	X
South Dakota	Х		X	Χ	Х			
Tennessee	X	Х	X	Χ	Х	Х		
Texas	Х		X	Х	Х	Х	X	X
Utah	Х		Χ	Χ	Х	Х	Χ	X
Vermont	Х		Х	Χ	Х	Х	Х	X
Virgin Islands	Х	Χ	X	Χ	Х			
Virginia	Х	Х	X	Χ	Х	Х		Х

TABLE 1

#### Pandemic EBT, as of August 16, 2022

State	Provided benefits for households with children missing school meals in 2019- 2020 school year¹ (P-EBT)	Provided P- EBT, August- Sept. 2020 <sup>1</sup>	Provided P- EBT to school- aged children, 2020-2021 school year <sup>1</sup>	Provided P-EBT to children under age 6, 2020- 2021 school year <sup>2</sup>	Provided P- EBT, summer 2021	Provided P- EBT to school-aged children, 2021-2022 school year	Provided P- EBT to children under age 6, 2021-2022 school year	Provided P- EBT, summer 2022
Washington	Х		X	Χ	Х		Х	X
West Virginia	Х		Х	Х	Х	Х	X	X
Wisconsin	Х		Х	Х	Х	Х	X	X
Wyoming	Х		Х	Х	X	Х		
Total	52	20	55	51	54	33	36	37

Note: Please see the Food and Nutrition Service (FNS) website for the most current P-EBT approvals with any updates after the "as of" date listed: https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt.

¹The Families First law, which originally authorized P-EBT, authorized the program through September 2020 (fiscal year 2020). USDA originally approved states to provide benefits in the 2019-2020 school year for days when schools were closed, and approved extensions for states to provide benefits in August and September of the 2020-2021 school year under that law. The October 2020 government funding law extended this option through September 2021 and expanded the program by including schools using a mix of in-person and virtual learning and certain children under age 6 receiving SNAP benefits. The December 2020 COVID-19 relief package and further action from the Biden Administration allowed for further simplifications, particularly for children under age 6. States that were not originally approved to issue benefits for August and September 2020 under Families First may issue benefits for those months once approved for the 2020-2021 school year. All states that were approved after October 2020 for the 2020-2021 school year were approved to provide benefits dating back to the start of the school year for school-aged children. The American Rescue Plan allows states to provide P-EBT benefits during the summer of 2021 and throughout the COVID-19 pandemic.

<sup>&</sup>lt;sup>2</sup> States that were approved to issue benefits for children under age 6 for the 2020-2021 school year were approved to begin doing so in October 2020.

<sup>&</sup>lt;sup>3</sup> Puerto Rico, which operates a SNAP-like block grant in lieu of SNAP but participates in the child nutrition programs that the states participate in, was excluded from P-EBT under Families First. The October 2020 government funding law extended the option to Puerto Rico to participate in P-EBT in the 2020-2021 school year. American Samoa and the Commonwealth of the Northern Mariana Islands, which operate block grants in lieu of SNAP and receive separate grants for child nutrition programs, were also originally excluded but are eligible to implement P-EBT under the October 2020 law. The American Rescue Plan Act also clarified that the provisions extending the program to certain children under age 6 apply to those territories (Puerto Rico, Commonwealth of the Northern Mariana Islands, and American Samoa) as well as to states and territories participating in SNAP. Guam and the U.S. Virgin Islands participate in SNAP and have been eligible for all rounds of P-EBT.

<sup>\*</sup>States with an asterisk are states that only provided summer P-EBT benefits to school-age children (and not children under age 6) in 2021.

TABLE 2

## USDA-Approved SNAP Operations Waivers, as of July 18, 2022

Listed by last month option or waiver is in effect

State	Extend certification periods and adjust periodic reports	Waive initial/ recertification interviews	Not offer face-to-face interviews	Waive expedited interviews	Adapt telephonic signature requirements	Use periodic report procedures to recertify households
Alabama		Sep. 2022	Sep. 2022	Sep. 2022		
Alaska	Jul. 2022	Jul. 2022	Jun. 2020	Jun.2020	Aug. 2020	
Arizona	Jun. 2021	Jun. 2022	Jun. 2020	Jun. 2020	Jun. 2022	
Arkansas	May 2020	Jun. 2021	Jun. 2020	Jun. 2020	Oct. 2020	
California	May 2020	Sep. 2022	Dec. 2021	Jun. 2020	Sep. 2022	
Colorado	Jun. 2021	Jun. 2021	Jun. 2020	Jun. 2020	Jul. 2020	
Connecticut	Sep. 2022	Sep. 2022	Jun. 2021	Sep. 2022	Sep. 2022	
Delaware	Aug. 2020	Sep. 2022	Jun. 2020	Sep. 2022	Sep. 2022	
District of Columbia	Aug. 2022	Oct. 2022	Oct. 2020	Jun. 2020	Jul. 2020	Oct. 2022
Florida	Aug. 2020	Jun. 2021	Jun. 2020	Jun. 2021		
Georgia	Jun. 2022	Jun. 2022	Jun. 2020	Jun. 2020		
Guam	Jun. 2020	Jun. 2020				
Hawai'i	Dec. 2021	Jun. 2022	Jun. 2022	Jun. 2022	Jun. 2022	Dec. 2021
ldaho	May 2020					
Illinois	Sep. 2022	Sep. 2022	Dec. 2020	Jun. 2020	Sep. 2022	
Indiana	Jun. 2022	Aug. 2020	Jun. 2022	Aug. 2020		
lowa	Aug. 2020	Jun. 2020			May 2020	
Kansas	Jun. 2020	Dec. 2021	Jun. 2020	Jun. 2020		
Kentucky	Jun. 2021	Jun. 2021	Jun. 2020	Jun. 2021		
Louisiana	May 2021	Apr. 2022	Jun. 2020	Jun. 2020		Dec. 2020
Maine	Jun. 2020	Sep. 2022	Jun. 2020	Jun. 2020	Aug. 2020	
Maryland	Jun. 2022	Mar. 2022	Jun. 2021	Sep. 2022		Dec. 2021
Massachusetts	Nov. 2022	Nov. 2022	Jun. 2020	Nov. 2022	May 2021	Nov. 2022
Michigan	Jun. 2020	Aug. 2020	Sep. 2022	Jun. 2020	Sep. 2022	
Minnesota	Dec. 2021	Mar. 2022			Sep. 2022	Dec. 2020
Mississippi	Jun. 2020	Aug. 2020	Jun. 2020	Jun. 2020		
Missouri	Aug. 2020	Jul. 2021	Jun. 2021	Jun. 2020		
Montana	Jun. 2020	Jun. 2020	Jul. 2020	Jun. 2020		Dec. 2020
Nebraska	May 2020	May 2020				
Nevada	Jun. 2020	Jun. 2022	Jun. 2020	Jun. 2020		
New Hampshire	Jun. 2020				Sep. 2022	
New Jersey	Dec. 2021	Sep. 2022	Jun. 2020	Jun. 2020	Sep. 2022	
New Mexico	Jul. 2022	Dec. 2021	Jun. 2021	Jun. 2020	Nov. 2020	Sep. 2022
New York	Mar. 2022	Jun. 2022	Aug. 2020	Jun. 2021	Sep. 2022	
North Carolina	Sep. 2022	Sep. 2022	Jun. 2021	Jun. 2020	Sep. 2022	
North Dakota		Jun. 2020	Jun. 2020	Jun. 2020		
Ohio	Jun. 2022	Jun. 2022	Jun. 2022	Jun. 2020		Dec. 2020
Oklahoma	Oct. 2022	Nov. 2022.	Jun. 2020	Jun. 2020		

## USDA-Approved SNAP Operations Waivers, as of July 18, 2022

Listed by last month option or waiver is in effect

State	Extend certification periods and adjust periodic reports	Waive initial/ recertification interviews	Not offer face-to-face interviews	Waive expedited interviews	Adapt telephonic signature requirements	Use periodic report procedures to recertify households
Oregon	Jun. 2022	Jun. 2022	Jul. 2020	Aug. 2020	Jun. 2022	Jun. 2022
Pennsylvania	Mar. 2022	Jan. 2022	Jun. 2021	Jun. 2020		Dec. 2020
Rhode Island	Sep. 2022	Sep. 2022	Sep. 2022	Sep. 2022	Jun. 2020	Sep. 2022
South Carolina	May 2021	Sep. 2022	Jun. 2021	Jun. 2020		
South Dakota	Jun. 2020	Jun. 2020	Jun. 2020	Jun. 2020		
Tennessee		Aug. 2020	Jun. 2020	Jun. 2020		
Texas	Aug. 2022	Aug. 2022	Jul. 2020	Jun. 2020		
Utah						
Vermont	Nov. 2020	May 2020				
Virgin Islands	Dec. 2021	Jul. 2022	Jun. 2021	Jul. 2022		
Virginia	Jun. 2020	Sep. 2022	Jan. 2021	Jun. 2020	Jun. 2020	
Washington	Jun. 2022		Jun. 2022		Mar. 2022	
West Virginia	Sep. 2022	Sep. 2022	Dec. 2021	Sep. 2022		Dec. 2020
Wisconsin	Dec. 2021	Sep. 2021			Sep. 2022	
Wyoming						
Total	48	48	43	42	25	13

Notes: This table includes waivers under the Families First law, which require USDA approval, and were originally largely approved from March through August 2020, until USDA gave state agencies the option in May 2021 to request waivers through December 2021 or the end of their state (or the national) public health emergency. For more on states' use of waivers, see <a href="https://www.fns.usda.gov/programs/fns-disaster-assistance/fns-responds-covid-19/snap-covid-19-waivers">https://www.fns.usda.gov/programs/fns-disaster-assistance/fns-responds-covid-19/snap-covid-19-waivers</a>. For extensions approved under the May 2021 guidance, see <a href="https://www.fns.usda.gov/snap/extension-covid-19-administrative-flexibilities-may-2021-and-beyond">https://www.fns.usda.gov/snap/extension-covid-19-administrative-flexibilities-may-2021-and-beyond</a>. This table also includes options from the October 2020 government funding law that did not require USDA approval and that states implemented through June 2021 (or through December 2021 for the option to use periodic report procedures to recertify households). For more on states' use of these options, see <a href="https://www.fns.usda.gov/snap/cr-state-options">https://www.fns.usda.gov/snap/cr-state-options</a>. States can choose how to implement these waivers, and some states extend these flexibilities for just a portion of their caseload or in otherwise limited fashion; this table only shows states' usage of these waivers as reported by USDA. This table also shows the last month the state has opted to extend the flexibility; states may have had months without this flexibility. Please see the FNS website for a spreadsheet of Active COVID Waivers by State for any updates after the "as of" date listed: <a href="https://www.fns.usda.gov/snap/extension-covid-19-administrative-flexibilities-january-2022-and-beyond">https://www.fns.usda.gov/snap/extension-covid-19-administrative-flexibilities-january-2022-and-beyond</a>.

Sources: USDA Food and Nutrition Service (FNS) and state agencies

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<sup>6</sup> For a brief summary of many of these waivers, all of which can be found at the Food and Nutrition Service, see "SNAP: COVID-19 Waivers by State," <a href="https://www.fns.usda.gov/disaster/pandemic/covid-19/snap-waivers-flexibilities">https://www.fns.usda.gov/disaster/pandemic/covid-19/snap-waivers-flexibilities</a>. USDA has allowed state agencies to extend these through month after the month in which the federal public health emergency ends as well.

USDA originally <u>allowed</u> 25 state agencies to temporarily stop pursuing certain claims and not consider related payments delinquent. (When SNAP households receive more benefits than they are eligible for — for example, because the SNAP eligibility worker made a mistake, or the household misunderstood the rules or provided incorrect information by mistake or intentionally — SNAP state agencies must collect the amount overpaid, unless pursuing the claim is not cost effective.) All of these states had these waivers extended through June 2020, and some 13 states received July 2020 extensions, with smaller numbers approved for extensions past July 2020, including at least four states extending through December 2021. USDA also approved one state (California) for an extension on submitting data to USDA on claims collection. In November 2021, USDA provided options for states facing challenges in administering claims due to the pandemic; several states have been approved to adjust their overpayment policies.

At least 23 states were approved for waivers to extend the timeframe to complete fair hearings, which states are required to provide for SNAP participants to appeal a state decision that affects their participation, such as denying or terminating benefits; these hearings are an important tool for clients to exercise their rights. All of these states had these waivers extended through June 2020 and fewer states were extended through subsequent months, including at least eight states with extensions through December 2021. These waivers have now expired.

At least four states have received waivers to extend the timeline for administrative disqualification hearings, which states must provide to determine that an individual has committed an intentional violation of program rules (such as making a false statement). Fewer states were approved past June 2020.

USDA <u>approved</u> several state waivers to temporarily suspend use of the Income and Eligibility Verification System, a database in which states ordinarily must verify certain income and other information in spring 2020.

Three states received <u>approval</u> to extend the period of time granted to households that have attempted to but are unable to provide a Social Security number, and USDA approved some states to continue to extend these waivers through December 2021. As of August 2022, four states are still operating under this waiver.

At least two states <u>received approval</u> in spring 2020 to delay notices that states must issue to households with multiple EBT card replacement requests.

Three states <u>received</u> waivers to allow certain community partners that assist SNAP applicants with the application process to sign the application on the client's behalf after obtaining consent to serve as the client's authorized representative. USDA has continued to approve extensions of these waivers for some states.

At least four <u>states</u> were approved to suspend in-person collection of applications and verification documents. Some of those states had extensions up through December 2021.

At least two states were approved to streamline the process to determine whether individuals are unable to meet certain work requirements. (Though Families First suspended the time limit nationwide, states that receive funding to offer a slot in a work or training program to individuals subject to the time limit can still apply the time limit to those individuals unless they have "good cause" for not meeting the requirements. Similarly, states can determine whether an individual has good cause not to comply with more general SNAP work requirements for which they could otherwise be sanctioned. One of the waivers streamlines the process to determine whether individuals subject to the time limit who are offered slots in training programs have good cause. The other streamlines this good-cause determination for individuals subject to SNAP's general work requirements.)

<sup>&</sup>lt;sup>1</sup> In July, Department of Health and Human Services (HHS) Secretary Xavier Becerra renewed the federal public health emergency (PHE) through mid-October. Recognizing the significant changes that will need to happen at the end of the PHE and the need for adequate time to prepare. HHS has promised states that it will provide 60 days' notice before ending the PHE.

<sup>&</sup>lt;sup>2</sup> A state in which the governor or a state agency (such as the health department) has declared a public health emergency is eligible to issue emergency allotments. States may issue allotments for one additional month following the last month the emergency declaration is in effect. As of August 2022, 16 states (Arizona, Arkansas, Florida, Georgia, Idaho, Indiana, Iowa, Kentucky, Mississippi, Missouri, Montana, Nebraska, North Dakota, South Dakota, Tennessee, and Wyoming) had stopped issuing allotments. Other states may also cease issuing these allotments in coming months.

<sup>&</sup>lt;sup>3</sup> Puerto Rico, the Commonwealth of the Northern Mariana Islands, and American Samoa, which receive nutrition block grants instead of SNAP, were not originally included in P-EBT and could not issue those benefits for the 2019-2020 school year; the October 2020 government funding bill extended eligibility to them. Guam and United States Virgin Islands do participate in SNAP and have had the same eligibility as states.

<sup>&</sup>lt;sup>4</sup> P-EBT benefits can be issued to eligible school-aged children to cover a period "in any school year in which there is a public health emergency designation" or "in a covered summer period following a school session," which means that P-EBT benefits for school-aged children could extend for some period beyond the end of the public health emergency. However, P-EBT benefits for eligible children under age 6 can only be issued for periods "during a public health emergency." See Section 1101(a) and (h) of the Families First Coronavirus Response Act (7 U.S.C. 2011 note; Public Law 116-127).

<sup>&</sup>lt;sup>5</sup> All states except North Dakota have been approved to provide summer 2021 P-EBT benefits, but Mississippi and Idaho were only approved to provide those benefits to school-aged children.

<sup>&</sup>lt;sup>7</sup> Beginning in August 2020, USDA limited approvals of many waivers that modified SNAP procedures and began approving states for narrow versions of these waivers, though these waivers were replaced by the more flexible options included in the October 2020 government funding law. USDA approved waivers for states, called either "core verification and interview adjustment" or "periodic report flexibility for non-extended recertification cases" waivers, that give states more flexibility to streamline the renewal process for households that are due to renew in coming months, such as limiting the number of households required to complete an interview at recertification. These waivers are not shown in the tables.

<sup>&</sup>lt;sup>8</sup> The October 2020 government funding law suspended these reviews from June 2020 through September 30, 2021; the December 2020 COVID-19 relief package moved up the end of this flexibility to June 30, 2021.