

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2170017
2. **Type of request:** Extension
3. **Regulatory citation:** 7 CFR 273.2(i)(3)(iii) and 273.2(i)(4)(iii)(A) and (B)
4. **State:** Rhode Island
5. **Region:** Northeast
6. **Regulatory requirements:** Federal regulations at 7 CFR 273.2(i)(3)(iii) state:

Out-of-office interviews. If a household is entitled to expedited service and is also entitled to a waiver of the office interview, the State agency shall conduct the interview (unless the household cannot be reached) and complete the application process within the expedited service standards. The first day of this count is the calendar day following application filing. If the State agency conducts a telephone interview and must mail the application to the household for signature, the mailing time involved will not be calculated in the expedited service standards. Mailing time shall only include the days the application is in the mail to and from the household and the days the application is in the household's possession pending signature and mailing.

Federal regulations at 7 CFR 273.2(i)(4)(iii)(A) and (B) state:

(A) For households applying on or before the 15th of the month, the State agency may assign a one-month certification period or assign a normal certification period. Satisfaction of the verification requirements may be postponed until the second month of participation. If a one-month certification period is assigned, the notice of eligibility may be combined with the notice of expiration or a separate notice may be sent. The notice of eligibility must explain that the household has to satisfy all verification requirements that were postponed. For subsequent months, the household must reapply and satisfy all verification requirements which were postponed or be certified under normal processing standards. If the household does not satisfy the postponed verification requirements and does not appear for the interview, the State agency does not need to contact the household again.

(B) For households applying after the 15th of the month, the State agency may assign a 2-month certification period or a normal certification period of no more than 12 months. Verification may be postponed until the third month of participation, if necessary, to meet the expedited timeframe. If a two-month certification period is assigned, the notice of eligibility may be combined with the notice of expiration or a separate notice may be sent. The notice of eligibility must

explain that the household is obligated to satisfy the verification requirements that were postponed. For subsequent months, the household must reapply and satisfy the verification requirements which were postponed or be certified under normal processing standards. If the household does not satisfy the postponed verification requirements and does not attend the interview, the State agency does not need to contact the household again. When a certification period of longer than 2 months is assigned and verification is postponed, households must be sent a notice of eligibility advising that no benefits for the third month will be issued until the postponed verification requirements are satisfied. The notice must also advise the household that if the verification process results in changes in the household's eligibility or level of benefits, the State agency will act on those changes without advance notice of adverse action.

7. Proposed alternative procedures:

Rhode Island will continue to postpone the interview for certain expedited service households provided the identity can be verified and the State agency has attempted to contact the household for an interview. This would allow the State agency to provide benefits within 7 days for certain expedited service eligible households. In these cases, the interview would be treated similar to other verification and could be postponed during the initial 1 or 2 month period. Therefore, households that apply on or before the 15th of the month would complete the interview, provide necessary verification, and have their applications processed by the end of the month of application in order to continue receiving ongoing benefits. Households that apply after the 15th of the month would complete the interview, provide necessary verification, and have their applications processed prior to the end of the month following application in order to continue receiving ongoing benefits.

If screened as eligible for expedited SNAP, Rhode Island DHS staff will attempt to contact the household for an interview the day the application is received.

If the applicant is applying in person at a DHS field office, staff will conduct the interview while the applicant is in the office and process the application and determine eligibility using existing policy and procedures.

If the household is applying through mail, fax, drop-off or online, DHS staff will attempt to contact the household to conduct the interview through telephone. If staff is successful at reaching the applicant and conducts the interview through the telephone, the application and eligibility will be processed using existing policy and procedures.

If the household is applying through mail, fax, drop-off, or online, and DHS is not successful at reaching the applicant to conduct an interview through the phone, the following process will take place:

- Staff will confirm the proof of identity for the head of household through documentation submitted with the application as well as through use of data exchange sources such as social security records. Staff will subsequently

confirm the information gathered during the interview. If identity for head of household cannot be confirmed, eligibility will not be processed and a request for verification will be mailed along with a scheduled interview time.

- If identity is confirmed, staff will process the application applying the regular eligibility processing policy and procedures. If the application is deemed eligible for SNAP, applicant will be sent a benefit decision notice indicating the benefit amount and that the benefit period will end after either the second or third month, depending on date they submitted their original application.
- The household will be sent an appointment letter with a scheduled telephone interview.
- If the applicant participates in the interview and provides the necessary verifications to retain eligibility, staff will update the system enabling the 12 month or 24 month certification period to continue.
- If the applicant does not participate in the interview or does not provide the necessary verification, the case will close at the end of second or third month, depending on date when initial application was filed.

- 8. Justification for request:** This waiver has allowed RI to process expedited SNAP applications more efficiently, allowing the most vulnerable households access to food assistance in a timely manner. It has also helped RI to catch up with the backlog of expedited SNAP cases created as a result of the new eligibility system implementation and its resulting system issues. The waiver allows for better caseload growth management and improves customer service for households applying for expedited service SNAP.
- 9. Caseload information, including percent of caseload and description of population expected to be affected by this waiver:** In November 2017, Rhode Island DHS received a total of 4,487 SNAP applications. Out of those, 2,459 were expedited SNAP applications. At this time, SNAP expedited applications represent approximately 55% of the SNAP monthly caseload.
- 10. Anticipated impact on households and State agency operations:** This waiver helps RI DHS manage SNAP application caseloads more efficiently by improving program administration. The waiver does not have any negative impact on the households or State agency operations. Furthermore, it does not result in any additional costs or expenses.
- 11. Anticipated implementation date and time period for which waiver is needed (please indicate if the waiver approval is needed to make system adjustments):** The current waiver expires on December 31, 2017. RI would like to continue with the waiver as of January 1, 2018 and continue to use it for an additional 12 month period, ending on December 31, 2018.
- 12. Proposed quality control review procedures:** No special Quality Control (QC) procedures are required for cases subject to the provisions of this waiver. Cases to

which this waiver will be applied will be subject to the same standard QC procedures as all other SNAP cases pursuant to the FNS Handbook 310.

13. Name, title, and email of requesting official:

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14. Date of request: December 28, 2017

15. State agency staff contact:

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16. Regional Office contact person (*to be completed by FNS regional office*):