

Important Things to Note in HR6201

Our state partners are working tirelessly to ensure regulations are relaxed as much as possible so that county agencies can focus on mission critical work – keeping kids and vulnerable adults safe, ensuring families have the monetary assistance they need and are entitled to, and helping those employers who are hiring find workers.

With the passage of HR6201, there were several SNAP changes and States were given the ability to request waivers on a number of SNAP requirements. JFS has already made a few requests to FNS that will be extremely helpful to us as we move towards streamlining our operations even more in these uncertain days.

Changes:

1. JFS is proceeding with a statewide waiver of the ABAWD time limit beginning April 1, 2020. They believe they will be able to use the discretionary exemptions to cover the ABAWD population for March 2020.
2. Additional mass supplemental SNAP dollars have been approved but at this time there is little guidance on how FNS will interpret the language in the bill. JFS will be speaking to FNS today for more information.

Waiver requests (not allowable right now):

1. Allow expedited processing of SNAP to be used throughout the state of emergency. This means if someone is issued SNAP under expedited rules, the certification would last longer than the normal 1 – 2 month timeframe.
2. Extend all current SNAP certification periods for one year for everyone so no one loses SNAP eligibility during the emergency.
3. Waive the requirement that SNAP applications be accepted in person since phone, online, and mail is available now.
4. Waive stringent verification requirements to allow for more client attestation without having to do as much collateral contact and electronic sources.
5. Suspend reporting requirement including interim reporting. Only changes that would increase benefits would be acted on.

Reminders:

- **Employment and Training:**
 - o Whenever possible, grant a good cause exemption for circumstances outside of the clients' control (in example, this pandemic). ODJFS has shared with advocate groups that they have encouraged counties to do this.
 - o Yesterday, the state sent out guidance on CCMEP which is helpful to understand the direction the state is taking in regarding to employment and training: *With recent travel restrictions and guidance on social distancing, lead agencies and youth service providers are encouraged to consider virtual options for services and activities. CCMEP participant OWF work eligibles negatively impacted by COVID-19 restrictions may qualify for good cause which should always be communicated to the cash assistance case managers on a timely basis to ensure these participants are not sanctioned inappropriately.* To date, states are not exempt from federally mandated work participation requirements.

- We remind you and your staff to continue to use your best judgement in providing services to clients.
 - Documentation continues to be extremely important.
- Prevention, Retention and Contingency Programs/COVID-19 Response
 - As you work to develop your PRC plan changes to offer COVID-19 Response funds, we share this language from FAL 183-A that was highlighted by a county peer: *County agencies could provide a COVID-19 payment to eligible families to help them prepare for self-quarantine and social distancing.* For those counties who are looking to do a PRC cash payment, this language may be helpful to include in your PRC plans.