

Food Assistance Updates and Options in Response to COVID-19

Current SNAP Flexibilities provided by FNS

Requirement	Summary	CDHS status
Application Filing 7 CFR §273.2(c)(1)	<ul style="list-style-type: none"> • Allow clients to file applications by mail, telephone, or online • Develop a mobile application or mobile-enabled website for households to apply, submit verification, and report changes 	In place (eg. PEAK and Mobile App)
Interviews 7 CFR §273.2(e)(2)	<ul style="list-style-type: none"> • Utilize telephone interviews instead of face-to-face interviews 	In place New - for clients who applied without a phone number, schedule an interview for the client to call in, instead of calling out to the client
Certification Periods 7 CFR §273.10(f)	Extend maximum allowable certification periods: <ul style="list-style-type: none"> • 24 months for households in which all adult members are elderly or disabled • 12 months for all other households 	In place - Elderly/disabled are already at 24 months New - Working on a modification to extend 6 month certification periods for March, April and May recertification HHs.
Verification 7 CFR §273.2(f)	<ul style="list-style-type: none"> • Maximize the use of verification through online databases to reduce paperwork • Consider document imaging technology or electronic submission of verification documents 	In place (eg. Work Number) New -Encourage counties to accept client declaration only when verification is not easily obtained and to only verify what is necessary.
Issuance and Redemption	<ul style="list-style-type: none"> • Replace any aspects of EBT card issuance that are currently only available by an over-the-counter method with card issuance by mail 	In place
Work Requirements and Employment & Training	<ul style="list-style-type: none"> • Consider if circumstances beyond the individual's control justify the application of good cause for the individual to not meet the work requirements 	New - Working on CBMS fix to not count any countable months for ABAWDs for the months of March and April. Lifting disqualification for those who received three countable months

	<ul style="list-style-type: none"> • Applying good cause allows households that do not meet the ABAWD work requirements or mandatory E&T requirements to continue receiving SNAP 	and were set to close for April.
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Additional steps already taken by CDHS:

- Implementing an auto-processing of PRFs (12-month report for our 24-month certification HHs) for the months of March, April and May.
- Extending 6-month certification periods to the full 12-months, for recertifications due in March, April and May.
 - At this time, only RRRs for households with certification periods ending at 24 months will need to be worked.

Options included in pending Families First Coronavirus Act (H.R. 6201)

For the items listed below, we have no information on our ability to do this outside of this specific pending bill. H.R. 6201 passed the House. The Senate expects to take it up tomorrow or Thursday.

- The bill includes a provision to allow for temporary SNAP benefits in areas where there is a public health emergency and schools are closed for at least 5 consecutive days.
 - States can issue temporary benefits through EBT cards for households with children eligible for free or reduced-price school meals.
 - States must submit plans to USDA for approval prior to issuing the benefits.
- Effective April 1 and until the end of a month where the public health emergency declaration is ended, SNAP eligibility will not be contingent on the ABAWD work requirement, which requires that able-bodied adults (18 – 49), though states may continue to require participation in programs offered by State agencies.
 - The bill language also excludes impacted months from being counted towards the "3 in 36-month" work requirement provision for ABAWDs.
 - For Colorado, we have broadly used the 'good cause' provision to do something similar.
- The bill also authorizes USDA to consider state requests for emergency allotments of SNAP benefits to households to address temporary food needs and adjust issuance methods if needed based on practical conditions in affected areas.

EBT Guidance

- Communication -
 - Make sure all staff members are aware of operations and expectations of administering the programs.
 - Make sure clear, consistent messaging is in place on how clients can access their benefits.

- EBT cards should be discussed in **all** interviews. Ask if they already have an EBT card, if so, they do not need to get another one.
 - Encourage mail card issuance
- Initial, first EBT card - has to be generated at the county office
 - Clients **cannot** contact the EBT customer service to get their first EBT card
 - Counties should use the ebtEDGE Auto-Issue function. When adding the client demographics the full mailing address **must be included**
 - Issue the card using county inventory and mail from the county office. For EXP FA, overnight mailing should be done if possible.
- Replacement EBT cards -
 - Clients can request through the EBT customer service (1-888-328-2656) if the address in ebtEDGE is correct
 - If address is not correct, the county can email: cdhs_ebt_policy@state.co.us to update addresses in order to use the auto-issue function or
 - Issue the card using county inventory and mail from the county office
- Mail Card Reminders
 - If the cardholder is receiving mail at someone's address, they should report it to the USPS to prevent the card from being returned.
 - Cards will not be forwarded - they will be returned to the sender.
 - General Delivery can be used for individuals that do not have a mailing address
 - Review the EBT Mail Card Issuance Memo, released 9/9/2019 and your County Mail Card Issuance Policy/Procedure

CSFP & TEFAP

- If you receive direct or multiship deliveries from USDA, please notify us immediately if you will have any closures. FDP needs to notify USDA and coordinate shipping.
- CSFP
 - What we can't control
 - Federal Regulation outlines an application signature and requirements. An agency may sign on behalf of the client to limit client contact, but the client signature must be obtained within 90 days. The signature may be obtained by mail, by a caretaker, or through a 1.1 meeting to avoid a large congregation of people. Requires approval from FNS
 - What we can control
 - No signatures required to distribute food
 - No signatures required for recertification
 - What are distribution sites doing
 - Pueblo County conducted a drive through distribution this weekend.
- TEFAP
 - What we can't control
 - Federal Regulation outlines record keeping requirements. Distribution must collect the name of the person picking up food, the household address, the number of people in the household, and how the household is eligible to receive benefits.
 - Federal Regulation and the CDHS TEFAP State Plan outlines eligibility. A household is eligible if they participate in one of 9 public assistance programs or if the household income is 200% of poverty or less.
 - What we can control
 - TEFAP client signatures are waived.
 - Distribution rates are determined by the RA.

- USDA Foods may be distributed more than once per month.
- CDHS may adjust eligibility guidelines. Requires approval from FNS.
- CDHS may implement a certification period. Requires approval from FNS.

Myth Busting

Food Assistance

- We are not approved for D-SNAP (Disaster SNAP); if these actions become necessary, we will keep you informed
- Face to face interviews are not required- phone interviews should be the primary method
 - If a client requests a face to face interview, assure them a telephone interview will meet their needs.
 - Please explain that a face to face will not provide them access to benefits quicker as telephone interviews have the same timeliness expectations.
 - If the client does not have a phone number, counties should provide the client with a phone number they can call into at the time of their scheduled interview.
- All verifications can be turned in through PEAK, the Mobile App, or other electronic means
 - Counties need to ensure that all technicians are checking EDMS in CBMS for digitally submitted verifications through PEAK and the Mobile App
 - Only verify what is absolutely necessary to determine eligibility.
 - If verification can not be obtained, use client declaration and document clearly what the client declared. Ask the client up front if they can obtain the verification, if they can not, attempt a collateral contact, if unsuccessful, use client declaration.
 - Actual hard copies of documents are never required.
- Outreach partners can assist with telephonic applications for individuals who are unable to use PEAK or paper applications
- Good cause can be given for all Food Assistance work requirements (voluntary quit, ABAWD requirements)

The Emergency Food Assistance Program

- Colorado is temporarily waiving client signatures on the TEFAP application. The name of the person picking up the food, the household size and address, and how the household is eligible must still be collected and recorded.

Commodity Supplemental Food Program

- Client signatures are NOT required for certified clients to pick up their food box.
- Client signatures are no longer required to recertify CSFP clients. Recertification is conducted annually and client information is collected verbally. Only the certifier's signature is required.

NSLP and CACFP USDA Foods Program

- NSLP and CACFP USDA Foods can be used for programs including Summer Food Service Program (SFSP), School Breakfast Program (SBP), National School Lunch Program (NSLP), and After school snacks program.
- To find a list of school feeding sites go to this site
<https://www.cde.state.co.us/nutrition/nutriemergencyfeeding#COVID-19>
- NSLP and CACFP USDA Foods can be used for congregate meals at a school site if there is a presidential declared disaster or situations of distress. All situations need approval from the State Distributing Agency (CDHS, FDP) and some situations need approval from FNS (MPRO). FNS 292A form is used once the disaster is over for requests of reimbursement of USDA Foods only.
- School Food Authorities should never give the Red Cross or other disaster organizations authority to take USDA Foods out of the schools on their own. ONLY the SFA has authority to distribute and/or use USDA Foods from their inventory. Additionally, please take care to request IDs or other documentation to ensure individuals requesting USDA Foods are legitimate Emergency Feeding Organization workers.
<https://www.colorado.gov/pacific/cdhs/disaster-feeding-and-commodity-alerts>

Colorado Works and Adult Financial Eligibility

- Face to face interviews are not required
- Benefits can be issued by key bank card or direct deposit
- All verifications can be turned in through PEAK, the Mobile App, or other electronic means
- Use collateral contacts and interfaces as much as possible

TANF Workforce

- All plan development can be done with electronic and verbal signatures with a documented case note.
- Orientation is not a program requirement.
- Client statement is an allowable verification for work participation hours
- Face to face interactions are not required
- All verifications can be turned in through electronic means

Employment First

- All plan development can be done with electronic and verbal signatures with a documented case note.
- Orientation is not a program requirement
- Client statement is an allowable verification for work participation hours
- Face to face interactions are not required
- All verifications can be turned in through electronic means
- Good cause can be given for all Food Assistance work requirements (voluntary quit, ABAWD requirements)