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 have made it even more difficult for many low-income households to afford food and other needs. Data 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 have been 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 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 Biden Administration has announced that the federal public health emergency will likely remain in place for the rest of 2021. Some states have taken steps toward ending or have ended their state COVID-19-related emergency declarations, and a small number of states have ceased issuing allotments. Households experience a significant benefit cut when these allotments end. Figure 1 below shows the months for which these allotments have been approved to date.

In addition to these allotments, the COVID-19 relief package 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, in August 2021 USDA announced it had completed the congressionally mandated revision of the Thrifty Food Plan (TFP), the basis for SNAP benefits, which will raise benefits for SNAP households beginning 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 are receiving a modest increase in their SNAP benefits. For example, a household of three receiving the maximum benefit (all households in most states that are continuing to distribute emergency allotments) is seeing a $42 increase in October compared to September, 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.

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.

The government funding law enacted in October 2020 extended P-EBT through September 2021 and included some expansions, including extending the program to pre-school-aged children and to some territories originally left out of P-EBT. The December 2020 COVID-19 relief package included additional simplifications. The American Rescue Plan allowed states to continue their P-EBT program during the summer 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. 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 also received approval and has issued or is issuing 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. Over 45 states, Washington, D.C., and Puerto Rico have also been approved to provide benefits for summer 2021 to both school-aged children receiving free- and reduced-price school meals and children under age 6. The Biden Administration has also provided guidance for states to provide benefits for students in the 2021-2022 school year for students learning virtually due to COVID-19.

Table 1 shows the states with current or past P-EBT adoptions. P-EBT benefits may be issued retroactively once states are approved. We will continue to update Table 1 as more states are approved for the 2020-2021 school year (to provide benefits to pre-school-aged children) and summer 2021 (for both pre-school-aged and school-aged children). We will also update once states have been approved for P-EBT for the 2021-2022 school year. 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-19 pandemic be in effect during the school year.

For more detail on states’ implementation of P-EBT for spring 2020 benefits, see “CBPP/FRAC P-EBT Documentation Project Shows How States Implemented a New Program to Provide Food Benefits to Up to 30 Million Low-Income School Children;” and for the 2020-2021 school year, see the Urban Institute’s “State-by-State Guide to the 2020–21 Pandemic EBT Program.”

While not through the Families First Act, beginning in spring 2020 and during subsequent months, USDA also expanded access to a key flexibility:

- **Pilot an online purchasing program.** The 2014 farm bill created a pilot program 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). Since the pandemic hit, more states have been approved for expedited online purchasing pilots, and now most states have such a program, shown in Table 1. Online purchasing is limited to state-approved retailers, which include Walmart and/or Amazon in all states and ALDI in 38 states. Other approved retailers include Food Lion, BJ’s Wholesale Club, ShopRite, Publix, Price Chopper...
Supermarkets, Hannaford, and Stop & Shop — all in at least five states — and other regional and local retailers, such as H-E-B in Texas and Giant in several mid-Atlantic states. The map below shows which retailers are operating online purchasing pilot programs by state. This waiver allows individuals receiving SNAP benefits to get the food they need while adhering to social distancing rules. Because these programs are independent of the Families First Act, they are not subject to the same emergency declaration requirements.

**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 rose from about 37 million in February 2020 to about 43 million in May; this number stayed steady through September, before dropping slightly to about 42 million in December 2020 and remaining at roughly that level through June 2021. State SNAP agencies have had to manage this greater volume at a time of office closures, staffing shortages, and potential difficulties with a remote work environment throughout 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 recent survey.

Some states began transitioning off these flexibilities in the second half of 2020, as USDA began approving fewer extensions, but the October 2020 government funding law restored many of these options. USDA announced that beginning in May 2021, states can extend these flexibilities through December 31, 2021 (or the month following the end of the national public health emergency, whichever is sooner), 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 a 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.” Every month a portion of SNAP participants ordinarily 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.

States were originally approved for waivers to extend certification periods for SNAP households through May 2020; most states requested and received extensions of this waiver through June 2020. USDA then approved waivers (after originally denying most requests) through August and September 2020 for a limited number of states and approved limited modifications to reporting requirements for households that are renewing benefits. The October 2020 government funding law allowed states to return to the more extensive options originally offered without requesting USDA approval, and some states began using this option again to use this flexibility through June 2021. Under May 2021 guidance, states may request to extend the more extensive waivers available through December 2021. 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 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 recent survey 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 nationwide waiver of the required interview at the application or recertification stage to ensure that newly eligible households can access food assistance through SNAP and others can stay on. As with the waivers to extend certification periods, USDA originally allowed extensions through June 2020, and through July and August for some states meeting certain requirements and limited versions for others. After USDA indicated it would largely approve only very limited versions of these waivers beginning in September 2020, many states began transitioning off the waivers. However, the October 2020 government funding law allowed states to implement the original versions of the waiver through June 2021 without requesting USDA approval, and many states began using this flexibility again. Under the May 2021 guidance, states may now continue this flexibility through December 2021. 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, and states may extend through December 2021.

- **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 December 31, 2021.

### Other Administrative Options and Waivers

In addition to extending approvals for states to use flexibility under existing SNAP regulations, USDA has approved and extended many other waivers under the Families First Act that temporarily suspended administrative requirements for states, not shown in the tables below. USDA continued to approve some of these waivers on a monthly basis and, beginning in May 2021, let states request these options through December 2021. 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.

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. 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 announced in April 2021 that states may 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.
# State Emergency Allotments and Extensions by Month

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# State Emergency Allotments and Extensions by Month

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Note: States must have both a state and national public health emergency declaration to issue benefits. As of publication date, at least nine states have ended issuing emergency allotments or September is their last month. 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.)
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<th>Provide P-EBT to children under age 6, 2020-2021 school year2</th>
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TABLE 1
Pandemic EBT and Online Purchasing Pilots, as of October 1, 2021

<table>
<thead>
<tr>
<th>State</th>
<th>Provide benefits for households with children missing school meals in 2019-2020 school year (P-EBT)</th>
<th>Provide P-EBT, August-September 2020</th>
<th>Provide P-EBT to school-aged children, 2020-2021 school year</th>
<th>Provide P-EBT to children under age 6, 2020-2021 school year</th>
<th>Provide P-EBT, summer 2021</th>
<th>Pilot an online purchasing program</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oklahoma</td>
<td>X</td>
<td>X</td>
<td>Available</td>
<td>Available</td>
<td>Available</td>
<td>Available</td>
</tr>
<tr>
<td>Oregon</td>
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<tr>
<td>Puerto Rico</td>
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<td>X</td>
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<tr>
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<td>X</td>
<td>X</td>
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<td>South Dakota</td>
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<tr>
<td>Virgin Islands</td>
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<tr>
<td>Wyoming</td>
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<td>X</td>
<td>X</td>
<td>X</td>
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<tr>
<td><strong>Total</strong></td>
<td><strong>52</strong></td>
<td><strong>20</strong></td>
<td><strong>55</strong></td>
<td><strong>49</strong></td>
<td><strong>46</strong></td>
<td><strong>48</strong></td>
</tr>
</tbody>
</table>

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. USDA recently announced guidance that would allow states to issue benefits in the 2021-2022 school year, though as of the publication date no states have been approved.

2States 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.

3With the exception of Mississippi, all states to date that have been approved for summer P-EBT have been approved to provide benefits both to children in school and to certain children under age 6 receiving SNAP benefits.

4Puerto 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 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.
### USDA-Approved SNAP Operations Waivers, as of October 1, 2021

Listed by last month option or waiver is in effect

<table>
<thead>
<tr>
<th>State</th>
<th>Extend certification periods and adjust periodic reports</th>
<th>Waive initial/recertification interviews</th>
<th>Not offer face-to-face interviews</th>
<th>Postpone expedited interviews</th>
<th>Adapt telephonic signature requirements</th>
<th>Use periodic report procedures to recertify households</th>
</tr>
</thead>
<tbody>
<tr>
<td>Idaho</td>
<td>May 2020</td>
<td></td>
<td></td>
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<tr>
<td>Nebraska</td>
<td>May 2020</td>
<td>May 2020</td>
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<td></td>
<td></td>
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</tr>
<tr>
<td>State</td>
<td>Extend certification periods and adjust periodic reports</td>
<td>Waive initial/recertification interviews</td>
<td>Not offer face-to-face interviews</td>
<td>Postpone expedited interviews</td>
<td>Adapt telephonic signature requirements</td>
<td>Use periodic report procedures to recertify households</td>
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<tr>
<td>---------------</td>
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<td>Utah</td>
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<td>Nov. 2020</td>
<td>May 2020</td>
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<tr>
<td>Wisconsin</td>
<td>Dec. 2021</td>
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<tr>
<td>Wyoming</td>
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<tr>
<td>Total</td>
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<td>48</td>
<td>43</td>
<td>42</td>
<td>24</td>
<td>13</td>
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</table>

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 [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). For extensions approved under the May 2021 guidance, see [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). 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 [https://www.fns.usda.gov/snap/cr-state-options](https://www.fns.usda.gov/snap/cr-state-options). 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.

Sources: USDA Food and Nutrition Service (FNS) and state agencies.
1 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 October 1, 2021, eight states (Arkansas, Florida, Idaho, Montana, Missouri, Nebraska, and North Dakota) had stopped issuing allotments and at least one other state (Maryland) had indicated that September 2021 would likely be their last month of emergency allotments. Other states may also cease issuing these allotments in coming months.

2 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.

3 All states that have been approved to provide summer P-EBT benefits but Mississippi have been approved to provide those benefits to both school-aged children and those under age 6 in SNAP households.

4 The original interview waivers included three major adjustments of normal SNAP requirements for state agencies. The waivers allowed states to: approve new households without conducting the normally required interview, not offer a face-to-face interview or grant one upon request, and approve households with very low income eligible for “expedited benefits” without an interview. USDA limited some extensions beginning in July 2020 to just some of those options, but the October 2020 government funding law restored options for states to use all three of these flexibilities through June 2021, and recent USDA guidance allows states to extend all of these flexibilities through December 2021.

5 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,” https://www.fns.usda.gov/disaster/pandemic/covid-19/snap-waivers-flexibilities. USDA has allowed state agencies to extend these through December 2021 as well.

USDA originally allowed 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.

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.

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 approved 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 approval to extend the period of time granted to households that have attempted to but are unable to provide a Social Security number, and USDA has approved some states to continue to extend these waivers through December 2021.

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

Three states received 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 states were approved to suspend in-person collection of applications and verification documents. Some of those states have requested and been approved for extensions up through December 2021.

At least two states have been 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.)

6 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-expanded 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 household required to complete an interview at recertification. These waivers are not shown in the tables.

7 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.