

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



Since March, 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 rising and ongoing administrative demands, and ensure that participants maintain much-needed benefits.

The administrative flexibility has also facilitated unprecedented [growth](#) in SNAP participation to meet increased need and ensure that families experiencing hardship can quickly get benefits to buy food. But the Agriculture Department (USDA) has [limited or ceased approvals](#) of some of these key flexibilities in recent months. Given that states will face increased need and administrative challenges for months to come, extending flexibility as needed would help states continue to provide SNAP in a timely manner and help families struggling with increased hardship. The legislation that authorizes Pandemic EBT (P-EBT), which provides benefits to replace school meals when schools are closed or operating virtually, expires at the end of September. Policymakers must take action to extend P-EBT and make technical adjustments to accommodate the range of approaches to in-person and virtual instruction schools will be taking this year.

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 [data](#) have shown a sharp increase in the number of families reporting difficulty affording adequate food and other basic needs. SNAP is essential to helping these families put food on the table.

As we've [explained](#), the Families First Coronavirus Response Act provided USDA with authority to let states temporarily modify procedures to make it easier for families to continue participating in or apply for SNAP. And it 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 has [encouraged](#) states to use existing program flexibility.

All states have boosted emergency supplementary benefits for at least three months and many for up to seven months; the vast majority have taken steps to ease SNAP administration and maintain participation; and all states (except for the territory of Guam) were approved for school meal replacement benefits for the 2019-2020 school year, the below tables show. These flexibilities are largely temporary and, except in the case of P-EBT and online purchasing pilots, are contingent on both a federal public health emergency and a state issuance of an emergency or disaster declaration.

Some of the options states have adopted include:

- **Increase benefits to meet immediate rising need.** Families First provided two ways for states to raise benefits for many SNAP participants and other households experiencing falling income and rising food needs.
 - Emergency allotment: States can provide many SNAP households with emergency supplementary benefits up to the maximum benefit a household can receive; all states have used this option. SNAP benefits are [determined](#) based on a formula that estimates how much income families have available to buy food; SNAP benefits make up the difference between this amount and the maximum benefit, which is based on a USDA estimate of the cost of a nutritionally adequate diet at minimal cost. For example, in 2019, a family of three could receive a maximum benefit of \$505 if the state determined they had no income available to purchase food, but the average benefit for a household of three was an estimated \$365. About 60 percent of SNAP households ordinarily receive less than the maximum benefit because they have some income available to buy food under benefit calculation rules. In jurisdictions with the emergency allotment in effect, such

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.

- [Find the phone number for your state's office](#)
- [Find your state's SNAP website](#)

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

SNAP has [special rules](#) following natural disasters.

households get the maximum benefit. (Unfortunately, USDA's interpretation excluded the lowest-income 40 percent of SNAP households, who already receive the maximum benefit.)

Every state was originally approved to provide these benefits for two months, either March and April or April and May. 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. USDA's Food and Nutrition Service (FNS) has [clarified](#) that states can request additional months of emergency allotments as long as those conditions are met, with states providing up to seven months of these allotments to date (March through September). (States may actually issue these allotments in the next month, as many states began issuing March allotments in April. Many states are approved later in the month for these allotments.) Table 1 below shows the months for which these allotments have been approved to date.

- **P-EBT:** The Act allows states to submit requests to provide meal replacement benefits through SNAP, known as P-EBT, for households with children who attend a school that is closed for at least five days and who otherwise would have received free or reduced-price meals. Though many states needed time to overcome implementation challenges, all states (except for Guam) have now selected the option, with most having issued these benefits by mid-summer. (Table 2 shows these states that have adopted it.) These programs so far have replaced meals lost during the 2019-2020 school year and benefits have been issued retroactively for periods when schools were closed during that time. Families First allows states to provide these benefits through fiscal year 2020 (which ends September 30, 2020). FNS has recently clarified that states can submit a plan to provide these benefits for children who attend schools that are operating virtual programs in August and September, and has started approving states to provide benefits in those months. Legislation is needed, however, to extend the program past September and to address the range of hybrid approaches to virtual and in-person learning that many school districts are using for the current school year. P-EBT doesn't require a state public health or emergency declaration, but it does require a national public health emergency declaration.

For more detail on states' implementation of P-EBT, 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](#)".

- **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 early March 2020 (Alabama, Iowa, and Oregon). Since the crisis has hit, more states have been approved for expedited online purchasing pilots, and now most states have such a program, shown in Table 2. Online purchasing is limited to state-approved retailers, which in all states include Walmart and/or Amazon, as well as others such as Wright's Markets, Inc. in Alabama; ShopRite in Delaware, Maryland, New Jersey, New York, and Pennsylvania; and the FreshGrocer in New Jersey and Pennsylvania. This waiver allows individuals receiving SNAP benefits to get the food they require 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.

USDA has also approved several waivers that Families First allows for states to temporarily adjust their operations to help manage their workloads and help participants gain and continue access to the program:

- **Extend certification periods and adjust reporting requirements.** Every month a portion of SNAP participants ordinarily must submit paperwork and complete an interview to continue receiving benefits, called the recertification process. As Table 3 shows, the vast majority of states waived these requirements or extended deadlines for several months, to preserve participants' benefits and to streamline administrative work and help deal with rising applications at a time of reduced capacity. States were originally approved for these waivers through May, and most states requested and received extensions of this waiver through June. After originally denying most requests, USDA has allowed waivers through August and September for a limited number of states. USDA has also indicated it will approve limited modifications to reporting requirements for households that are renewing benefits, indicated below and in Table 2.

- **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 current environment where offices are closed and not all clients can access online applications. USDA has also allowed states to extend this waiver through December, as shown in Table 3.
- **Waive other requirements, such as the application interview, to better manage new applications.** In addition to taking steps to ensure participants can continue getting benefits, states have requested waivers to accommodate what in many states has been a dramatic rise in new applications. Given the large increase in unemployment and hardship in recent months that will likely continue, states [have seen](#) and will likely continue to see large SNAP application increases. State SNAP agencies have had to manage this rising volume at a time of office closures, staffing shortages, and potential difficulties with a remote work environment. And, given the expiration of additional federal unemployment insurance benefits at the end of July, states may be seeing new surges in applications from those individuals.

Over 40 states took up USDA's temporary [nationwide waiver](#) of the interview at the application or recertification stage in order to ensure that newly eligible households can access food assistance through SNAP and others can stay on, shown in Table 3. 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 in the current environment it can be a labor-intensive task that can delay approval. USDA allowed states to dispense with the interview temporarily for many households, originally at both initial application and at recertification. As with the waivers to extend certification periods, USDA allowed extensions up through June, and for July and August for some states meeting certain requirements and limited versions for others.¹ USDA has indicated it will largely approve very limited versions of these waivers in September and moving forward, including some adjustments to recertification interviews identified below and in Table 4.

- **Modify procedures to transition back to pre-pandemic operations.** USDA is approving narrower waivers related to renewal procedures for states beginning in September 2020 through December. USDA has 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 shown in Table 4.

In addition, USDA has approved some other waivers at least for September not shown in the tables below, including a limited version of the interview waiver that allows states to not offer a face-to-face interview or grant one on request), and has approved waivers to allow states to suspend in-person submission of application and verification documents, along with September extensions of waivers of some other administrative requirements.

USDA has also approved and extended many other waivers that temporarily suspended administrative requirements for states, not shown in the tables below.²

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 the Act's flexibility to conduct quality control interviews by phone instead of in person. USDA approved state extensions of this waiver through June for 49 states, and recently notified states that they may extend this waiver through December 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, or January or February 2020, and recently [announced](#) an extension for households selected in June 2020. It also allowed all states and territories participating in SNAP to cancel reviews for the months of March, April, and May.

USDA has also denied state waiver requests, some of which USDA has detailed in a [letter](#). For example, over half of states had requested waivers to temporarily suspend the student eligibility rules, which limit SNAP eligibility to college students enrolled at least half time in institutions of higher learning to those who meet certain exemptions, such as those who are working at least 20 hours per week or are participating in federal work study programs. USDA also denied waivers to temporarily adjust other practices, including [application processing](#), [quality control](#), [reporting](#), and [other](#) aspects of program rules.

TABLE 1

State Emergency Allotments and Extensions by Month, as of September 22, 2020

State	March	April	May	June (Extension)	July (Extension)	August (Extension)	September (Extension)
Alabama	X	X	X	X	X	X	X
Alaska		X	X	X	X	X	X
Arizona		X	X	X	X	X	
Arkansas	X	X	X	X	X	X	X
California	X	X	X	X	X	X	X
Colorado	X	X	X	X	X	X	X
Connecticut	X	X	X	X	X	X	X
Delaware	X	X	X	X	X	X	X
District of Columbia	X	X	X	X	X	X	X
Florida	X	X	X	X	X	X	X
Georgia	X	X	X	X	X	X	X
Guam	X	X	X	X	X	X	X
Hawai'i	X	X	X	X	X	X	X
Idaho	X	X	X	X	X	X	X
Illinois		X	X	X	X	X	X
Indiana		X	X	X	X	X	X
Iowa		X	X	X	X	X	X
Kansas	X	X	X	X	X	X	X
Kentucky		X	X	X	X	X	X
Louisiana	X	X	X	X	X	X	X
Maine		X	X	X	X	X	X
Maryland		X	X	X	X	X	X
Massachusetts	X	X	X	X	X	X	X
Michigan	X	X	X	X	X	X	X
Minnesota		X	X	X	X	X	X
Mississippi	X	X	X	X	X	X	X
Missouri	X	X	X	X	X	X	X
Montana		X	X	X	X	X	X

TABLE 1

State Emergency Allotments and Extensions by Month, as of September 22, 2020

State	March	April	May	June (Extension)	July (Extension)	August (Extension)	September (Extension)
Nebraska	X	X	X	X	X		
Nevada	X	X	X	X	X	X	X
New Hampshire		X	X	X	X	X	X
New Jersey	X	X	X	X	X	X	X
New Mexico	X	X	X	X	X	X	X
New York	X	X	X	X	X	X	X
North Carolina	X	X	X	X	X	X	X
North Dakota	X	X	X	X	X	X	X
Ohio	X	X	X	X	X	X	X
Oklahoma	X	X	X	X	X	X	X
Oregon		X	X	X	X	X	X
Pennsylvania	X	X	X	X	X	X	X
Rhode Island	X	X	X	X	X	X	X
South Carolina	X	X	X	X	X	X	X
South Dakota	X	X	X	X	X	X	X
Tennessee		X	X	X	X	X	X
Texas		X	X	X	X	X	X
Utah		X	X	X	X	X	X
Vermont	X	X	X	X	X	X	X
Virgin Islands		X	X	X	X	X	X
Virginia	X	X	X	X	X	X	X
Washington	X	X	X	X	X	X	X
West Virginia		X	X	X	X	X	X
Wisconsin	X	X	X			X	X
Wyoming		X	X	X	X	X	X
Total	35	53	53	52	52	52	51

Note: 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 be approved for a September allotment until the end of September.)

TABLE 2

Pandemic EBT and Online Purchasing Pilots, as of September 22, 2020

State	Provide benefits for households with children missing school meals in 2019-2020 school year* (P-EBT)	Provide benefits for households with children missing school meals in August-September 2020 (P-EBT)	Pilot an online purchasing program
Alabama	X		X
Alaska	X		
Arizona	X		X
Arkansas	X		X
California	X	X	X
Colorado	X		X
Connecticut	X		X
Delaware	X		X
District of Columbia	X	X	X
Florida	X		X
Georgia	X		X
Guam			
Hawai'i	X	X	X
Idaho	X		X
Illinois	X	X	X
Indiana	X	X	X
Iowa	X		X
Kansas	X		X
Kentucky	X	X	X
Louisiana	X		
Maine	X		
Maryland	X	X	X
Massachusetts	X	X	X
Michigan	X		X
Minnesota	X		X
Mississippi	X		X
Missouri	X		X
Montana	X	X	
Nebraska	X	X	X
Nevada	X		X
New Hampshire	X		X
New Jersey	X	X	X
New Mexico	X	X	X
New York	X		X
North Carolina	X	X	X
North Dakota	X		X
Ohio	X	X	X
Oklahoma	X		X
Oregon	X		X
Pennsylvania	X		X
Rhode Island	X	X	X
South Carolina	X		X

TABLE 2

Pandemic EBT and Online Purchasing Pilots, as of September 22, 2020

State	Provide benefits for households with children missing school meals in 2019-2020 school year* (P-EBT)	Provide benefits for households with children missing school meals in August-September 2020 (P-EBT)	Pilot an online purchasing program
South Dakota	X		X
Tennessee	X	X	X
Texas	X		X
Utah	X		X
Vermont	X		X
Virgin Islands	X		
Virginia	X	X	X
Washington	X		X
West Virginia	X		X
Wisconsin	X		X
Wyoming	X		X
Total	52	17	47

*The law authorizes P-EBT through September (fiscal year 2020). USDA has so far approved most states only through the 2019-2020 school year but has indicated that states can request approval to provide benefits for school districts that are operating virtual programs in August and September and has started approving states to provide benefits for those months. Legislation is needed to extend the program past September and to address the hybrid virtual and in-person approaches many school districts are operating under for the current school year.

TABLE 3

USDA-Approved SNAP Operations Waivers and Options Under Families First, as of September 22, 2020

Listed by last month approval is in effect

State	Extend certification periods, adjust reporting requirement	Adapt telephonic signature requirements	Waive initial/recertification interview and other interview adjustments
Alabama			Aug.
Alaska	Aug.	Aug.	Aug.
Arizona	Jun.	Sep.	Jun.
Arkansas	May	Jul.	Jun.
California	May	Sep.	Aug.
Colorado	Jun.	Jul.	Jun.
Connecticut	Jun.	Sep.	Aug.
Delaware	Aug.	Sep.	Aug.
District of Columbia	Aug.	Jul.	Aug.
Florida	Aug.		Jun.
Georgia	Aug.		Aug.
Guam	Jun.		Jun.
Hawai'i	Jun.	Sep.	Jun.
Idaho	May		
Illinois	Sep.	Sep.	Aug.
Indiana	Aug.		Aug.
Iowa	Aug.	May	Jun.
Kansas	Jun.		Aug.
Kentucky	Aug.		Aug.
Louisiana	Aug.		Sep.
Maine	Jun.	Aug.	Aug.
Maryland	Jun.		Jul.
Massachusetts	Jun.	Aug.	Aug.
Michigan	Jun.	Sep.	Aug.
Minnesota	Aug.	Sep.	Jun.
Mississippi	Jun.		Aug.
Missouri	Aug.		Jun.
Montana	Jun.		Jun.
Nebraska	May		May
Nevada	Jun.		Sep.
New Hampshire	Jun.	Sep.	
New Jersey	Sep.	Sep.	Sep.
New Mexico	Jun.	Sep.	Jun.
New York	Aug.	Dec.	Aug.
North Carolina	Aug.	Dec.	Aug.
North Dakota			Jun.
Ohio	Jun.		Jun.
Oklahoma	Jun.		Jun.
Oregon	Aug.	May	Aug.
Pennsylvania	Aug.		Aug.

TABLE 3

USDA-Approved SNAP Operations Waivers and Options Under Families First, as of September 22, 2020

Listed by last month approval is in effect

State	Extend certification periods, adjust reporting requirement	Adapt telephonic signature requirements	Waive initial/recertification interview and other interview adjustments
Rhode Island	Jun.	Jun.	Aug.
South Carolina			Jul.
South Dakota	Jun.		Jun.
Tennessee			Aug.
Texas	Aug.		Aug.
Utah			
Vermont	May		May
Virgin Islands	Aug.		Jun.
Virginia	Jun.	Jun.	Aug.
Washington	Aug.		
West Virginia	Jun.		Jun.
Wisconsin	Jun.		Aug.
Wyoming			
Total	47	23	48

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

Notes: Puerto Rico, American Samoa, and the Northern Mariana Islands receive block grants in lieu of participating in SNAP; this funding structure limits the ability of these programs to expand to meet increased need. Both the Families First Coronavirus Response Act and the Coronavirus Aid, Relief, and Economic Security Act provided modest additional funding for nutrition assistance for those territories. The listed July and August interview adjustment waivers do not include more limited approvals for waivers of the requirement for states to provide face-to-face interviews upon a household's request or to not require households eligible for expedited service to complete an interview prior to approval.

TABLE 4

State USDA-Approved, Limited Operations Waivers Under Families First for Fall 2020

As of September 22, 2020

State	Core verification and interview adjustment (September 1-December 31, 2020)	Periodic report flexibility for non-extended recertification cases (September 1-December 31, 2020)
Alabama		
Alaska		
Arizona		
Arkansas		
California		
Colorado		
Connecticut		
Delaware		
District of Columbia		X
Florida		
Georgia		
Guam		
Hawai'i		
Idaho		
Illinois		
Indiana		
Iowa		
Kansas		
Kentucky		
Louisiana		X
Maine		
Maryland		
Massachusetts	X	X
Michigan	X	
Minnesota		X*
Mississippi		
Missouri		
Montana		X*
Nebraska		
Nevada		
New Hampshire		
New Jersey		
New Mexico		
New York	X	
North Carolina		
North Dakota		
Ohio		X*
Oklahoma		
Oregon	X	
Pennsylvania	X	X
Rhode Island		X
South Carolina		

TABLE 4

State USDA-Approved, Limited Operations Waivers Under Families First for Fall 2020

As of September 22, 2020

State	Core verification and interview adjustment (September 1-December 31, 2020)	Periodic report flexibility for non- extended recertification cases (September 1-December 31, 2020)
South Dakota		
Tennessee		
Texas	X	
Utah		
Vermont		
Virgin Islands		
Virginia	X	
Washington		
West Virginia		X
Wisconsin		
Wyoming		
Total	7	9

Source: USDA Food and Nutrition Service

Note: "Core verification and interview adjustment" waivers allow states to streamline the recertification process by only interviewing at least half of non-elderly or disabled households and potentially extending the certification period for some households. "Periodic report flexibility for non-extended recertification cases" allows states to process recertifications for households that did not have their renewal deadline extended due to earlier waivers in a streamlined fashion, without an interview and with minimal verifications. For more information, see: <https://www.fns.usda.gov/disaster/pandemic/covid-19/snap-application-waivers>. *These states were approved for this waiver for October-December 2020.

¹ 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; allowed states not to offer a face-to-face interview or grant one upon request; and allowed states to certify households with very low income eligible for expedited service to be approved without an interview. The original waivers included all three, but some extensions for July and beyond include just some of those components.

² Here is a brief summary of many of these waivers, all of which can be found at Food and Nutrition Service, “SNAP: COVID-19 Waivers by State,” <https://www.fns.usda.gov/disaster/pandemic/covid-19/snap-waivers-flexibilities>.

USDA has [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, either by mistake or intentionally — SNAP state agencies must collect the amount overpaid, unless pursuing the claim is not cost effective.) All of these states have had these waivers extended through June, and some 13 states have received July extensions, with smaller numbers approved for extensions past July. USDA has also approved one state (California) for an extension on submitting data to USDA on claims collection.

At least 23 states have been [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 have had these waivers extended through June and fewer states were extended through July, August, September, and October.

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), and with fewer states approved past June.

USDA has [approved](#) at least five 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.

Three states have received [approval](#) to extend the period of time granted to households that have attempted but are unable to provide a Social Security number, and these waivers have been extended through September or October.

At least two states have [received approval](#) to delay notices that states must issue to households with multiple EBT card replacement requests.

Three states have [received](#) waivers to allow certain community partners who 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, and USDA has allowed these extensions through September.

At least four [states](#) have been approved to suspend in-person collection of applications and verification documents for August and September.

At least two states have been approved to streamline the process to determine whether individuals are unable to meet certain work requirements. (Though the Families First Coronavirus Response Act 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, and the other streamlines this good-cause determination for individuals subject to SNAP’s general work requirements.)