

# Temporary Emergency COVID-19 Rule Changes

King County Coalition on Homelessness

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# Food Assistance (SNAP/FAP)

## Emergency food supplements:

- WAC 388-437-0005;
- Applies to **most** households not already receiving maximum food allotment for household size;
- Automatically authorized for all qualifying households that were active for March 2020 and April 2020;
- Not authorized beyond April 2020;
- Amount will make up difference to get household to maximum allotment amount for their household size regardless of income previously decreasing amount;
- Also applies to households prorated during month of application despite applying later in the month;
- DOES NOT apply to households with already reduced benefits due to repaying an overpayment (recoupment);
- Will **not** be subject to repayment;
- This process will not be applicable to households that add a person to the assistance unit in the middle of the certification. Normal rules for adding a person will still apply, including the added person being denied for the month of application and eligible starting the following month

# Student status rules and COVID-19

- DSHS is currently operating under current student status eligibility rules for food assistance outlined in WAC 388-482-0005;
- Regardless of a student losing their job, having reduced work hours or losing work study due to COVID-19, regular student status rules still apply and if the student does not meet the eligibility criteria, they are not eligible for food assistance;
- Federal Food and Nutrition Services (FNS) has denied the state of Washington's request for temporary waiver of student eligibility rules for the food assistance program and has determined that the state must currently operate under normal eligibility rules

# ABAWDs and COVID-19

- Exemption given to households who have not used their 3 non-qualifying months prior to March 2020;
- Good cause coding will exempt non-qualifying months for only March 2020 and April 2020;
- Emergency rule currently only applies for non-qualifying months of March 2020 and April 2020. These will be the only 2 months exempted unless Legislature and/or federal government states otherwise;
- Affected households were notified by mail of the good cause given, but that rules will be subject to change;
- ABAWDs are **currently** exempt from participation rules until Legislature and/or federal government states otherwise;
- Any other changes, clients will be notified via mail

**\*\*\* Update as of April 15, 2020 – any ABAWD that submits an application or reapplication as of March 18, 2020 (date the Families First Coronavirus Response Act passed Senate legislation and was signed into law by President Trump) will not need to meet requalification rules in order to regain eligibility for food assistance and may be eligible as long as they meet all other requirements for the food assistance program. This includes those who have already used their 3 non-qualifying months.**

# TANF/SFA Time Limit Extension (TLE) Temporary Emergency changes for COVID-19

- Households closed because of exhausting 60-month lifetime TANF/SFA time limits may reapply and have TLE granted if they meet all of the following conditions...
  - Do not meet another TLE hardship criteria;
  - Are still unemployed;
  - Do not qualify for unemployment benefits;
  - Experience a hardship for their families during COVID-19 timeframe; **AND**
  - Are in need of TANF/SFA cash assistance
- Rule effective April 1, 2020 through "... when public health conditions allow for the resumption of normal activity;
- Action will not be automated and will be reviewed on a case-by-case basis for active cases that have used up the 60-month limit already or for those reapplying. This will be an internal process;
- Impacted households received letters regarding why they were reinstated;
- Households still subject to rules regarding Individual Responsibility Plans (IRP) and level of participation will be gauged on a case-by-case basis depending on current COVID-19 situation for work partners and participating agencies;
- Domestic Violence advocacy services are still in place for households that may want or need this support and will be part of IRP if need be

# “Waived” Reporting Requirements for TANF/WorkFirst During COVID-19

- Reporting requirements for all programs, including TANF/SFA and WorkFirst have **NOT** been waived at this time;
- All households are to still report any reportable changes in their household circumstances, based on what program(s) they receive assistance from, as normal, following what is outlined in WACs 388-418-0005 and 388-418-0007 within the timeframes cited in the WACs as normal

# Temporary Emergency Income Verification rules during COVID-19

- Verification requirements **have not** been waived;
- Requirements may currently be a bit more lenient, but are still in place;
- Clients are still required to provide verification of current, ongoing, reduced and stopped income if available and able;
- If the client cannot provide verification, the Department will...
  - Attempt to contact the employer
    - If employer is not available due to business being closed due to COVID-19, Department will attempt to use other online resources to verify
- If unable to verify, Department (at its discretion) may accept client statement for verification if it reasonably supports current circumstances;
- Department will inform client of possibility of overpayment if reported amount is or turns out to be inaccurate after the fact;
- Department will remind clients that once income of any source resumes or increases (if active employment) and in goes over 130% FPL for the household size, household is required to report this information to DSHS as of the 10<sup>th</sup> day of the following month in which the income exceeded 130% FPL

# Disaster Cash Assistance Program (DCAP) during COVID-19 state of emergency

- Program will be administered as of Friday, April 17, 2020;
- Follows Consolidated Emergency Assistance Program (CEAP) income and resource standards and is authorized through CEAP funding;
- Administered under WACs 388-436-0055 and 388-436-0060;
- If already received CEAP within the 12 month period that the client is applying for DCAP, DCAP is not available;
- Available to a household 1 time out of a 12 month period;
- Must have suffered a loss of income or property related to COVID-19. No requirement that applicant is unable to return to their home during COVID-19 state of emergency declaration as it is in effect in all Washington Counties;
- Available to households without children with limits based on household size;
- Immigration status and lack of SSN is not a factor of eligibility;
- Households must apply for other available/applicable sources of income first (ex. Unemployment Compensation);
- Households must apply for and be determined ineligible for other cash programs first (ABD, TANF, SFA);
- Program availability ends when State of Emergency period ends

# Best ways to provide income verification timely

- Drop it off in a physical CSO drop box at any office;
- Fax it in;
- Mail it in
- Ask employer to call employer verification line and provide information verbally through voice message ([1-877-309-9757](tel:1-877-309-9757))
  - This phone number is for 3<sup>rd</sup> parties only for the purposes of verification, **not** for clients;
  - Employer is to leave client's full name and client ID# (used as the "reference number") along with the information/verification being provided

# Tips for filling out an application for benefits remotely

- Go to [www.washingtonconnection.org](http://www.washingtonconnection.org) to fill out the application online;
- Drop off physical application in a drop box at most CSOs (some offices do not have drop boxes because of physical location of office);
- Mail in application;
- Fax application;
- Provide as much information/verification as possible with application or immediately following submission;
- Complete telephonic interview timely (clients will have to call in, DSHS will not do outbound call without already completed and signed application in case record);
- Provide needed pending information within the provided timeframe given (depending on program[s] applied for)

# Scenario Questions and Answers \*\*\*

## Scenario #1:

**Q:** Sally was previously terminated from her food benefits for not fulfilling the work requirements for ABAWDs. What should I tell her and if I encourage her to reapply, what can I do to increase her chances of approval?

**A:** As of March 18, 2020, you can reapply for food with no need to meet ABAWD rules as long as you meet all other eligibility criteria for food assistance. This exemption and emergency rule is only be temporary though and once the emergency rules expire, normal rules will apply again. Once the normal rules go back into effect, you will be terminated from food again unless you meet the requalification rules or become exempt from ABAWD requirements.

## Scenario #2:

**Q:** John is required to attend weekly behavioral health check in meetings as a part of his IRP for TANF benefits. The clinic that he goes to is closed because of COVID-19 and is offering remote meetings instead. John lacks reliable access to phone and internet services, making these virtual appointments difficult to keep. What would you advise?

**A:** Clients are still responsible to fulfill the requirements of their IRPs if services for their activities are available. If available services are not accessible to the client due to lack of resources to access services (ex. no internet service, computing equipment, phone service) they must communicate this to their WorkFirst case manager or social worker to reassess and redetermine participation during the current state of emergency declaration. If the client does not communicate this limitation to their case manager or social worker, there is nothing that the Department can do but hold the client to the agreed upon IRP activities.

## Scenario #3:

**Q:** Alice is recently unemployed from a local business that doesn't report wages electronically and doesn't provide physical wage stubs. She has previously used direct deposit and only has electronic records of payment confirmation. Alice would like to apply for assistance, however she does not have internet access and is concerned about using the limited minutes on her phone to apply. What would you advise?

**A:** DSHS will attempt to verify final gross wages with the former employer, but if DSHS is unsuccessful in obtaining the verification, then it is up to the client to provide. DSHS may take into consideration what appears in a bank statement as a direct deposit, but this would only be a reflection of net wages, but by WAC it must use gross income for eligibility determination. The former employer may leave the verification of final income and stop work information on the Department's verification line at 1-877-309-9757, but if the employer does not do so, then it is still up to the client provide the verification.

# Questions?