

Changes to SNAP Benefits due to the COVID-19 Pandemic

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Issue

This report describes state and federal actions related to the Supplemental Nutrition Assistance Program (SNAP) and the COVID-19 pandemic.

Summary

Both the state and federal government have made numerous changes to SNAP in response to the COVID-19 pandemic. Most of these changes were authorized by the federal Families First Coronavirus Response Act (FFCRA) ([P.L. 116-127](#)), which was signed into law on March 18. Among other things, FFCRA authorizes the United States Department of Agriculture (USDA) to provide waivers and other flexibilities for states in administering SNAP during the pandemic.

The act allows state SNAP agencies to apply for waivers to provide emergency allotments to increase SNAP benefits for certain households. Connecticut's state SNAP agency, the Department of Social Services (DSS) received this waiver and distributed increased benefits on April 9 (for March) and April 20 (for April).

DSS is using existing authority to extend certification periods, allowing households who would otherwise have to renew their SNAP benefits in March, April, or May, to continue to receive benefits until September, October, or November, respectively. Additionally, FFCRA allows states to apply for waivers to extend deadlines for households to submit periodic reports to state SNAP agencies. DSS also received this waiver.

The act also allows states to waive SNAP applicant interview requirements provided they submit a request to the regional USDA Food and Nutrition Services (FNS) office indicating their preferred alternatives. DSS is waiving or postponing interview requirements for SNAP applicants, renewals, and expedited cases.

Program Structure

The federal government pays the full cost of SNAP benefits. State agencies operate and administer the program and share administrative costs with the federal government.

FFCRA additionally allows states to submit plans to distribute additional benefits to households with children who are eligible for free or reduced-price lunch. Like SNAP, these benefits would be distributed via electronic benefit transfer (EBT); thus they are referred to as Pandemic-EBT or P-EBT. DSS has not submitted a P-EBT plan, but according to [an April 4 CT Mirror article](#), DSS is working with the state Department of Education to set up a P-EBT program.

Finally, FFCRA waives time limits for able-bodied adults without dependents (ABAWDs) who would otherwise lose SNAP benefits after three months unless they met certain requirements. It also extends due dates for states to submit certain case data used to assess program validity for quality control purposes. USDA provides more information [here](#).

DSS also submitted waiver requests [to make higher education students temporarily eligible for SNAP benefits through August 2020](#) and [allow all SNAP applicants to receive expedited benefits](#). USDA denied these requests and others in a [mass denial letter](#) to state agencies on April 10.

Emergency Allotments

FFCRA allows state SNAP agencies to apply for waivers to provide emergency allotments to increase SNAP benefits for certain households. USDA has granted waivers to [at least 41 states \(including Connecticut\), plus Washington, DC and Guam](#), as of April 3. The waivers allow these jurisdictions to issue emergency allotments based on the U.S. Health and Human Services (HHS) secretary's [declaration of a public health emergency](#), provided the state has also issued an emergency or disaster declaration. (Connecticut declared civil preparedness and public health emergencies on March 10.)

Normally, SNAP benefits are calculated based on a formula that subtracts a portion of the household's net monthly income from a maximum monthly benefit. The maximum monthly benefit is established in federal law and based on the cost of purchasing a nutritionally adequate, low-cost diet. Under this formula, a household with no net monthly income receives the maximum benefit. (See [OLR Report 2016-R-0106](#) for more information.)

Emergency allotments generally provide all ongoing SNAP households the maximum monthly benefit regardless of income. Households already receiving the maximum benefit would not see a change in benefit amount. For a family of three, the maximum monthly allotment is \$509 in 2020.

According to an [April 11 memo](#) from USDA (see question 5 on p. 1), it is currently approving only two months of emergency allotments due to funding constraints and will communicate any possibility for extensions as more information is available. USDA has thus far approved emergency allotments to

Connecticut for March and April. DSS issued emergency allotment benefits to SNAP households via their EBT cards on April 9 (for March) and April 20 (for April). According to DSS, approximately 97,000 households will receive the additional benefits, which will total more than \$28 million over the two-month period. DSS provides more information on [its website](#).

Caseload

According to USDA, 211,588 Connecticut households participated in SNAP as of December 2019. According to DSS, SNAP applications have recently quadrupled in volume.

Recertification and Periodic Reporting

The amount of time a household can receive SNAP benefits without renewing eligibility is known as a certification period. For most households, federal regulations require states to assign certification periods of at least 6 months ([7 CFR § 273.10\(f\)\(3\)\(i\)](#)), but allow longer periods of up to 12 months for established cases and up to 24 months for households with members who are elderly or living with disabilities ([7 CFR § 273.10\(f\)\(5\)](#)).

According to USDA's [April 11 guidance](#) (see question 3 on p. 4), states with shorter certification periods (e.g., six months) may increase them up to these maximums without a waiver. Connecticut uses a six-month certification period for most households. Due to the pandemic, DSS extended certification periods by six months, allowing households who would otherwise have had to renew in March, April, or May, to continue to receive benefits until September, October, or November, respectively.

Federal regulations also require certain households to submit periodic reports at least every six months if their certification period exceeds six months ([7 CFR § 273.12\(a\)\(5\)\(iii\)](#)). FFCRA allows USDA to grant waivers to states to adjust deadlines for SNAP participants to submit periodic reports. As authorized by the [USDA's approval letter](#), DSS adjusted periodic reporting requirements for households with a report due in March, April, or May. DSS describes this extension on [its website](#).

Interviews

In accordance with FFCRA, USDA is also allowing states to adjust interview requirements for SNAP applications and recertifications.

Federal regulations generally require state SNAP agencies to interview applicants before providing benefits ([7 CFR §§ 273.2\(a\)\(2\) & 273.2\(e\)](#)). USDA is allowing states to forgo the interview, provided the agency verifies the applicant's identity and certain other required information.

Federal regulations also require state SNAP agencies to provide "expedited service" (i.e., benefits within 7 days of application) to certain applicants (e.g., households with less than \$150 in monthly gross income and \$100 in assets) ([7 CFR § 273.2\(i\)](#)). USDA is similarly waiving interview requirements for these applicants, provided the agency verifies the applicant's identity and attempts to contact the household for an interview.

Additionally, USDA is waiving federal regulations that require state SNAP agencies to offer face-to-face interviews, at the applicant's request, to households applying for or recertifying SNAP benefits. [USDA guidance](#) issued on March 26 provides more information.

Correspondingly, DSS is waiving interviews for SNAP applications received from March 1 to May 31, as long as applicants provide other necessary information (e.g., proof of income or job loss). DSS is also waiving interview requirements for expedited cases, provided other information is complete. More information is available on the department's [website](#).

Pandemic Electronic Benefit Transfer (P-EBT)

FFCRA allows states to submit plans for temporary emergency eligibility and benefit standards to allow households with children who receive free or reduced-price meals at school to receive the value of the school meals via SNAP EBT. Eligible households include those with a child or children who would receive free or reduced-price school meals under federal law if not for a school closure of at least five consecutive days during a public health emergency designation. States must include in their plan how they will obtain enrollment data from schools to determine eligibility and match students to any existing SNAP cases. [USDA guidance](#) issued on March 20 provides more information.

DSS has not submitted a P-EBT plan, but according to [an April 4 CTMirror article](#), the department is working with the state Department of Education to set up a P-EBT program.

Able-Bodied Adults Without Dependents (ABAWDs)

Under federal law, able-bodied adults between the ages of 18 and 49 who have no dependents are subject to a time limit for receiving SNAP benefits unless they meet additional work requirements (e.g., work 20 hours per week) ([7 CFR § 273.24](#)). Generally, if they do not meet the work requirements, these ABAWDs can receive only three months of SNAP benefits in a 36-month period.

FFCRA suspends the three-month time limit for out-of-work ABAWDs except for those who are offered a slot in a work program provided by the state (e.g., “workfare”). The suspension applies nationwide from April 1 to the end of the month after the month in which the U.S. HHS secretary’s emergency declaration is lifted. USDA provides more information [here](#).

Connecticut had a partial waiver of ABAWD time limits that applied to many municipalities (see [OLR Report 2016-R-0107](#) for more information). As a result, the FFCRA provision suspending ABAWD time limits will continue the policy in place for towns that were under Connecticut’s partial waiver and extend the policy to towns that were not under the partial waiver. (Under [new federal regulations](#), the partial waiver expired on March 31 and, as noted above, the FFCRA ABAWD provision is effective April 1.)

Resources

CT Mirror, [“CT Enrollment in food stamps soars, but there’s a wait for benefits,”](#) April 3, 2020.

Kaiser Family Foundation, [The Families First Coronavirus Response Act: Summary of Key Provisions](#), March 23, 2020.

Republican-American, [“Applications for SNAP benefits surge as families struggle amid pandemic,”](#) April 11, 2020.

USDA, [SNAP Pandemic Planning Guidelines](#), date unknown.

USDA, [SNAP State by State COVID-19 Waivers](#), April 10, 2020.

USDA, [Supplemental Nutrition Assistance Program – Questions and Answers, COVID-19, Set #1](#), April 11, 2020.

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