

## Extend Certification Periods WAIVER REQUEST

1. **Waiver serial number:**
2. **Type of request:** Initial
3. **Regulatory citation:** 7 CFR 273.10(f)
4. **State:** KY
5. **Region:** SERO
6. **Regulatory requirements:** Federal regulations require that States assign the longest certification period for households. The certification period should not exceed a period of twelve months.
7. **Proposed alternative procedures:** The State will extend the certification period of all SNAP cases due for renewal or periodic report in the months of December 2023 through May 2024.  
**State specific proposed alternative procedures, if applicable:** none
8. **Justification for request:** Kentucky utilizes an integrated eligibility system which includes SNAP, Medicaid, Child Care, and TANF. Coming out of the pandemic Kentucky was experiencing difficulty in filling field staff vacancies. Kentucky has had great success recently in filling these vacancies and working toward the challenge of getting them trained. To address the training needs and get this large number of staff trained as quickly as possible changes were made to the training plan to allow new staff to be trained in both SNAP and Medicaid at the same time. DCBS currently has 1,378 field staff. Of those, 569 are currently fully trained in only one program, 404 staff are in training and Non-Case Decision, which means all case actions require review by senior staff before being fully processed. The staffing realities combined with the 40% increase in workload brought about with the beginning of the PHE unwinding period and return of Medicaid renewals have resulted in a backlog of processing tasks. Kentucky is receiving more tasks daily than are being processed. The backlog increases by approximately 500 tasks each day. Extending the SNAP certification periods for households due in December through May beyond the PHE unwinding period will allow the households to continue to receive the assistance they need and will allow the state agency to get a significant percentage of the workforce fully trained with case decision in SNAP.
9. **Caseload information, including percent of caseload and description of population expected to be affected by this waiver:** As of October 2023, Kentucky's SNAP caseload consisted of 257,619 active SNAP cases.

- a. **Dec '23** -extend 16,073 recertifications (6% of caseload) and 13,349 (5%) renewals by periodic report
- b. **Jan '24**- extend 16,203 (6%) recertifications and 13,298 renewals (5%) by periodic report
- c. **Feb '24**- extend 13,940 (5%) recertifications and 15,132 (6%) renewals by periodic report
- d. **Mar'24**- extend 10,497 (4%) recertifications and 16,497 (6%) renewals by periodic report
- e. **Apr '24** -extend 6,585 (2%) recertifications and 8,795 (2%) renewals by periodic report
- f. **May '24** -extend 7,930 (3%) recertifications and 4,614 (2%) renewals by periodic report

**10. Anticipated impact on households and State agency operations:** Citizens will continue to receive monthly SNAP benefits and will not be at risk of their case closing in error and waiting for corrections to resume benefits. The additional months will allow staff training progress resulting in more workers with case decision to process tasks.

**11. Anticipated implementation date and time period for which waiver is needed:**  
Immediately, for all coming due recertifications and periodic reports.

**12. Proposed quality control review procedures:** No additional QC measures are needed.

**13. Name, title, and email of requesting official:**

Name: Lesa Dennis  
Title: DCBS Commissioner  
Email: [Lesa.Dennis@ky.gov](mailto:Lesa.Dennis@ky.gov)  
Signature:   
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**14. Date of request:** November 28, 2023

**15. State agency contact:**

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**16. Regional Office contact** (to be completed by FNS Regional Office):

Name:  
Email:  
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