

FNS INITIAL WAIVER REQUEST

Periodic Report Flexibility for Non-Extended Recertification Cases Waiver

1. Waiver serial number:

2. Type of request: Initial

3. Regulatory citation: 7 CFR 273.14(c) (3)

4. Secondary Regulatory citation: None.

5. State: Massachusetts

6. Region: Northeast

7. Regulatory requirement:

7 CFR 273.14(c) (3) Interview. As part of the recertification process, the State agency must conduct an interview with a member of the household or its authorized representative at least once every 12 months for households certified for 12 months or less.

8. Description of alternative and state-specific procedures:

The state intends to replace the regular recertification process with the periodic report process for all households who did not have their original certification end dates extended. This includes using the periodic report form and process, inclusive of not requiring interviews. This process includes contacting households when information is lacking, questionable or contradictory. If enough information has been collected, either through available data sources or through provided verifications, the household will be recertified without a required interview. These proposed procedures are already established and understood by field staff. Approving this request would allow the state to streamline the recertification process to maximize workforce capacity during the period of increased workloads associated with the certification extensions. The state is confident this approach strikes the important balance of maintaining program access and program integrity in SNAP operations ensuring all eligible households receive appropriate benefit amounts.

All households who had their original certification end dates extended, who are not covered by the state's existing elder disabled recertification interview waiver, will be required to complete a recertification interview in accordance with regular protocol. No modifications to procedures will be made to Bay State CAP households or Public Assistance (TANF)/SNAP households.

9. Justification for Request:

At the start of the COVID-19 public health emergency, FNS granted the state a waiver to extend certification periods for cases due to recertify in the months of April – June 2020. This was in response to the state's diminished workforce capacity, coupled with a 400% increase in SNAP applications. This waiver was essential to ensuring no families lost access to benefits during this crisis. An unfortunate side effect of this waiver is an increased amount of work associated with periodic reports and recertifications now concentrated into the timeframe of October through December 2020. Projections show that the number of recertifications due in October, November and December are up 71%, 79% and 70% respectively from the last year. The proposed alternative procedures will allow the state the flexibilities necessary to process this work. Additional certification period modifications will be necessary to avoid this situation this from happening

annually which will require system enhancements. Due to the complexity of these changes, the state will not be able to incorporate them as part of the solution to address the increased work for October – December 2020 (please see attached template containing the state’s proposed transition plan).

Per FNS, to operate this adjustment, States must demonstrate need through data meeting at least one of the following criteria:

- 50 percent increase in anticipated recertification applications for the month(s) requested, compared to the same month(s) last year;
- 50 percent increase in certification actions (such as recertifications or periodic reports), for the month(s) requested, compared to the same month(s) last year;

Massachusetts meets both above criteria for the months of October - December 2020 as demonstrated by the table included in the caseload information section.

10. Anticipated impact on households and State Agency Operations:

As it stands, the projected recertification and periodic report workload for the months of October – December exceeds the Department’s workforce capacity. This is primarily due to the extension of certification dates from April – June 2020 enabled by the FNS blanket certification extension waiver. The proposed modified procedures will allow the Department to maximize its workforce capacity to best ensure continuity of benefits for all eligible households.

11. Caseload Information:

Scheduled Recertifications and periodic reports as of August 7, 2020

Month	Total	Previous Year	% Change
1-Oct-20	58,775	34,458	71%
1-Nov-20	59,990	33,550	79%
1-Dec-20	55,771	32,817	70%

12. Time Period for Waiver: October 2020 – December 2020

13. Quality Control Review procedures:

The state intends to consider any modifications granted through approval of this waiver in the development of its FY21 Management Evaluation QC sampling plan.

14. Date of State Agency's request: August 14, 2020

15. Anticipated implementation date: ASAP for cases due to recertify for October – December 2020

16. State Agency contact (name/email/telephone):

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17. FNS regional contact (name/email/telephone):

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18. Signature and Title of Requesting Official:



Brittany Mangini,
Director of Food Security and Nutrition Programs
Date: August 14, 2020

SNAP COVID Adjustment Request and Transition Plan Summary

State Agency and Region:

Massachusetts Department of Transitional Assistance

Northeast Region

What Adjustment(s) is the State Requesting

- *Periodic Report Flexibility for Non-Extended Recertification Cases Waiver*

Demonstrated Need for Extension of the Adjustment

The state is projecting that for each month associated with the initial spikes caused by COVID-19 there will be due, *on average*, approximately 12,000 more recertifications and interim reports, and approximately 14,500 more interviews, than in the comparable time period from last year.

Demonstrated in the attached waiver is a snapshot of the anticipated volume of periodic reports and recertifications for the months of October – December of 2020. The state is anticipating a 71%, 79% and 70% increase in workload associated with recertifications and periodic reports for October, November and December 2020, respectively.

How Does the State Plan to Transition to the New Normal

Massachusetts state government is still very much in the midst of developing its response to the COVID-19 public health emergency and the consequent economic fall-out. The state recently paused re-opening plans due to an uptick in COVID-19 infections. There is an extensive planning process underway across state government about how state services, including those offered by DTA, will be delivered in a future, post-COVID world. This planning includes how in-person services will be delivered, the role of remote work and technology as well as numerous other factors. Plans at the state level are still underway and, as these further develop, DTA will be in a position to provide FNS a more detailed plan for its future operational structure.

State's response to workload associated with increased caseload size

In the meantime, DTA's current plan to manage the increase in workload includes:

- On-boarding 53 new SNAP eligibility workers who will complete training by October 2020;
- Internal promotional opportunities for a minimum of another 50 administrative staff to become SNAP eligibility workers;
- Implementation of Optical Character Recognition technology to significantly automate our paper interim report process;
- Evaluation of technologies and system supports necessary to establish the Community Partner Interview demonstration program;
- Recent conversion of more than 19,000 cases to Bay State CAP, further streamlining operations afforded by our Social Security Administration Combined Application Project; and
- Implementing the necessary technology to allow adoption of the telephonic signature option in the fall which will also streamline operations.

State's proposal to address the acute concentration of recertifications and periodic reports

To address the recertifications and periodic report work concentrated in specific periods each year, the state will need flexibility to strategically push out some certification end dates to balance the workload. The state is proposing to only move end dates, as necessary, to months with fewer scheduled recertifications, and to allow periodic reporting to balance out the number of interviews each month. The state recognizes the complexity and nuanced nature of this approach and wishes to work closely with the regional office on its implementation.

To address this problem the state proposes the following;

- leveraging the months with smaller numbers of recertifications and periodic reports due;
- modifying certification periods to establish a reasonable balance, considerations include;
 - o identifying case types for which the risk of pushing out certification end dates is minimal
 - o identifying cases for which an application or recertification has been completed within the past year (or within two years for ESAP cases)
 - o Additional factors to be considered include but are not limited to: Stability of benefit over multiple recertifications, source(s) of income verifiable through databases and/or households with the minimum benefit;
- broadened use of periodic reporting to contact households in a streamlined way; and
- pushing out recerts for six months for a low risk subset of cases and using a periodic report at month 12.