



April 13th, 2020

Julie Mikkelson, Director
Supplemental Nutrition Assistance Program
USDS, Food and Nutrition Service
77 West Jackson Blvd 20th Floor
Chicago, IL 60604-3507

Dear Julie Mikkelson,

Attached is a waiver request to modify activities for Minnesota's SNAP Education Program in response to the critical food emergency need due to COVID-19. On March 27, 2020, Governor Walz issued a stay-at-home order which was recently extended to May 4, 2020. This is in response to the number of confirmed cases of COVID-19 that continue to rise. This combination has strained staff and volunteer capacities for food systems to effectively respond to the growing emergency food demand. With this waiver, DHS wants to prevent unnecessary barriers to food access during this period of uncertainty.

The regulations listed below will allow SNAP Education staff to support filling the gap, by assisting emergency food partners while promoting and providing modified nutrition education and activities.

- 2 CFR §200.430 Compensation – Personal Services states that services rendered by an employee should be compensated during the period of performance under the federal award.
- 7 CFR §272.2 (d)(2)(vii)(B) SNAP-Ed services are “a combination of educational strategies, accompanied by supporting policy, systems, and environmental interventions, demonstrated to facilitate adoption of food and physical activity choices and other nutrition-related behaviors conducive to the health and well-being of SNAP participants and low income individuals eligible to receive benefits under SNAP or other means tested programs and individuals residing in communities with a significant low income population.”

We thank you for your consideration. If you have any questions regarding this request, please contact Carrie Lindquist at carrie.lindquist@state.mn.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tikki Brown', is placed over a light gray rectangular background.

Tikki Brown
Director Economic Opportunity and Nutrition Assistance

CC: Jenie Farinas, Program Specialist FNS SNAP-Midwest Region
Eric Meredith, Tribal Affairs Specialist, FNS Midwest Region
Carrie Lindquist, Grant Manager SNAP Education MNDHS
Sarah Aughenbaugh, Food and Nutrition Supervisor, MNDHS

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** Initial
3. **Regulatory citation:** 2 CFR §200.430; 7 CFR §272.2 (d)(2)(vii)(B)
4. **State:** Minnesota
5. **Region:** Midwest
6. **Regulatory requirements:**

2 CFR §200.430 Compensation – Personal Services states that services rendered by an employee should be compensated during the period of performance under the federal award. This regulation clarifies that professional activities needing special consideration need to be authorized by the federal awarding agency

7 CFR §272.2 (d)(2)(vii)(B) SNAP-Ed services are “a combination of educational strategies, accompanied by supporting policy, systems, and environmental interventions, demonstrated to facilitate adoption of food and physical activity choices and other nutrition-related behaviors conducive to the health and well-being of SNAP participants and low income individuals eligible to receive benefits under SNAP or other means tested programs and individuals residing in communities with a significant low income population.”

7. **Proposed alternative procedures:**

In these unprecedented times, it is imperative to ensure processes and procedures are collaborative in nature, flexible, and responsive while ensuring program guidance and any executive orders are being followed. The waiver will allow the Minnesota Department of Human Services (MN DHS) to grant temporary approval to SNAP Education (SNAP-Ed) Tribes and Implementing Agencies (IA's) to compensate salary, benefits, in-state travel, and reasonable and necessary supplies (not including food except for food demonstrations) to support food distribution and food service delivery alongside nutrition education, as well as provide community gardening support and promote physical activity with nutrition education.

Minnesota SNAP-Ed staff will assist emergency food network such as food banks, food shelves, etc. with coordinating, packaging, preparing, and delivering food to low-income households across Minnesota so they have access to food resources to be well and healthy during this pandemic. While working with emergency food network in this capacity, SNAP-Ed staff will continue to provide modified nutrition education, offer virtual learning opportunities, and other strategies to promote

physical activities. The opportunity to partner more closely with emergency food sites will set up relationships to educate the community and partners about the availability of SNAP-Ed programming in the future. Simultaneously, allowing SNAP-Ed staff to assist in meeting local food access needs and support food distribution in conjunction with nutrition education will bring necessary resources to communities and also help retain existing local SNAP-Ed staff, provide continuity of services and diminish longer-term training costs related to the need to hire new staff.

Local SNAP-Ed programs include policy, systems, and environmental change work related to gardens and food sovereignty offered in conjunction with garden-based direct education. Expanding the ability of SNAP-Ed staff to lead the creation of new gardens and/or maintain existing gardens will help ensure that there are gardens in place when SNAP-Ed programming can be reestablished when the pandemic restrictions are lifted. In addition, allowing SNAP-Ed funds to purchase garden supplies not currently allowable (e.g., seed starter kits) which are typically supplied by community partners will support the creation and maintenance of gardens.

All activities would be pre-approved by MN DHS to ensure it aligns with the waiver request.

8. Justification for request:

Governor Walz signed Executive Order 20-33 asking Minnesotans to stay at home, limiting non-essential activities to mitigate the spread of COVID-19. Recently, the Governor extended the stay at home order to May 4, 2020 and has also implemented the closure of schools until May 4, 2020. As a result of the mandate, it has debilitated the staff capacity of emergency food relief organizations and the volunteer volume has declined dramatically making it difficult for these partners to keep up with the demand needed to get food in the hands and onto the table of SNAP eligible households. These conditions provide an opportunity for SNAP-Ed staff to support the emergency food system by such activities as packing, distributing and/or delivering food for food banks and many other emergency food sites. This helps to directly improve the effectiveness of programs such as The Emergency Food Assistance Program, school nutrition programs, Elder Nutrition Program, and Food Distribution Program on Indian Reservations. Allowing this flexibility with SNAP Ed programming will help to address the increasing hunger and food need for low-income households as they struggle with food resources due to job loss and depleting financial resources. Without this flexibility, many families across Minnesota will face dire hardship if there is a lack of food resources an access primarily supplied by the emergency food network.

9. Caseload information, including percent of caseload and description of population expected to be affected by this waiver:

Caseload information is not directly applicable. Minnesota SNAP-Ed reached

over 230,000 people in Fiscal Year 2019 through direct education, policy, systems and environmental change as well as social marketing campaigns. This waiver will allow SNAP Ed programming to continue to service low-income participants in a unique capacity as we have seen an increase in SNAP enrollment and significant uptick in unemployment across Minnesota.

SNAP provides food benefits to approximately one out of every ten Minnesotans monthly (496,000 individuals) and this number is rapidly increasing due to the COVID-19 pandemic. Child poverty continues to plague the state. When breaking down poverty status by age, children 0-17 have the highest poverty rate across all age groups, with the highest poverty rate among children 0-4 (17.1%). In contrast to the states 11% poverty rate, over a third (36%) of single female headed households with children live in poverty.

10. Anticipated impact on households and State agency operations:

Fiscal Year 2019 SNAP-Ed programming in Minnesota included over 1,000 partners from such programs as: public health, education, agriculture, Tribal, food systems, community service, and food assistance. These existing relationships throughout the state position SNAP-Ed staff to further support low-income populations experiencing heightened vulnerability during the COVID-19 pandemic.

This waiver will allow SNAP-Ed staff to positively impact Minnesotans by helping address the fundamental human need of access to food. This is the most urgent demand and the way SNAP-Ed can best support vulnerable communities. Long-term, SNAP-Ed programs will benefit from deepened relationships and the trust building that will occur between staff and communities by being present and engaged during this time of crisis.

11. Anticipated implementation date and time period for which waiver is needed (please indicate if the waiver approval is needed to make system adjustments):

MN DHS will implement immediately upon approval through September 30, 2020 or until the pandemic or health crisis ends. Maintaining the waiver through September 30, 2020 would increase the outcome to increase food accessibility in combination with SNAP-Ed activities to reach those most in need.

12. Proposed quality control review procedures:

MN DHS conducts monitoring visits and will continue to use this process to ensure program compliance with state and federal regulations. SNAP-Ed Tribes and IA's will maintain mandatory time and effort, travel and other supporting documentation while also tracking all hours worked each day and allocate them according to SNAP-

Ed allowable activities and emergency food assistance support for documentation purposes. All expenses for compensation will be supported by records indicating total number of hours worked each day and kept on file. Actual travel costs and allowable program expense incurred will be reimbursed. All expenses for reimbursement will be reviewed and approved by MN DHS monthly. Grant managers from MN DHS will also institute regular check-ins with Tribes and IA's.

SNAP-Ed Tribes and IA's will to use their online data collection systems to collect, compile, and synthesize program outcomes for reporting. Furthermore, process evaluation methods are more important than ever to document SNAP-Ed program modifications, understand how these are being implemented at the local level, and highlight how SNAP-Ed is continuing to have a positive impact.

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

Name: Tikki Brown

Title: Director Economic Opportunity and Nutrition Assistance

Email: tikki.brown@state.mn.us

14. Date of request: April 7th, 2020

15. State agency staff contact:

Name: Carrie Lindquist

Title: Grant Manager

Email: carrie.lindquist@state.mn.us

16. Regional Office contact person (to be completed by FNS regional office): Jenie Farinas, jenie.farinas@usda.gov; 312-582-6767