



MICHAEL L. PARSON, GOVERNOR • JENNIFER TIDBALL, ACTING DIRECTOR

KIM R. EVANS, DIRECTOR
FAMILY SUPPORT DIVISION
P.O. BOX 2320 • JEFFERSON CITY, MO 65102-2320
WWW.DSS.MO.GOV • 573-751-3221 • 573-751-0507 FAX

April 9, 2020

Dana Platin, FNS
cc: Chad Imker, FNS
1244 Speer Blvd, Suite 903
Denver, CO 80204

Dear Ms. Platin,

Missouri is requesting to waive the following regulation in response to the COVID-19. The requests will prevent negative impact to SNAP households during the crisis period. These regulations are:

- Regulatory citations, 7 CFR 272.3 (c) (1) & 7 CFR 275.11(b) (1) (iii) to reduce the annual Positive SNAP QC review Sampling Plan

Missouri is requesting that these waivers stay in place through May 31, 2020 and will be reevaluated at that time.

Please see the attached waiver request. We greatly appreciate your consideration of this waiver request. If you have any questions please contact Jeremy Bowman at Jeremy.L.Bowman@dss.mo.gov.

Respectfully,

Kim Evans
Director

cc: Jeremy Bowman
cc: Gary Hinzpeter

AUXILIARY AIDS AND SERVICES ARE AVAILABLE UPON REQUEST TO INDIVIDUALS WITH DISABILITIES

TDD / TTY: 800-735-2966

RELAY MISSOURI: 711

STATE SNAP QCS WAIVER REQUEST

1. Waiver Serial Number (if applicable):

2. Type of request:

Initial

3. Regulatory citation:

7 CFR 272.3 (c) (1) (i) - Waivers

7 CFR 275.11(b) (1) (iii) Sample size, Active cases

4. State:

Missouri

5. Region:

Mountain Plains Region

6. Regulatory requirements:

Regulation at 7 CFR 272.3 (c) (1) , waivers that allows the Food and Nutrition Service to authorize waivers to deviate from specific regulatory provisions that can be approved for specific situations including, 7 CFR 272.3 (c) (1) (i) as the specific regulatory provision cannot be implemented due to extraordinary temporary situation.

Regulation at 7 CFR 275.11(b) (1) (iii) provides that each shall have a minimum number if active cases to be selected and reviewed by State agency during each annual review period.

7. Proposed alternative procedures:

Missouri is requesting a waiver to reduce our positive SNAP QC reviews for FFY2020 from 1,020 required cases for review to 765 required cases to review (no positive reviews for review months of March, April and May 2020).

8. Justification for request:

This request is pursuant to 7 CFR 272.3 (c) (1) , waivers that allows the Food and Nutrition Service to authorize waivers to deviate from specific regulatory provisions that can be approved for specific situations including, 7 CFR 272.3 (c) (1) (i) as the specific regulatory provision cannot be implemented due to extraordinary temporary situation. Missouri SNAP QCS in an extraordinary situation due to the COVID-19 Pandemic and because of waivers being approved for eligibility as a result of the Families First Coronavirus Response Act. The waivers that Missouri policy has received will allow Missouri Family Support Division (FSD) to ensure Missouri

SNAP participants may easily access SNAP benefits and improve social distancing between the agency and the customers we serve during this health crisis. Without implementation of this waiver request, SNAP QC customers would potentially have to leave their homes to participate fully in their review. Missouri foresees this being a temporary situation as current eligibility waivers are set to expire May 31, 2020.

On March 12, 2020 Missouri Governor, Michael Parsons, declared a state of emergency for the entire state. Additionally on Monday April 6, 2020 the governor issued a state wide Stay at Home Order as an attempt to reduce the spread of COVID-19 and protect the citizens of Missouri and Missouri government employees. Most of Missouri's SNAP QC team is working from home at this time, which creates additional challenges.

Missouri Department of Social Services wants to ensure the safety of our customers and our staff. With the reduction of 85 positive SNAP reviews a month which reduces the burdens of our customers to try and receive the required verification to cooperate with QC reviews. Missouri requests to reduce our annual positive sampling plan from 1020 cases to 765 cases, a reduction of our sampling plan by 25%.

To also ensure the safety of our customers and reduce the burden on them, Missouri DSS FSD has received and implemented the following:

Missouri has recently received the blanket waiver from FNS in response to the Families First Coronavirus Response Act that allows the state agency:

- To not require a household to complete an interview prior to approval, provided the applicant's identity has been verified and all other mandatory verifications have been completed.
- To not require a face-to-face interview or granting a request for a face-to-face interview to any household at application or recertification.

Missouri has also received the following from FNS in response to the COVID-19 pandemic:

- Missouri has implemented P-SNAP that allows the participant to receive the maximum allotment of SNAP benefits for March and April, 2020.
- Missouri is currently working with FNS to implement P-EBT that will allow additional SNAP benefits to households with school-aged children that are out of school due to the COVID-19 crisis.
- Missouri has also received a waiver that extends certifications for March, April and May by six months.

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

Missouri currently has about 312,125 active SNAP households which is about 663,517 individuals as of January 2020.

Missouri is currently receiving an average of 6,000 SNAP applications a day and we expect this to rise due to the number of individuals losing employment.

All SNAP applications are subject to the above waivers provided and to QC review.

10. Anticipated impact on households and State agency operations:

The waiver will reduce the burden on SNAP participants by not being required to cooperate with QC reviews. Customers will have barriers in gathering required verifications since employers, property management companies, medical providers, pharmacies and governmental agencies are closed or working on minimal staff levels. Most individuals are practicing social distancing and many counties have issued stay at home orders.

Missouri QC staff are also currently working from home during the stay at home orders that have been issued by local counties. Most Missouri residents are staying home based on guidance from state officials. This, in conjunction with the inability of our customers to obtain verifications will cause an increase in our incomplete rate which Missouri is actively working to improve as we are on a Corrective Action Plan for our incomplete rate.

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

Will be implemented upon waiver approval for the review period of March, April and May 2020. At the end of this time the waiver will be re-evaluated.

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

Name: Kim Evans

Title: Director

Email: Kim.R.Evans@dss.mo.gov

13. Date of request: 4/09/2020

14. State agency staff contact:

Name: Jeremy Bowman

Title: QA/QC Manager

Email: Jeremy.L.Bowman@dss.mo.gov

15. Regional Office contact person (*to be completed by FNS regional office*):