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April 3, 2020

Dana Platin
Regional Division Director
SNAP
1244 Speer Blvd #903
Denver, CO 80204

Dear Ms. Platin,

Missouri is requesting to waive the following regulation in response to COVID-19. This request will allow Missouri's SNAP-Ed personnel to support food assistance sites by packing, distributing, and/or delivering emergency food. The regulation is:

- 2 CFR §200.430 Compensation—personal services

Missouri is requesting that this waiver remain in place until the COVID-19 crisis is over, with review at 90 days.

If you have any questions, please contact Gwendolyn Beem at (573) 751-3381 or by email at Gwendolyn.J.Beem@dss.mo.gov.

Sincerely,

Kim R Evans
Director
KE/rw

cc: Melissa Wolf
Gwendolyn Beem

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

TDD / TTY: 800-735-2966

RELAY MISSOURI: 711

STATE WAIVER REQUEST

1. Waiver Serial Number (if applicable):

2. Type of request: Initial

3. Regulatory citation:

2 CFR §200.430

4. State: Missouri

5. Region: Mountain Plains

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, such as the allowability of compensation for activities outside of the federal award, need to be authorized by the federal awarding agency.

7. Proposed alternative procedures:

This waiver will allow the Missouri Department of Social Services (DSS), Family Support Division (FSD), to grant temporary approval to Missouri's SNAP-Ed sub-recipient (also known as SNAP-Ed Implementing Agency) and State Agency personnel to compensate salary, benefits, and in-state travel to support the emergency food system. FSD's role with regard to compensation is the approval and payment of SNAP-Ed expenditures to the sub recipient. The sub recipient's role is the issuance of payroll. The emergency food system includes food banks, food pantries, schools, and other food assistance sites who deliver emergency meals/food bundles.

FSD will continue to maintain mandatory time and effort and travel cost documentation. Agencies will track all hours worked each day and allocate them according to SNAP-Ed allowable activities and emergency food assistance support for documentation purposes as well as all associated costs will be charged to the SNAP-Ed federal award.

8. Justification for request:

Missouri is experiencing unique circumstances related to the onset of COVID-19. As of 4/2/20 1,834 Missouri citizens have tested positive for COVID-19. Missouri SNAP-Ed has had to cancel or postpone many direct education classes to be in compliance with stay-at-home mandates. Many communities are addressing food

insecurity during this crisis by providing free meals and food bundles. These community efforts provide an opportunity for SNAP-Ed staff to support the emergency food system by packing, distributing and/or deliver food to assist food banks and other emergency food sites.

During this time, SNAP-Ed staff are able to partner more closely with emergency food sites to educate the community about the availability of future SNAP-Ed programming.

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

10. Anticipated impact on households and State agency operations:

This waiver will allow SNAP-Ed personnel to assist their communities with food service and distribution. There is no impact expected for the State agency.

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

This waiver will be implemented upon approval. It will remain in effect for 90 days in an attempt to allow the COVID-19 health crisis to pass. Missouri will re-evaluate at 90 days to determine if an extension is needed. No system adjustments are required.

12. Proposed quality control review procedures: N/A

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

Name: Kim Evans

Title: Director

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

14. Date of request: 04/03/2020

15. State agency staff contact:

Name: Gwendolyn Beem

Title: SNAP Manager

Email: Gwendolyn.J.Beem@dss.mo.gov

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