



Department of Public Health and Human Services

Quality Assurance Division ♦ Program Compliance Bureau

2401 Colonial Drive, P.O. Box 202953 ♦ Helena, MT 59620-2953

Steve Bullock, Governor

Sheila Hogan, Director

April 29, 2020

Ms. Dana Platin
SNAP Director
Mountain Plains Regional Office
United States Department of Agriculture
Food and Nutrition Service
1244 Speer Blvd, Suite 903
Denver, CO 80204

Dear Ms. Platin:

Montana is requesting to waive the following regulation in response to the COVID-19 pandemic. The request will prevent impact to SNAP households during the crisis period:

- Regulatory citation **7CFR 271.11(b)(1)(iii)**. The request will reduce the minimum required Quality Control (QC) active sample size for FFY2020.

Montana is requesting the waiver to prevent a negative impact on SNAP households as well as mitigating administrative obstacles associated with complying with Montana's Executive Orders to stem the spread of COVID-19.

Montana is requesting the waiver to be effective for the Active Sample Months of April, May and June 2020.

If you have any questions, please feel free to contact me at 406-444-9356 or skranich@mt.gov.

Thank you for your support and consideration of this request.

Sincerely,

Steve Kranich
Montana SNAP QC Supervisor

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:

Montana

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:

Montana is requesting a waiver to reduce the Active SNAP QC reviews for FFY2020

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.

Montana SNAP QC is 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 Montana policy has received will allow

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

On March 15, 2020 the Governor of Montana, Steve Bullock declared a state of emergency due to COVID 19 pandemic. On March 15, 2020 the Governor also released Executive Orders 2-2020 and 3-2020 to protect the health and safety of Montana residents, slow the spread of COVID 19, reduce the number of people infected, and avoid strain on the health care system. All schools in Montana have been ordered closed through April 24, 2020. Resources such as access to childcare for working Montanans, including state staff, will be strained and in some cases unavailable.

Governor Bullock issued a state-wide Stay at Home Order (Executive Order 2-2020 and 3-2020) effective March 20th through at least April 24th unless performing an essential activity to reduce the spread of COVID-19 and protect the citizens of Montana and Montana government employees. Most of Montana's SNAP QC team are currently working remotely from their homes, which creates additional challenges.

Montana DPHHS wants to ensure the safety of our customers and our staff. The reduction in positive QC reviews will reduce the burdens of our customers to try and receive the required verification to cooperate with QC reviews. Montana requests to reduce the minimum annual active sampling plan from 826 cases to 620 cases, a reduction of 25 percent.

To also ensure the safety of customers and reduce the burden, Montana DPHHS has received and implemented the following policy waivers:

Montana has implemented 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.

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

- Montana has implemented P-SNAP that allows the participant to receive the maximum allotment of SNAP benefits for April and May 2020.
- Montana 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:

Montana currently serves 107,850 people and 52,996 households as of February 2020. Application volume has increased, and the total caseload will continue to rise as Montana citizens face unprecedented unemployment. All SNAP applications are subject to the above listed waivers and subject 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 face 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 Montana QC staff are also currently working from home as much as possible during the stay at home orders which may continue beyond the current deadline. Montana 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 the QC incompleteness 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):

Montana requests implementation effective May 1, 2020 for the Active Sample Months of April, May and June 2020.

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

Name: Steve Kranich

Title: QC Supervisor

Email: skranich@mt.gov

Date of request: April 20, 2020

13. State agency staff contact:

Name: Steve Kranich

Title: Quality Control Supervisor

Email: skranich@mt.gov

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