



Steve Bullock, Governor

Sheila Hogan, Director

March 20, 2020

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

Dear Ms. Platin,

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

- Regulatory citations, 7 CFR 273.10(f)(5) and CFR 273.12(a)(5). They extend certifications periods by 12 months.
- Regulatory citation, 7 CFR 273.2(e)(1). This would allow for the initial application interview to be waived.

Montana is requesting that these waivers remain in place until the COVID-19 crisis is over but would want to review at 90 days.

If you have any questions, please contact Christie Twardoski at (406)444-1917 or ctwardoski@mt.gov.

Sincerely,

Justine Welker
Interim SNAP Program Manager

Cc: Christie Twardoski

STATE WAIVER REQUEST

- 1. Waiver Serial Number (if applicable):**
- 2. Type of request:** Initial
- 3. Regulatory citation:** 7 CFR 273.10(f)(5); 7 CFR 273.12(a)(5)
- 4. State:** Montana
- 5. Region:** Mountain Plains Region
- 6. Regulatory requirements:**

Regulations at 7CFR 273.10(f) (5) provide that the State must certify eligible household for a definite period of time. Certification periods may not exceed 12 months. Elderly/Disabled households may be certified for up to 24-months.

Regulations at 7 CFR 273.12(a)(5) provide that a household is enrolled in simplified reporting and required to report any changes on their mid-certification forms.

- 7. Proposed alternative procedures:**

Montana is requesting a one-time occurrence to extend certification periods; 12 months will be added to all household. A 12-month extension will be added to the current 12 -month certifications to non-elderly and disabled SNAP households. A 12-month extension will be added to the current 24-month certifications for elderly and disabled households. The certification period will be extended beyond their currently scheduled expiration date by 12-months.

Montana is requesting this waiver statewide. This waiver will allow an alternative procedure of extending certifications without negative case actions. By extending the certification period, it ensures that SNAP households will receive their benefits timely. The waiver would be in place for all offices in Montana.

- 8. Justification for request:**

This request is justified pursuant to 7 CFR 272.3(c)(1)(ii) which permits FNS to authorize waivers that result in more effective and efficient administration of the program. The approval of this waiver extension would allow Human and Community Services (HCSD) part of the Department of Public Health and Human Services (DPHHS) to ensure households continue to receive their SNAP benefits during this health crisis.

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

As of February 2020, Montana currently serves 52,809 SNAP households or 105,578 individuals. All households are intended to be affected by this waiver.

10. Anticipated impact on households and State agency operations:

This waiver will prevent benefits from ending during the COVID 19 health 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):

Montana will increase the certification periods by 12 months for all cases expiring between the approval of this waiver and September 2020.

12. Proposed quality control review procedures:

No special QC procedures are required because of the provisions of this waiver.

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

Name: Christie Twardoski

Title: Policy/System Bureau Chief

Email: ctwardoski@mt.gov

14. Date of request: 03/20/2020

15. State agency staff contact:

Name: Justine Welker

Title: Interim SNAP/QA Program Manager

Email: jwelker@mt.gov

16. Regional Office contact person (to be completed by FNS regional office):
Philip Fraley, Philip.fraley@usda.gov, 303.844.0341