

State Waiver Request – Waive QC Sample Size and Completion Rate Requirements

1. **Type of Request:** Initial
2. **Regulatory citation(s):**
 - a. 7 CFR 275.11(b) Sampling - Sample size
 - b. 7 CFR 275.23(b)(2)(iii) Determination of State agency program performance – State agency error rates – Determination of payment error rates
3. **State:** Oklahoma
4. **Region:** Southwest (SWRO)
5. **Regulatory Requirements:**
 - a. 7 CFR 275.11(b) requires the State agency to select and review a minimum number of cases annually and address unanticipated changes, which could result in a need for an adjustment to the sample size.
 - b. 7 CFR 275.23(b)(2)(iii) requires the State agency to complete 98 percent of its required sample size or FNS shall adjust the State agency's regressed error rates.
6. **Description of proposed alternative procedures:**
 - a. Oklahoma proposes to waive minimum annual QC review requirements for fiscal year 2020 due to the unanticipated change of increased caseloads and increased number of QC review cases that will be incomplete or dropped as a result of COVID-19 crisis. No adjustments to be made to the current sample size or increase in reviews needing to be conducted at the end of the fiscal year. No penalties to be assessed if the actual caseload is more than 20 percent larger than the estimated caseload. Value of "n" will be based on the beginning of the year estimates.
 - b. Oklahoma proposes to waive QC completion rate requirements for fiscal year 2020 and any related regressions due to the added difficulty in completing QC reviews resulting from the COVID-19 crisis.
7. **Justification for Request:**

As of 04/21/2020, per <https://coronavirus.health.ok.gov/>, Oklahoma has **two thousand eight hundred and seven** (2807) persons testing positive for COVID-19 and **one hundred and sixty-four** (164) deaths. In addition, the State of Oklahoma has declared a state of disaster emergency on 03/15/2020 for all 77 counties.

The Center for Disease Control and Prevention "CDC" Coronavirus Disease 2019 (COVID-19), Prevention and Treatment (<https://www.cdc.gov/coronavirus/2019-ncov/summary.html>) continues to monitor this rapidly evolving situation and states the best way to prevent infection is to avoid being exposed to the virus that causes it.

Many offices across the state, including OKDHS, have had to make critical decisions to protect vulnerable populations they serve in the communities and minimize the health risks of the workforce, forcing them to restrict visits, operate by appointment only, or close to the public.

On March 25, the State Board of Education amended its first order to direct all accredited public schools to suspend all in-person and extracurricular activities and close buildings for the remainder of the school year, per

<https://sde.ok.gov/sites/default/files/documents/files/20200325124831229.pdf>.

The Governor has since issued an executive order closing all businesses not identified as being within a critical infrastructure sector, restricting restaurants in all 77 counties to provide take-out and delivery options only, postponing elective medical procedures, issued a statewide "Safer at Home" order for adults over the age of 65 and vulnerable individuals with serious underlying medical conditions, prohibiting visitation to nursing homes and long-term care facilities, and limiting social gathers, see <https://www.sos.ok.gov/documents/executive/1926.pdf>.

Due to the severity of the COVID-19 health crisis, Oklahoma has experienced an unexpected change, resulting in a significant increase in SNAP applications and caseloads. State quality control reviewers and sampled households have also been limited in their ability to complete QC review cases as necessary contacts and verification have been difficult or impossible to obtain due to closures, restrictions experienced across the state, and potential health risks from possible exposure to COVID-19.

8. **Anticipated impact on households and State agency operations:** Oklahoma does not anticipate that this waiver will have any negative impact on the clients or State agency operations.
9. **Caseload information, including percent, characteristics, and quality control error rate for affected portion:** For March 2020, 269,829 households received SNAP in Oklahoma. Since the QC selection process involves a random sample of all active and negative cases, all households have the potential to be affected by this waiver. For FFY 2019, Oklahoma had 1,102 Active cases selected with 148 error cases reported, with a total incorrect payment error rate of 7.93%.
10. **Anticipated implementation date and time period for which waiver is needed:** Oklahoma requests that the implementation of this waiver to be immediate upon FNS approval and apply to the entire fiscal year 2020.
11. **Proposed quality control review procedures:** Oklahoma quality control will continue to sample the required minimum sample size plus an over pull of 15% for positive and negative actions as detailed in the approved sampling plan. No adjustments or corrections will be made for over or under sampling due to changes in caseloads as a result of COVID-19. State quality control reviewers will continue to make every effort possible to complete case reviews.
12. **State agency submitting the waiver request and state contact person:** The state agency submitting this waiver request is the Oklahoma Department of Human Services. The state agency contact person is Sondra Shelby, Quality Management Administrator, Adult and Family Services (405-802-7277 / sondra.shelby@okdhs.org).
13. **Signature and title of requesting official:**



Patrick Klein, Adult and Family Services Director, Patrick.Klein@okdhs.org

14. **Date of State agency's request:** 04/27/2020

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