

## STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** Initial
3. **Regulatory citation:** §275.10
4. **State:** Oklahoma
5. **Region:** Southwest (SWRO)
6. **Regulatory requirements:** As part of the Performance Reporting System, each State agency is responsible for conducting quality control reviews. For SNAP quality control reviews, a sample of households shall be selected from two different categories: Households which are participating in SNAP (called active cases) and households for which participation was denied, suspended or terminated (called negative cases). Reviews shall be conducted on active cases to determine if households are eligible and receiving the correct allotment of SNAP benefits. The determination of whether the household received the correct allotment will be made by comparing the eligibility data gathered during the review against the amount authorized on the master issuance file. Reviews of negative cases shall be conducted to determine whether the State agency's decision to deny, suspend or terminate the household, as of the review date, was correct. Quality control reviews measure the validity of SNAP cases at a given time (the review date) by reviewing against SNAP standards established in the Food and Nutrition Act of 2008 and the Regulations, taking into account any FNS authorized waivers to deviate from specific regulatory provisions. FNS and the State agency shall analyze findings of the reviews to determine the incidence and dollar amounts of errors, which will determine the State agency's liability for payment errors in accordance with the Food and Nutrition Act of 2008, as amended, and to plan corrective action to reduce excessive levels of errors for any State agency.

The objectives of quality control reviews are to provide:

A systematic method of measuring the validity of the SNAP caseload; A basis for determining error rates; A timely continuous flow of information on which to base corrective action at all levels of administration; and A basis for establishing State agency liability for errors that exceed the National performance measure.

The review process is the activity necessary to complete reviews and document findings of all cases selected in the sample for quality control reviews.

The review process shall consist of:

Case assignment and completion monitoring; Case reviews; Supervisory review of completed worksheets and schedules; and Transmission of completed worksheets and schedules to the State agency for centralized data compilation and analysis.

7. **Proposed alternative procedures:** The State of Oklahoma is requesting a waiver to allow a 275-day hold harmless period for all waivers related to COVID-19.

8. **Justification for request:** Due to COVID-19, regulations have been lifted for SNAP. Many waivers have been requested and approved which may inhibit the ability to complete QC reviews and/or result in an unfair error rate if the current QC procedures in the FNS 310 Handbook must be followed.
9. **Caseload information, including percent of caseload and description of population expected to be affected by this waiver:** The current number of households receiving SNAP in Oklahoma as of March 18, 2020 is 270,268. 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 impact on households and State agency operations:** This waiver will provide consistency to each case selected for the QC review process.
11. **Anticipated implementation date and time period for which waiver is needed (please indicate if the waiver approval is needed to make system adjustments):** The State is requesting a 275-day hold harmless period beginning March 1, 2020 through November 30, 2020.
12. **Proposed quality control review procedures:** QC will exclude any variances that occur due to the implementation of any waivers related to COVID-19. Exclusions should apply until such time as the affected household is recertified or the state agency is otherwise required to act on a reported change. The variance exclusions will apply to all currently certified households, all households that are recertified, and households that are newly certified during the months of March, April and May 2020. The hold harmless period does not apply to future applicants who apply outside the 275-day exclusionary period.
13. **Name, title, and email of requesting official:** 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](mailto:sondra.shelby@okdhs.org)).
14. **Signature and title of requesting official:**



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Patrick Klein, Adult and Family Services Director, [Patrick.Klein@okdhs.org](mailto:Patrick.Klein@okdhs.org)

15. **Date of request:** 4-13-2020
16. **Regional Office contact person (to be completed by FNS regional office):**