



Food and Nutrition
Service

August 14, 2020

1320 Braddock
Place

Dan Haun
Director

Alexandria, VA

Office of Self-Sufficiency Programs
Oregon Department of Human Services

22314

500 Summer Street North East, E-48
Salem, Oregon 97310

RE: Supplemental Nutrition Assistance Program (SNAP) – Oregon Adjustment to
Suspend In-Person Submissions Due to Novel Coronavirus (COVID-19) –
Approval

Dear Mr. Haun:

This letter transmits the Food and Nutrition Service's (FNS) approval of the Oregon Department of Human Services (DHS) request (COV-184) to adjust SNAP regulations at 7 CFR 273.2(c)(1)(i) and 7 CFR 273.2(f)(5)(i), which allow households to submit applications or verification documents in-person at a local office.

Under this adjustment, the State agency may suspend in-person collection of applications and verification documents from households in order to minimize the risk of COVID-19 infection of both households and State agency staff, but will continue to allow households to submit applications or verification documents through all other available methods the State agency has made available, including, but not limited to: online portals and services, mobile applications, mail, telephone, or fax.

FNS approves this adjustment under authorization of the Families First Coronavirus Response Act (P.L. 116-127), for a period of 4 months, effective September 1, 2020 through December 31, 2020. FNS has determined this adjustment to be consistent with what is practicable under actual conditions in areas affected by the COVID-19 Public Health Emergency.

The approval is contingent upon the State agency's compliance with the conditions and data reporting components in items 9 and 10 of Enclosure 1 and are due 45 days after expiration (February 15, 2021). The detailed waiver response is enclosed.

In addition, the public health emergency declaration by the Secretary of Health and Human Services under section 319 of the Public Health Service Act and a state emergency order must be in place for this adjustment. The State agency will be able to maintain this adjustment through the expiration date of this approval or the end of the subsequent month following the expiration of the

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state emergency declaration if the State declaration expires before the end of the approval period (whichever comes sooner).

Please note that this approval may differ from the State's request. If you have questions or need additional information regarding this adjustment, please contact your respective Regional office representative.

Sincerely,

Sasha Gersten-Paal

Director

Program Development Division

Supplemental Nutrition Assistance Program

Enclosure

SUSPEND IN-PERSON SUBMISSIONS ADJUSTMENT RESPONSE

- 1. Waiver serial number:** COV-184
- 2. Type of request:** Initial
- 3. Regulatory citation:** 7 CFR 273.2(c)(1)(i), 7 CFR 273.2(f)(5)(i)
- 4. State:** Oregon
- 5. Region:** Western
- 6. Regulatory requirements:** Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.2(c)(1), households must file SNAP applications by submitting the forms to the SNAP office either in-person, through an authorized representative, by mail, by completing an on-line electronic application, or, if available, by fax, telephone, or other electronic transmission

Regulations at 7 CFR 273.2(f)(5)(i) require that households may supply documentary evidence in person, through the mail, by facsimile or other electronic device, or through an authorized representative.

7. Description of alternative procedures:

The State agency will continue to accept SNAP applications by other available methods, such as through an online electronic application, or by fax, telephone or other electronic transmission. Additionally, the State will continue to accept verifications by other available methods, such as mail, online submission through a self-service portal, secure email, and fax.

- 8. Action and reason for approval or denial:** FNS' approval of this adjustment is based on the determination that the adjustment is consistent with what is practicable under actual conditions in areas affected by the COVID-19 Public Health Emergency, as authorized by the Families First Coronavirus Response Act (P. L. 116-127). FNS is approving the State's request for a period of 4 months, effective September 1, 2020, through December 31, 2020.

- 9. Conditions and reasons:** Approval of this adjustment subject to the following conditions:

- The State agency must assist any household that faces difficulty in submitting documents through alternative methods.
- The State agency must ensure that sufficient administrative and automation controls are in place so the terms of this adjustment are implemented efficiently.
- The State agency must ensure that this adjustment does not negatively impact access to the program.

- The State agency must continue to uphold the following regulatory requirements under 7 CFR 273.2(c) and (f):
 - To provide a means for any applicant applying through any method to immediately begin the application process by filing an application with only a name, address and signature, per 7 CFR 273.2(c)(1)(iii);
 - To record the date of application as the date the application is received by the State agency, per 7 CFR 273.2(c)(1)(iv); and
 - To assist a household in obtaining verification, provide the household is cooperating with the State agency, per 7CFR 273.2(f)(5)(i).
- The public health emergency declaration by the Secretary of Health and Human Services under section 319 of the Public Health Service Act must be in place, and the State must have emergency order to operate under this adjustment. States will be able to maintain this adjustment through the expiration date of this approval or the end of the subsequent month following the expiration of the state emergency declaration if the State declaration expires before the end of the approval period (whichever comes sooner).

10. Evaluation Data Requirements: The State agency must provide to FNS the data and analysis listed below required for evaluation of this adjustment.

- The estimated number of households affected by this adjustment;
- A narrative on the effect of program access and client satisfaction, including an analysis of any client or advocate complaints received related to the adjustment procedure;
- A narrative on the effect of providing timely and accurate benefits; and
- A narrative on the effect of any other aspects of the eligibility process including the ability to manage staff caseload growth and the impact on administrative efficiency.

11. Expiration date: December 31, 2020 (subject to paragraph 9)

12. Quality control procedures: No special Quality Control (QC) procedures are required for cases subject to the provisions of this waiver. Cases should be reviewed using standard review procedures contained in the FNS Handbook 310.

13. Anticipated implementation date (*notify FNS if actual date differs*): September 1, 2020