



Food and  
Nutrition  
Service

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DATE: May 21, 2020

SUBJECT: Supplemental Nutrition Assistance Program (SNAP) – Questions and Answers on Quality Control (QC) Waiver of March, April and May 2020 case reviews

TO: All SNAP Regional Directors

The Food and Nutrition Service (FNS) is issuing the attached set of questions and answers to address inquiries received about the implementation of the April 30, 2020, waiver of March, April and May 2020 SNAP QC reviews.

FNS is grateful for your continued partnership in responding to the current public health emergency and ensuring SNAP households receive the nutrition assistance they need. The agency is ready to provide any additional technical assistance to State agencies as they seek to maintain operations and serve participants.

Sincerely,

Jessica Shahin  
Associate Administrator  
Supplemental Nutrition Assistance Program

## Enclosure

### Questions and Answers SNAP Waiver of March, April and May 2020 QC Reviews

**1. What is the decision date to accept the waiver?**

In response to State requests for flexibility, FNS is allowing States to accept at any time between April 30, 2020, the issuance date of the waiver and September 23, 2020, the date cases for the May 2020 sample month are due to FNS.

**2. If a state chooses to avail themselves of the waiver, will they simply not pull a sample, or will they pull a sample and code the cases as Not Subject to Review (NSTR)?**

States can choose to not pull a sample. If States have already pulled a sample they can delete the cases selected or can code the cases as NSTR following procedures in the FNS Handbook 310, Section 330.

**3. Can a State apply the waiver only for some months (for example, to just April and May or March and May).**

In response to State requests for more flexibility in which months they apply the QC review suspension waiver, FNS will allow States to choose to apply the waiver to all or some of the months included in the approval (March, April and/or May 2020).

**4. How should cases that have been completed be treated?**

For States that would like to take advantage of the QC suspension waiver but have already submitted some cases for the months that would be suspended, please contact your FNS Regional Office. FNS will work with you to process the change in the SNAP Quality Control System (SNAP-QCS).

**5. If the state takes the waiver, can they add additional months going forward?**

This waiver only applies to March, April and May 2020.

**6. Why did FNS pick these months?**

FNS received numerous requests from States for a range of months. Many States reported difficulties completing cases starting with the March sample month due to issues caused by the COVID-19 public health emergency. Based on these reports and requests, FNS determined that this constituted an extraordinary temporary situation, as outlined in 7 CFR 272.3(c)(1)(i), during which FNS may authorize temporary waivers to deviate from specific regulatory provisions.

**7. Can the state decide which 9 months they will conduct QC for?**

No. States may suspend QC reviews for March, April and/or May 2020.

**8. Would FNS consider extending deadlines for March, April, May cases for States who do not take the waiver?**

On March 19, 2020, FNS issued a waiver allowing all States an extra 45 days to submit the results of their December 2019, January 2020 and February 2020 QC reviews. FNS will review any State waiver requests for further extensions on a case by case basis.

**9. Will the increase in incomplete cases for States that do not take the waiver be taken into consideration since challenges from COVID -19 have impacted States' ability to complete cases?**

FNS currently has no plans to make any changes to the completion rate penalty.

**10. Regarding the blanket waiver evaluation data requirements, would it be acceptable to use the FNS 248 report with an added field for the average dollar amounts of benefits? In addition, should the supplements issued for COVID-19 be included in this dollar amount.**

Yes, States may use the FNS 248 report with the added field for average dollar amounts of benefits to supply the data needed for the evaluation data requirements in the waiver. However, States should not include any Pandemic-EBT or supplemental allotments provided under Section 1101 of the Families First Coronavirus Response Act (FFRCA) as those allotments are not subject to QC review following SNAP regulations at 7 CFR 275.11(f)(1)(ii) and 7 CFR 275.11(f)(2)(ii). Please refer to SNAP COVID 19 Q&A #3 for more background on the treatment of these FFRCA authorized allotments for QC purposes.