

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** Initial
3. **Regulatory citation:** §275.10 and §275.12
4. **State:** Alabama
5. **Region:** SERO
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.

§275.12 Review of active cases.

A sample of households which were certified prior to, or during, the sample month and issued SNAP benefits for the sample month shall be selected for quality control review. These active cases shall be reviewed to determine if the household is eligible and, if eligible, whether the household is receiving the correct allotment. The determination of a household's eligibility shall be based on an examination and verification of all elements of eligibility (i.e., basic program requirements, resources, income, and deductions). The elements of eligibility are specified in §273.1 and 273.3 through 273.9 of this chapter. The verified circumstances and the resulting benefit level determined by the quality control review shall be compared to the benefits authorized by the State agency as of the review date. When changes in household circumstances occur, the reviewer shall determine whether the changes were reported by the participant and handled by the agency in accordance with the rules set forth in §273.12, 273.13 and 273.21 of this chapter, as appropriate. For active cases, the review date shall always fall within the sample month, either the first day of a calendar or fiscal month or the day of certification, whichever is later. The review of active cases shall include: a household case record review; a field investigation, except as provided in paragraph (b) of this section; the identification of any variances; an error analysis; and the reporting of review findings.

7. **Proposed alternative procedures:** Due to the impacts from COVID-19 we are requesting to waive the review of all March, April, and May 2020 active cases from the Quality Control sample per 7 CFR 275.12. The State of Alabama is requesting a waiver to allow a 275-day hold harmless period for all cases; active, recertified and newly certified in the months of March, April, and May which were certified under any COVID-19 waiver. We propose that reviews should resume beginning with applications filed June 1, 2020 provided the COVID-19 Pandemic has ended.
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 Alabama as of March 31, 2020 is 335,919. A total of 233,448 households received Emergency Supplemental benefits which represents 69% of the total households. The number of applications filed has significantly

increased since March 16, 2020. The number of applications registered in March was 71,398, an increase of 17,682 households from February 29, 2020. The number of applications processed was 43,156, an increase of 3,753 or 10% increase. The number of applications pending at the end of March was 28,242, an increase of 13,929 or 9%. Not considered in this number is the large number of Internet applications that have not been registered. Alabama is utilizing state office personnel as well as division staff to accomplish registration. 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.

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 anticipates implementing the waiver upon approval for March, April and May 2020 Review months. We are requesting a 275-day hold harmless period beginning March 1, 2020 through November 30, 2020. An extension may be requested if the virus has not been contained.

There is no system change required.

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. 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:**

Name: Brandon Hardin

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14. **Date of request: 4-9-2020**
15. **State agency staff contact:**

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