



Eric Holcomb, Governor
State of Indiana

Division of Family Resources
402 W. WASHINGTON STREET, ROOM W392
INDIANAPOLIS, IN 46204-2747

April 8, 2020

Julie Mikkelson, Director
Supplemental Nutrition Assistance Program
USDS, Food and Nutrition Service
77 West Jackson Blvd 20th Floor
Chicago, IL 60604-3507

Dear Ms. Mikkelson:

Attached please find a new waiver request in response to the March 13, 2020, national declaration of emergency due to the coronavirus (COVID-19) pandemic as well as the public health emergency declared in Indiana on March 6, 2020.

Indiana is requesting a waiver to suspend the use of IEVS in order to allow us to continue to focus on the increased volume of new applications being received.

If you have any questions or comments, please contact David Smalley at David.Smalley@fssa.in.gov or (317) 232-2010.

Thank you for your consideration of this request.

Sincerely,

Adrienne Shields, Director
FSSA/Division of Family Resources



STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** New
3. **Statutory citation:** Families First Coronavirus Response Act
4. **Regulatory citation:** 7 CFR 273.2 (f)(9)
5. **State:** Indiana
6. **Region:** MWRO
7. **Regulatory requirements:**

§7 CFR 273.2 (f) (9) Mandatory use of IEVS. States must obtain information through IEVS.

 - (i) The State agency must obtain information through IEVS in accordance with procedures specified in §272.8 of this chapter and use it to verify the eligibility and benefit levels of applicants and participating households.
 - (ii) The State agency must access data through the IEVS in accordance with the disclosure safeguards and data exchange agreements required by part 272.
 - (iii) The State agency shall take action, including proper notices to households, to terminate, deny, or reduce benefits based on information obtain through the IEVS which is considered verified upon receipt. This information is social security and SSI benefit information obtained from SSA, and TANF benefit information and UIB information obtained from the agencies administering those programs. If the State agency has information that the IEVS-obtained information about a particular household is questionable, this information shall be considered unverified upon receipt and the State agency shall take action as specified in paragraph (f)(9)(iv) of this section.
 - (iv) Except as noted in this paragraph, prior to taking action to terminate, deny, or reduce benefits based on information obtained through the IEVS which is considered unverified upon receipt, State agencies shall independently verify the information. Such unverified information is unearned income information from IRS, wage information from SSA and SWICAs, and questionable IEVS information discussed in paragraph (f)(9)(iii) of this section. Independent verification shall include verification of the amount of the asset or income involved, whether the household actually has or had access to such asset or income such that it would be countable income or resources for SNAP purposes, and the period during which such access occurred. Except with respect to unearned income information from IRS, if a State agency has information which indicates that independent verification is not needed, such verification is not required.
 - (v) The State agency shall obtain independent verification of unverified information obtained from IEVS by means of contacting the household and/or the appropriate income, resource or benefit source. If the State agency chooses to contact the household, it must do so in writing, informing the household of the information which it has received, and requesting that the household respond within 10 days. If the household fails to respond in a

timely manner, the State agency shall send it a notice of adverse action as specified in §273.13. The State agency may contact the appropriate source by the means best suited to the situation. When the household or appropriate source provides the independent verification, the State agency shall properly notify the household of the action it intends to take and provide the household with an opportunity to request a fair hearing prior to any adverse action.

8. Description of alternative procedures:

On January 31, 2020, the International Health Regulations Emergency Committee of the World Health Organization declared the outbreak of COVID-19 a public health emergency of international concern as well as Health and Human Services Secretary, Alex M. Azar II, declared a public health emergency for the United States. The Governor of Indiana, Eric Holcomb, declared a state of emergency of the entire state of Indiana on March 6, 2020, (Executive Order 20-02) to protect the well-being of the citizens of Indiana from the dangerous effects of COVID-19. In addition to the state-declared state of emergency, on March 13, 2020, President Trump declared a national state of emergency over the COVID-19 pandemic.

Approval of this waiver will assist DFR county offices to focus only on new SNAP applications as they continue to be received. Further, while the number of applications increases, the current workforce level to process the work, already strained, is at risk of becoming unsteady. Minimizing the number of cases that have to be “worked” in order for individuals to maintain SNAP benefits is crucial.

After initial approval of SNAP benefits, Indiana would like to suspend the use of the Income Eligibility Verifications System, which will generate thousands of “hits” for jobs that may have been lost after Governor Holcomb ordered bars, restaurants and other non-essential establishments to close on March 16, 2020. Staff time is better spent getting benefits out quickly to meet the increased demand for benefits during this crisis.

9. Justification for request:


This request is justified pursuant to the Families First Coronavirus Response Act and 7 CFR 272.3(c) (1)(ii) which permits FNS to authorize waivers that result in a more effective and efficient administration of the program. The approval of this waiver would allow Indiana to ensure that we can respond quickly to the increase in demand for SNAP benefits as a result of this health crisis.

10. Anticipated impact on households and State agency operations:

This waiver will allow new applications for SNAP benefits to be approved quickly. Focusing new applications will help ensure benefits flow quickly to households with swift approval processes.

11. Caseload information:

This waiver will apply to all SNAP applicant and recipient households. Indiana’s federal fiscal year (FFY) 2018 quality control error rate was 7.18%. The number of SNAP recipients as of January 2020 was 561,268.

- 12. Anticipated implementation date and time period for which waiver is needed:**
Immediately upon approval for the period of time during which Indiana is under a state of emergency due to COVID-19.
- 13. Proposed quality control review procedures:**
Indiana requests hold-harmless provisions for all waivers approved by USDA.
- 14. State agency submitting waiver request and State contact person:**
Indiana: David Smalley, 317-232-2010, david.smalley@fssa.in.gov
- 15. Signature and title of requesting official:**
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Adrienne Shields
Director, FSSA/Division of Family Resources
Email: adrienne.shields@fssa.in.gov
- 16. Date of request:**
April 8, 2020
- 17. State agency staff contact (name/email/telephone):**
David Smalley, 317-232-2010, david.smalley@fssa.in.gov
- 18. Regional office contact person (to be completed by FNS regional office):** Jenie Farinas,
Jenie.Farinas@fns.usda.gov