

March 23, 2020

Ms. Dana Platin
SNAP Director
Mountain Plains Regional Office
United States Department of Agriculture
Food and Nutrition Service
1244 Speer Blvd. Suite 903
Denver, CO 80204

Dear Ms. Platin:

Kansas is requesting to waive the following regulation in response to the COVID-19 for the months of April, May and June 2020. The request will prevent negative impact to Food Assistance households during the crisis period. The regulation is:

- Regulatory citation, 7 CFR 273.13. This request will put on hold all Adverse Actions (AA) on cases during the COVID-19 crisis period. These cases will be re-evaluated at 90 days.

We are requesting this waiver to ensure that individuals and families that are affected by the COVID-19 pandemic are able to maintain or obtain Food Assistance benefits without burden. We believe this waiver will also prepare for administrative barriers during this time as DCF continues to lose staff daily due to illness or caring for a family member. We would like to implement this waiver as soon as possible.

If you have any questions, please contact Janelle Harper at 785-296-5416 or at Janelle.harper@ks.gov.

We thank you in advance for your support of this waiver request.

Sincerely,



Laura Howard, Secretary

STATE WAIVER REQUEST

1. Waiver Serial Number (if applicable):

2. Type of request:

Initial

3. Regulatory citation:

7 CFR 273.13

4. State:

Kansas

5. Region:

Mountain Plains Region

6. Regulatory requirements:

Regulation at 7 CFR 273.13 provide that states must complete an adverse action to terminate a Food Assistance case when they are found to no longer be eligible.

7. Proposed alternative procedures:

A waiver be granted to waive all adverse actions notification for 90 days for all active cases during April, May and June 2020 due to the COVID-19 pandemic. This waiver will be set to expire June 30, 2020 but will also be re-evaluated at that time to see if an extension is necessary. Kansas is requesting this waiver statewide to put a hold on all adverse actions during the health crisis. Any changes that are reported during the 90 days will be held until next Interim Report or Review. At this time, DCF Service Centers are closed to the public. This waiver will decrease the burden on recipients and staff during the health crisis. DCF expects an increase in work on behalf of closed or understaffed offices throughout the state due to the COVID-19 pandemic. DCF staff who are properly equipped have been authorized to work remotely. The offices that have staff will continue their own work but will also be asked to complete additional work for other offices leading to potentially significant increases in workload.

8. Justification for request:

This request is justified pursuant to 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 the waiver would allow participants to remain active so that households can continue to receive SNAP benefits during this health crisis.

On March 12, 2020 the Governor of Kansas declared a state of emergency due to COVID 19 pandemic. Additionally, on March 17, 2020 the Governor released Executive Order 20-04 to protect the health and safety of Kansas residents, slow the spread of COVID 19, reduce the number of people infected, and avoid strain on the health care system. All schools in Kansas have been ordered closed through the remainder of the current school year. Resources such as access to childcare for working Kansans, including state staff, will be strained and in some cases unavailable.

9. Caseload information, including percent of caseload and description of population expected to be affected by this waiver:

Kansas currently serves 189,760 people and 90,647 households as of February 2020. Of these numbers 88,108 were children. This waiver would impact 100% of the caseload. The waiver will be applied statewide.

10. Anticipated impact on households and State agency operations:

The waiver will allow participants to continue receiving Food Assistance benefits during this time of health crisis. Reporting, processing and verification requirements will be followed after the 90 days or the end of the health crisis.

11. Anticipated implementation date and time period for which waiver is needed (please indicate if the waiver approval is needed to make system adjustments):

Will be implemented upon waiver approval for the period of 90 days with an anticipated expiration date of June 30, 2020. The waiver will be re-evaluated at that time and an extension will be requested if necessary.

12. Proposed quality control review procedures:

No special QC procedures are required for cases subject to the provisions of the waiver.

13. Name, title, and email of requesting official:

Name: Laura Howard

Title: Secretary, Kansas Department for Children and Families

Email: Laura.Howard@ks.gov

14. Date of request: March 18, 2020

15. State agency staff contact:

Name: Janelle Harper

Title: Food Assistance Program Manager

Email: janelle.harper@ks.gov

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

Philip Fraley at Philip.Fraley@usda.gov