Collections and Repayment Waiver Request

- 1. **Type of request:** Initial request to waive Collections and Repayment due to COVID-19.
- 2. **Primary regulation citation(s):** 7 CFR 273.18(e)(1), 7 CFR 273.18(e)(5)
- 3. State: Massachusetts
- 4. **Region:** Northeast Region
- 5. **Regulatory requirements:** 7 CFR 273.18(e)(1) states that state agencies must begin collection action on all claims unless they are not cost-effective. 7 CFR 273.18(e)(5) requires that claims become delinquent if not paid by the due date and satisfactory payment arrangement has not been made.
- 6. **Proposed procedures:** MA is requesting to suspend all collection of active recoupment of SNAP overpayments and delay the collection actions on a new recoupments for a period of 120 days during this time of uncertainty. Households will still be liable for their outstanding debts; however, they will not be required to repay during this temporary waiver period and will not be considered delinquent for lack of payment by payment due dates already established via the repayment agreement. Households with newly identified overpayments will also be liable, but their collection will be postponed until after the 90-day waiver period.
- 7. **Justification for request**: Due to the rapid spread of COVID-19, the President of the United States has declared a national emergency and the Governor of Massachusetts has declared a state of emergency. Massachusetts wants to ensure that individuals and families that are affected by COVID-19, through transmission, lifestyle impacts or loss of employment, are able to maintain their SNAP benefits without undue burden. MA wants to ensure as few barriers as possible to food access during this period. By suspending collection activities for a 120-day period, MA will ensure households have access to their full SNAP benefit during a period of economic uncertainty and particular need for food access. By suspending household claims collections for 90 days, households subject to recoveries will have adequate funds to purchase food items and prepare for these unanticipated circumstances.
- 8. Anticipated impact on households and State Agency operations: Households currently active on SNAP will temporarily receive their full benefit amount instead of a reduced SNAP benefit due to overpayment recoupment. Non-SNAP households that owe money will not be penalized or considered delinquent for missed payments. The State Agency will work with out internal Information Technology (IT) support team to implement a plan, which will suspend all overpayments collections for a period of 120 days.

- 9. Caseload information, including percent of caseload and description of population expected to be affected by this waiver: MA is actively recouping or collecting payment from approximately 8,500 SNAP households as of March 14,2020.
- 10. **Time Period for which Waiver is needed:** This waiver is requesting to be implemented upon approval from FNS. It will be valid for up to 120 days from the date of approval.
- 11. Signature and Title of Requesting Official:

Brittany Mangini

Director of Food Security and Nutrition Programs

Department of Transitional Assistance

12. **Date of Request:** March 31, 2020