

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** New
3. **Regulatory citation:** 7 CFR 273.29(a)(2), 7 CFR 273.2 (e), 7 CFR 273.2 (e)(2)(i), 7 CFR 273.14(b)(3), and 7 CFR 273.2(i)(3)(iii)
4. **Secondary regulation citation, if any:**
5. **State:** Michigan
6. **Region:** Midwest Region
7. **Regulatory requirements:** Supplemental Nutrition Assistance Program (SNAP) regulations at 7 C.F.R. 273.2(a)(2) requires that the application process include an interview.

Regulations at 7 C.F.R. 273.2(e) requires that the State agency interview households for eligibility before certifying.

Regulations at 7 CFR 273.2(e)(2)(i) requires that the State agency must inform each applicant of the opportunity for a face-to-face interview at the time of application and recertification and grant a face-to-face interview to any household that requests one at any time, even if the State agency has elected the option to routinely provide telephone interviews.

Regulations at 7 C.F.R. 273.14(b)(3) requires that State agencies interview households as part of the recertification process

Regulations at 7 C.F.R. 273.2(i)(3)(iii) require the State agency to conduct the interview (unless the household cannot be reached) and complete the application process within the expedited service standards.

8. **Proposed alternative procedures:** For SNAP applications received or households due for recertification in July 2020 through December 2020, the State will not be required to interview a household at initial application or recertification, provided that the applicant's identity has been verified and all other mandatory verifications in 7 C.F.R. 273.2(f)(1) have been completed. The State will be required to contact the household if any information on the application is questionable and cannot be verified. The State will make every attempt to verify household circumstances through data matching and mailing or uploading verifications to the State system.

Additionally, the State will not inform households of the right to complete the interview face-to-face for initial applications and recertifications. The State will continue to conduct any needed interviews by telephone.

- 9. Justification for request:** 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. Michigan's Governor, Gretchen Whitmer, declared a state of emergency (Executive Order 2020-4) for the state of Michigan on March 10, 2020 to protect Michigan citizens from the risks of COVID-19. On March 13, 2020, the President of the United States declared a national state of emergency over the COVID-19 pandemic.

Approval and implementation of this waiver will assist Michigan in processing cases and ensuring timely benefit issuance continues once the current waivers expire on June 30, 2020. Michigan will continue to be impacted by COVID-19 beyond the current waiver expiration date, which is the reason for requesting this additional waiver for July through December 2020. The extension of recertification dates currently expires in June. With this expiration, Michigan's local offices will start to see a dramatic increase in the amount of case work required for ongoing cases.

Suspending the interview requirement for applications will allow county agencies to continue to adjust to the increase in work under the new restricted working conditions. Michigan has seen a significant increase of SNAP applications and approvals over the past four months. Suspension of the interview requirement will provide local offices with additional time to focus on the accuracy of case processing, ensure that SNAP applicants are approved as soon and as accurately as possible.

Suspending the interview requirement for SNAP recertifications will assist our local offices in maintaining ongoing workloads and support timeliness. Since recertifications from March through June were extended to September through December, offices are now seeing twice the amount of recertifications for those months, in addition to an increase of new applications.

Without this waiver, Michigan is at risk of being unable to provide and maintain benefits timely due to the ongoing impacts of COVID-19. Furthermore, this waiver will assist in protecting the safety and health of Michiganders while supporting our social distancing requirements, ordered by our governor. If any interview is needed for clarification of unclear information, it can be completed over the phone, with no unnecessary risk to our employees or the families that we serve.

- 10. Anticipated impact on households and State agency operations:** This waiver will allow interviews for SNAP application and recertifications to be waived for July 2020 through December 2020, provided that the applicant's identity has been verified and all other mandatory verifications in 7 C.F.R. 273.2(f)(1) have been completed. Approval of this waiver will assist in protecting the lives, safety, and health of the citizens of Michigan due to allowing our local offices to focus valuable resources on approving and maintaining client benefits. It will also limit personal contact by conducting telephone interviews when needed to help prevent the spread and effects of the virus.

- 11. Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable):** This waiver will apply to all SNAP applicants and recipient households. Michigan's federal fiscal year (FFY) 2018 quality control error rate was 11.53%. The number of Michigan's SNAP recipients as of May 2020 was 1,528,379.
- 12. Anticipated implementation date and time period for which waiver is needed:** This waiver applies to SNAP applications received and recertifications due in July 2020 through December 2020.
- 13. Proposed quality control review procedures:** Cases will be reviewed in accordance with this waiver approval.
- 14. State agency submitting waiver request and State contact person:** Michigan Department of Health and Human Services, Dawn M. Sweeney
- 15. Signature and title of requesting official:**
Dawn M. Sweeney

Dawn M. Sweeney
Michigan SNAP Administrator
- 16. Date of request:** 6/30/2020
- 17. State agency staff contact (name/email/telephone):** Dawn Sweeney, sweeneyd1@michigan.gov, (517) 243-5560
- 18. Regional office contact person:**