

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** Initial
3. **Regulatory citation:** 273.10(f)(3); 273.12(a)(5); 273.14; 275.12(d)(2)(vii)
4. **State:** Michigan
5. **Region:** MWRO
6. **Regulatory requirements:** The State agency must certify each eligible household for a definite period of time. State agencies must assign the longest certification period possible based on the predictability of the household's circumstances. The first month of the certification period will be the first month for which the household is eligible to participate. The certification period cannot exceed 12 months except to accommodate a household's transitional benefit period.

SNAP simplified reporting households certified for four months or more are subject to periodic reporting requirements. Elderly blind or disabled households with no earned income are exempt from the periodic report requirements.

SNAP quality control reviews are a subsample of the SNAP caseload. All elements are subject to review.

7. **Description of alternative procedures:** Michigan will complete all standard, automatic data matching for income as well as other purposes normally completed at recertification. The following data matches will be conducted:
 - Work Number to verify reported income
 - MI Unemployment Insurance Agency (UIA) for wages and Unemployment Benefits (UB)
 - Social Security Administration (SSA) interfaces to determine a change in SSA benefits, earned income, pensions, incarceration, death, and SS numbers (BENDEX, SSI/SDX, BEERS, PVS, Death Master File)
 - State and PARIS interface for benefit receipt in other States.

For 50% of all scheduled redeterminations (minus the disabled/senior groups), MDHHS will request no other verifications from the household unless information reported by the household on the redetermination application is questionable.

MDHHS will review initial and recertification applications and conduct streamlined interviews under the following circumstances:

- Information reported on the recertification is unclear, incomplete, or inconsistent
- A data match from a third-party data source conflicts with information reported by the household.

- 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 efficient and effective administration of the program. The approval of this waiver would allow for the administrative flexibility needed for Michigan to protect the public health and the health of our staff and members, while ensuring households continue to receive their FAP benefits during this health crisis. It would also allow the department to address the backlog of redeterminations based on Covid waivers approved earlier in the year, will ensuring continuation of benefits. This waiver would also allow us to align with our health care, childcare, and TANF programs to ensure continuity of services across programs.

Approval of this waiver will assist to continued reduce the spread of the Coronavirus disease (COVID-19) and avoid putting customer's health at risk by eliminating the need for customers to complete FAP redetermination interviews. Containing and reducing the transmission of COVID-19 is a priority of the United States and Michigan.

MDHHS anticipates a 44% increase in the number of redeterminations in the month of October, as compared to October 2019; a 35% increase in the month of November, as compared to November 2019; and 54% increase in the month of December, as compared to December 2019. In addition, MDHHS is facing a significant budget shortfall for FY 21 and starting in October 2020 and we anticipate staff furloughs throughout the entire department, and this will impact the 3,000 eligibility specialists in the field.

9. Anticipated impact on households and State agency operations:

MDHHS anticipates this adjustment will make the recertification process more efficient for households to submit a redetermination by reducing the verification burden while still ensuring households are certified for appropriate benefit levels. MDHHS anticipates this adjustment will allow the eligibility specialists to process more redeterminations actions in October- December. In addition, the adjustments help balance program access and integrity by ensuring income and other eligibility factors are verified prior to recertifying households.

- 10. Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable):** Current FAP caseload is 741,309 households statewide.

- 11. Anticipated implementation date and time period for which waiver is needed:** October 2020-December 2020.

- 12. Proposed quality control review procedures:** Quality Control (QC) will not be impacted.

13. State agency submitting waiver request and State contact person:
Dawn M. Sweeney sweeneyd1@michigan.gov

14. Signature and title of requesting official:

Dawn M. Sweeney

Name: Dawn M. Sweeney

Title: SNAP State Administrator, Economic Stability
Administration, MI Department of Health and Human Services
Sweeneyd1@michigan.gov

15. Date of request: 08/10/2020

16. State agency staff contact (name/email/telephone): Dawn M.
Sweeney 517-243-5560 Sweeneyd1@michigan.gov

17. Regional office contact person (to be completed by FNS regional office):

SNAP COVID Adjustment Request and Transition Plan Summary- MICHIGAN

(The document should be no more than one page and is meant to be a high level summary for reference).

In order to receive approval, a State must demonstrate that the adjustments continue to be warranted given the current circumstances in the State and provide data to support extension.

State Agency and Region:

Michigan Department of Health and Human Services (MDHHS)

MWRO

What Adjustment(s) is the State Requesting *(e.g. core verification and interview adjustment)*

- Waive the interview at recertification for certain elderly/disabled members
- Core Verification and Interview Adjustment

Demonstrated Need for Extension of the Adjustment *(This should be based on operational data provided by the State, not a narrative. Data to support requests would be expected to include data on including lessened workforce capacity, increased recertifications, and/or increased case actions, among other supporting information.)*

	Redetermination Due date	FY 20 Redets	FY 2019 Redets	Percentage Increase
	9/30/2020	63,268	30,226	52%
	10/31/2020	69,130	39,060	44%
	11/30/2020	69,159	45,628	35%
	12/31/2020	81,671	38,084	54%

How Does the State Plan to Transition to the New Normal *(The State should provide the region with a detailed plan that shows how and when the State will return to its “new normal” -- that is a steady operation that may in fact entail higher caseloads than experienced pre-Covid -- including a phased in approach.*

MDHHS will decrease waivers redeterminations five percent above the standard level for each month. September will be at 50% of non-elderly/disabled redeterminations, October will be at 55% of non-elderly/disabled redeterminations, November will be at 60% and December will be at 60%.