



Minnesota Department of Human Services
Economic Assistance and Employment Support Division
444 Lafayette Road North
St. Paul, MN 55155

June 18, 2020

Julie Mikkelson, Director
Supplemental Nutrition Assistance Program
United States Department of Agriculture
Food and Nutrition Service
77 West Jackson Street, 20th Floor
Chicago, IL 60604-3591

Dear Ms. Mikkelson,

Attached is a waiver EXTENSION request in response to the March 13, 2020 national emergency declaration due to COVID-10, and subsequent Executive Order 20-75 extending Minnesota's peacetime emergency to July 13, 2020.

This waiver will avoid the need for county and tribal eligibility staff to manually send out renewal forms. This is because our eligibility system sends out forms at the same time for all cash, food, and healthcare programs. We can't separate the processing jobs. DHS must send out all of the forms, or none of the forms.

We recognize that applications are trending downward, and this isn't our primary concern. It's the manual labor that would be required of county and tribal staff who are still working from home. It's simply not feasible.

Minnesota is requesting an extension of the waiver to extend re-certifications and adjust periodic reporting requirements for July, 2020:

- Allow certification periods to be extended by six months renewals that become due for July, 2020.
- Suspend six month reporting requirements for July, 2020.

Link to Extension of MN's peacetime emergency order: https://mn.gov/governor/assets/EO%202020-75%20Extension%20of%20PTE_tcm1055-435771.pdf

Link to what's open and capacity limits: <https://staysafe.mn.gov/>

If you have questions, please contact me at 651-431-3942.

Sincerely,

(signed) Kathy Bruen

Kathy Bruen, Manager, Supplemental Nutrition Assistance Program
Minnesota Department of Human Services

Enclosures

CC: Melissa Cundari, Branch Chief, Program Integrity, FNS Midwest Region (via email)

Erica Kain, Branch Chief, Policy, FNS Midwest Region (via email)

Tikki Brown, Director, Office of Economic Opportunity and Nutrition Assistance (via email)

WAIVER REQUEST

1. **Waiver** serial number
2. **Type of request:** EXTENSION
3. **Primary regulation citation:**

§7 CFR 273.10(f)(5), §7 CFR

273.12(a)(5)(iii)

4. **State:**

Minnesota

5. **Region:**

Midwest

6. **Regulatory requirements:**

Supplemental Nutrition Assistance Program (SNAP) regulations at §7 CFR 273.10(f)(3)(i) require a minimum certification period of 6 months for most households. Regulations at §7 CFR 273.10(f)(5) allow states to extend certification periods up to 12 months or 24 months for those households that are all elderly or disabled. Regulations at §7 CFR 273.12(a)(5)(iii) require an interim periodic report in the sixth month for households assigned to simplified reporting (SR), if the certification period exceeds 6 months.

SNAP regulations at §7 CFR 273.12 contains a variety of reporting requirements.

SNAP regulations at §7 CFR 273.14 state that no household may participate beyond the expiration of the certification period assigned in accordance with §7 CFR 273.10(f) without a determination of eligibility for a new period. The State agency must establish procedures for notifying households of expiration dates, providing application forms, scheduling interviews, and recertifying eligible households prior to the expiration of certification periods. Households must apply for recertification and comply with interview and verification requirements.

7. **Proposed alternative procedures:**

The State agency will adjust the expiration for certification periods by six months effective for renewals due in July, 2020, and suspend 6-month reporting requirements for July, 2020.

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 Minnesota to protect the public health and the health of our staff and members, while ensuring households continue to receive their SNAP benefits during this health crisis.

In addition, sending renewal forms for July would require county and tribal eligibility workers to manually send out the forms. This is because our eligibility system sends all of the forms together and programming ties the forms together, we cannot separate them without a system modification. The timeline for a system modification is approximately 12 months. Governor Tim Walz developed executive orders allowing cash programs to extend dates, and healthcare is also extending for July.

Processing forms manually is not feasible given that many workers continue to work from home, and staffing is barely adequate to meet the non-COVID demand. Human Service office's remain closed to the public, or open on a limited basis. Required SNAP timelines will not be met if all required forms were mailed, completed and returned for processing.

9. Anticipated Impact on households and State agency operations:

Approval of this waiver will assist to 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 SNAP redetermination applications, six month report forms, office visits, and scheduling interviews during waiver timeframe. Containing and reducing the transmission of COVID-19 is a priority of the United States and Minnesota. See # 8 above.

10. Caseload information, Including percent, characteristics, and quality control error rate for affected portion:

Minnesota currently serves 435,176 SNAP household members and 205,920 households (cases) as of April 1, 2020.

11. Anticipated implementation date and time period for which waiver is needed:

July, 2020.

12. Proposed quality control review procedures:

Quality Control (QC) reviews will be conducted using policies and procedures in effect at the time the case is sampled for review.

13. State agency submitting waiver request and State contact person:

Kathy Bruen kathy.bruen@state.mn.us

14. Signature and title of requesting official:

A handwritten signature in black ink, appearing to read 'Tikki Brown', is written over a light gray rectangular background.

Tikki Brown, Director
Economic Opportunity and Nutrition Assistance