



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

March 22, 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 request in response to the March 13, 2020 national emergency declaration due to the coronavirus (COVID-19) pandemic as well as Governor Walz's Executive Order 20-01 declaring a peacetime emergency in Minnesota, signed March 13, 2020.

This waiver when implemented will allow county and tribal eligibility staff to process SNAP benefit requests more quickly. While the number of applications increases it will be increasingly difficult to keep up with the demand for benefits under the current procedures, in particular if staff are unable to work due to illness. Minnesota has already seen on-line requests for assistance increase in the last week.

Minnesota is requesting a waiver to follow alternate procedures during this state of emergency:

- Allow verbal signatures for some applications.
- Allow applicant self-attestation when verifications can't be obtained quickly, or at all.
- Suspend the use of IEVS during the pandemic

Status of virus in Minnesota:

<https://www.health.state.mn.us/diseases/coronavirus/situation.html>

We welcome your feedback on the successful use of the waiver and look forward to providing any further information you may need.

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

Sincerely,

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)

Samantha Byrd, Supervisor, SNAP Quality Control (via email)

Laura Ellis, Supervisor, SNAP-Management Evaluation, DHS (via email)

Karen Nelsen-Huss, SNAP Policy, DHS (via email)

Pam Majkozak, SNAP Policy, DHS (via email)

Lori Bona, SNAP Payment Accuracy Coordinator (via email)

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** Initial due to COVID-19 emergency
3. **Statutory citation:** Families First Coronavirus Response Act
4. **Regulatory citation:** §7 CFR 273.2 (c)(7); §7 CFR 273.2 (f)(1); §7 CFR 273.2 (h)(i); §7 CFR 273.2 (f)(4), §7 CFR 273.2 (c)(7)
5. **State:** Minnesota
6. **Region:** MWRO
7. **Regulatory requirements:**
 - §7 CFR 273.2 (c)(7)(i) Requirement for a signature. A form must be signed to establish a filing date and to determine the State agency's deadline for acting on the form. The State agency shall not certify a household without a signed form. 273.2 (iii) through (ix) (B) describes the various signing options – written, unwritten, electronic, telephonic (recorded), and gestured.
 - §7 CFR 273.2 (f) Verification. Verification is the use of documentation or a contact with a third party to confirm the accuracy of statements or information. State agencies must give households at least 10 days to provide required verification.
 - §7 CFR 273.2 (f)(1) Mandatory verification. States must verify gross non-exempt income, alien eligibility, utility expenses in order to claim as a deduction, medical expenses in order to claim as a deduction, social security numbers, residency (in the state), identity, disability (to apply other regulations), factors affecting household composition, if questionable), student factors affecting eligibility, actual child support payments to allow as a deduction, hours worked for ABAWDs subject to time limit and months in another state, (time limit waived under H.R. 6201);
 - §7 CFR 273.2 (f)(4) Sources of verifications. State agencies shall use documentary evidence as the primary source of verification for all items except residency and household size.
 - §7 CFR 273.2 (f) (9) Mandatory use of IEVS. State's must obtain information through IEVS.
8. **Description of alternative procedures:**

On 3/21/20, Minnesota requested a waiver to extend recertification dates by 6 months and suspend reporting requirements for other households during the pandemic. This allows MN eligibility staff to focus on new applications.

For new applications. Individuals who request assistance over the phone will have their applications completed, and interview held by the eligibility worker at the time

of the call. The application date will be the date the phone interview takes place, which will be the same day the application is completed by eligibility staff. Many households do not have access to the internet, and as human service offices continue to close, households need easy access to benefits. MN still expects to receive applications via drop-box, mail, fax and electronically via ApplyMN. There will be no change to benefit start date when applications are received under normal processes. However, if a signature is missing on either the first page (sets date of eligibility) or last page (attesting to accuracy of application) eligibility staff will allow a verbal signature, note on the application and enter a case note in MAXIS, Minnesota's eligibility system.

MN will use client statements as primary source of verification for applicants whose employment has been impacted by the COVID-19 virus. Governor Walz signed Executive Order #20-04 to order the temporary closure of MN restaurants, and bars. On March 18, he signed Executive Order #20-08 clarifying the other types of businesses subject to closure, including salons and establishments that provide the following services: haircuts & styling, tanning, body art, tattoos, piercing, nails, cosmetology, estheticians, and eyelash salons. Applicants who indicate they work in the industries identified in the executive order, or indicate they lost their job, or hours were reduced due to COVID-19, will be able to self-attest to their employment, income status and other eligibility factors. Eligibility staff will take a verbal statement, and document the statement in case notes, on the application form, or possibly a template

Verification of identity, social security numbers, alien status and income from the Social Security Administration (SSI, RSDI for example) will continue to be verified per current MN policy. For example, SSN's, SSI and RSDI income can be verified using MN's State data exchange with the Social Security Administration. Alien status can be verified using the SAVE system.

After initial approval of SNAP benefits, MN would like to suspend the use of the Income Eligibility Verifications System, which will generate thousands of "hits" for jobs that may have been lost after Governor Walz ordered bars, restaurants and other non-essential establishments to close on March 16, 2020. Staff time is better spent getting benefits out quickly to meet the increased demand for benefits during this crisis.

For new applications, recertifications will be set at 12 months which is current MN policy.

Link to executive orders:

<https://mn.gov/governor/news/?id=1055-365086#/list/appId/1/filterType//filterValue//page/1/sort//order/>

9. Justification for request:

This request is justified pursuant to the Families First Coronavirus Response Act and 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 this waiver extension would allow MNDHS to ensure Minnesota can respond quickly to the increase in demand for SNAP benefits as a result of this health crisis.

10. Anticipated impact on households and State agency operations:

This waiver will allow new applications for SNAP benefits to be approved quickly. The Minnesota Department of Employment and Economic Development (DEED) has received over 95,000 applications for unemployment insurance in the last roughly 7 days. MN expects many of the same households may apply for SNAP. Focusing on new applications will help ensure benefits flow quickly to households with swift approval processes.

11. Caseload information:

Minnesota currently serves 370,313 SNAP household members and 193,005 households (cases) as of February 1, 2020.

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

Immediately until the COVID-19 health crisis has passed.

13. Proposed quality control review procedures:

MN requests hold-harmless provisions for all waivers approved by USDA.

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

Minnesota: Kathy Bruen

15. Signature and title of requesting official:

Tikki Brown

e-signed: 

Title: Director, Economic Opportunity & Employment Supports

Email for transmission of response: tikki.brown@state.mn.us and kathy.bruen@state.mn.us

16. Date of request:

3/22/2020

17. State agency staff contact (name/email/telephone):

SNAP Manager: Kathy Bruen kathy.bruen@state.mn.us 651-431-3942

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

Olivarez, Sulema.Olivarez@usda.gov