



Food and Nutrition
Service

May 11, 2020

1320 Braddock Place
Alexandria, VA
22314

Tikki Brown
Director
Economic Assistance and Employment Supports Division
Minnesota Department of Human Services
444 Lafayette Road North
St. Paul, Minnesota 55105

RE: Supplemental Nutrition Assistance Program (SNAP) – Minnesota Adjustment
Request for Telephonic Designation of Authorized Representative Due to
Novel Coronavirus (COVID-19) – Approval

Dear Ms. Brown:

This letter transmits the approval of the Minnesota Department of Human Services (DHS) request to adjust SNAP regulations at 7 CFR 273.2(n)(1)(i), which allow authorized representatives to complete application procedures on behalf of the household, provided the authorized representative is an adult sufficiently aware of relevant household circumstances and the household designates the individual as the authorized representative in writing.

Under this adjustment (COV-082), the State can allow community partners and advocates to serve as authorized representatives in order to complete applications over the phone for clients who need assistance. The community partner or advocate may obtain a verbal attestation from the household over the phone, giving the community partner approval to serve as the authorized representative for the purpose of signing the application. The community partner or advocate would then be able to sign the application as the client's authorized representative and submit the application to the State.

The Food and Nutrition Service (FNS) is approving this adjustment under authorization of the Families First Coronavirus Response Act (P.L. 116-127) for a period of 3 months, effective March 1, 2020 through May 31, 2020. FNS has determined this adjustment to be consistent with what is practicable under actual conditions in areas affected by the COVID-19 Public Health Emergency.

The approval is contingent upon the State agency's compliance with the conditions and data reporting components in item 11 of Enclosure 1 and are due 45 days after expiration (July 15, 2020). The detailed waiver response is enclosed.

FNS is responding rapidly to the COVID19 pandemic with multiple waivers and flexibilities in its programs. The Families First Coronavirus Response Act requires the Food and Nutrition Service to collect specific data elements from States. The CARES Act provides funding, for which FNS will collect information in order to distribute funding. Please prepare the necessary data elements to collect and submit this data as described in this document. The public will be given the opportunity to comment on this data collection, including legislatively-mandated data collection through a future information collection process being submitted to the Office of Management and Budget.

Please note that this approval may differ from the State's request. If you have questions or need additional information regarding this adjustment, please contact your respective Regional office representative.

Sincerely,

Sasha Gersten-Paal
Director
Program Development Division
Supplemental Nutrition Assistance Program

Enclosure

Enclosure 1

RECORDING OF TELEPHONIC SIGNATURES ADJUSTMENT RESPONSE

- 1. Waiver serial number:** COV-082
- 2. Type of request:** Initial
- 3. Regulatory citation:** 7 CFR 273.2(n)(1)(i)
- 4. State:** MN
- 5. Region:** MWRO
- 6. Regulatory requirements:** Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.2(n)(1)(i) allow for a nonhousehold member to be designated as an authorized representative for the application process provided that the person is an adult who is sufficiently aware of relevant household circumstances and the authorized representative designation has been made in writing by a responsible member of the household.
- 7. Description of alternative procedures:** The State will allow community partners or advocates to serve as authorized representatives in order to sign applications for households over the phone. This adjustment will apply to the community partners or advocates listed below:
 - American Indian OIC
 - Arrowhead Economic Opportunity Agency
 - Bi-County Community Action Programs, Inc.
 - Catholic Charities of St. Paul and Minneapolis
 - Catholic Charities of the Diocese of St. Cloud
 - Community Action Center of Northfield
 - Community Action Duluth
 - Community Action Partnership of Ramsey and Washington Counties
 - Comunidades Latinas Unidas En Servicio
 - Hmong American Partnership
 - Hunger Solutions Minnesota
 - Inter-County Community Council, Inc.
 - Lakes and Pines Community Action Council, Inc.
 - Lakes and Prairies Community Action Partnership, Inc.
 - Lutheran Social Service of Minnesota
 - MAHUBE-OTWA Community Action Partnership, Inc.
 - Minnesota Valley Action Council

- Neighborhood House
- NorthPoint Health & Wellness Center, Inc.
- Northwest Community Action, Inc.
- Northwest Indian Community Development Center
- Prairie Five Community Action Council, Incorporated
- Sabathani Community Center
- Scott Carver Dakota CAP Agency, Inc.
- SEWA-AIFW, Inc.
- Second Harvest Heartland
- Semcac
- Three Rivers Community Action, Inc.
- Tri-County Community Action Partnership
- Tri-County Action Program, Inc.
- Tri-Valley Opportunity Council, Inc.
- United Community Action Partnership, Inc.

Should the State wish to include additional community partners or advocates, it must submit such a request in writing to FNS for approval. Community partners and advocates may continue to provide application assistance in accordance with 7 CFR 272.4(a)(2).

The community partners or advocates may obtain a verbal attestation from the client over the phone, giving the community partner approval to serve as the authorized representative for the purpose of completing the application. Community partners and advocates who accept verbal attestations must document the date and time of the client's attestation in writing and transmit the documentation to the State to include in the case file. The community partner or advocate would then be able to sign the application as the client's authorized representative and submit the application to the State.

- 8. Action and reason for approval or denial:** The Food and Nutrition Service (FNS) recognizes the need for adjustments due to the COVID-19 Public Health Emergency. As authorized by the Families First Coronavirus Response Act (P.L. 116-127), FNS' approval of this adjustment is based on the determination that the adjustment is consistent with what is practicable under actual conditions in areas affected by the COVID-19 Public Health Emergency. FNS is approving the State's request for a period of 3 months, effective March 1, 2020, through May 31, 2020.
- 9. Conditions and reasons:** FNS is approving this adjustment subject to the following conditions:
 - The State will continue to verify the identity of both the applicant and the authorized representative, in accordance with 7 CFR 273.2(f)(1)(vii);

- Community partners or advocates designated as authorized representatives under this adjustment will be considered authorized representatives only for the purpose of signing the application, not for completing other parts of the obtaining benefits;
- Community partners and advocates who accept verbal attestations must document in writing the date and time of the client's verbal attestation of the authorized representative designation and transmit the documentation to the State to include in the case file; and
- The State agency has the capacity to provide to FNS the data required for evaluation of the caseload.

10. Evaluation Data Requirements

The State agency must provide to FNS the data and analysis listed below required for evaluation of this adjustment.

- Estimated number of households affected by this adjustment;
- A narrative on the effect of program access and client satisfaction, including an analysis of any client or advocate complaints received related to the adjustment procedure;
- A narrative on the effect of providing timely and accurate benefits; and
- A narrative on the effect of any other aspects of the eligibility process including the ability to manage staff caseload growth and the impact on administrative efficiency.

11. Expiration date: May 31, 2020

12. Quality control procedures: No special Quality Control (QC) procedures are required for cases subject to the provisions of this waiver. Cases should be reviewed using standard review procedures contained in the FNS Handbook 310.

13. Anticipated implementation date (*notify FNS if actual date differs*):
Upon receipt of approval.