

WAIVER REQUEST

1. **Waiver** serial number
2. **Type of request:** EXTENSION for September, 2020.

3. **Primary regulation citation:**

§7CFR273.10(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 September, 2020 and suspend 6-month reporting requirements for September 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.

Extending this waiver through September is critical for families, children and individuals to retain access to ensure low income households remain eligible for this critical nutritional benefit.

- Minnesota's Stay Safe Plan (Phase 3 of 4) encourages Minnesotans to stay close to home but allows outdoor gathering of friends and family of 25 people or less, and indoor gathering of 10 people or less. Gatherings should adhere to proper social distancing, like staying six feet apart and wearing a mask. This directly impacts human service operations. Our metro counties can have anywhere from 5 (small offices) to 100+ (in urban centers) people in their lobbies depending on the time of the month. That is not a safe environment to contain COVID-19. Counties have reported that gearing up for re-opening safely requires thoughtful planning, funds for PPE, and ensuring masks are available for walk-in customers, and actually used by them.
Link to Stay Safe Plan: <https://mn.gov/covid19/for-minnesotans/stay-safe-mn/stay-safe-plan.jsp>
- Masks are now required according to [Executive Order 20-81](#).
- Governor Walz continues to urge those who can work from home to do so. The majority of state staff continue to work from home until further notice to slow/prevent the spread of COVID-19. The majority of county and tribal governments are following suit.
- All counties and tribes agree a transition period is needed to return to normal processing schedules, as does Governor Walz and the Minnesota legislature. On June 23, 2020 Governor Walz signed MN House File 105 **allowing a 60-day transition period to rescind waivers implemented for Minnesota's TANF program and five state cash programs by executive order**, and return to non-COVID policy and procedures including phone assistance and verbal signatures to complete applications. MN's emergency declaration was extended to August 12, 2020. **We understand that States must have an emergency declaration in place. Therefore, we need a response as soon as possible for planning purposes.** For years, we have consistently heard from our constituents, counties, tribes and other human service partners that our programs are too complicated and not easily accessible. Allowing application assistance and relief from reporting during COVID-19 crisis is one very important way we can align in the short term to make access easier during a time when's benefits and services are critical to ensure people and kids stay in their homes and have healthy food to eat.
- Counties and tribes in MN are in varying states of accessibility to the public – from closures to limited services. Hennepin, MN's largest county with multiple offices, continues to administer public assistance programs remotely with staff working from home. Ramsey, MN's second largest county, is using a hybrid model of remote and limited in-person services. Dakota, Olmsted, Otter Tail, Sherburne and others are administering public assistance programs by phone, e-mail, text, drop boxes, postal service and on-line.

Based on survey responses asking counties and tribes if they are open or closed to the public, the majority remain closed or have very limited in-person access.

- 96% of the 92 county and tribal supervisors surveyed responded.

- All were either closed to the public, or had very limited in-person contact.
- New applications appear to be trending downward, however there are 8,331 requests for cash and food assistance pending an average of 16 days. Fifty-seven percent of those are for SNAP, and the balance for other cash programs. This signals the continued need for financial and food support for families and individuals.

Our data indicates that 60% of cases closed in April and 64% closed in May contained Federal Pandemic Unemployment Compensation (FPUC) benefits which are scheduled to end on July 31, 2020, potentially increasing applications for SNAP.

Since March 16, 2020 882,772 people applied for unemployment insurance benefits – that’s 12.9% of Minnesota’s population. 105,075 of those were in June, 2020 (11.9% of the total claims) compared to 12,005 in claims in June, 2019. The chart on this page identifies the industries hardest hit. The first and second occupations, food and beverage serving workers, along with retail sales workers are the hardest hit and also the slowest to fully reopen. <https://mn.gov/deed/data/current-econ-highlights/ui-statistics.jsp>

Racial Disparities in Minnesota

- We know there is a disproportionate impact that COVID-19 is having on people of color and indigenous populations who are also disproportionately represented in SNAP and cash programs. We must provide relief for this population to help mitigate their risks of contracting COVID-19.
- From Minnesota Department of Health Website Introduction: COVID-19 is exposing what has always been true: racism is pervasive and persistent. This virus is exacerbating Minnesota’s racial disparities on many fronts. The data presented on this page include; Black Minnesotans are testing positive for COVID-19 at nearly 7 times higher than white Minnesotans; of all Indigenous individual who test positive for COVID, 29% are hospitalized, the highest rate of any of the race groups with data collected; People of Color and Indigenous Minnesotans are disproportionately represented in the state’s homeless population. We are very worried that many will not even receive the forms in the mail. For complete analysis of the impact of COVID-19 by race and ethnicity see: <https://mn.gov/covid19/data/data-by-race-ethnicity/index.jsp>
- See also Minnesota’s COVID-19 dashboard for updated statistics: www.mn.gov/covid19/data/covid-dashboard/index.jsp

9. Anticipated Impact on households and State agency operations:

Since the majority of county and tribal human service agencies remain closed to the public, this waiver helps ensure unnecessary movement around the state to help reduce the spread of the Coronavirus disease (COVID-19) and avoid putting customer's health at risk by eliminating the need to complete SNAP redetermination applications, six month report forms, office visits, and scheduling interviews during the waiver timeframe. Containing and reducing the transmission of COVID-19 is a priority of the United States and Minnesota. Minnesota DHS, counties and tribes are planning for a return to normal operations in the fall. See # 8 above.

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

Minnesota provided 426,026 people in 213,628 households (cases) with SNAP benefits as of June 1, 2020. Minnesota's estimated population is 5.68 million, that's roughly 7.6% of Minnesotans utilizing SNAP. It's important to remember that SNAP benefits supplement a household diet. It does not supply 100% of food needs. SNAP represents just under ½ of the 1.3 million people relying on our help in Minnesota – cash/food and healthcare programs. Minnesota's error rate through half of June is 6.58% overpayment and 2.16% underpayment = 8.74% error rate.

Link to most recent available

Minnesota characteristics report: <https://edocs.dhs.state.mn.us/lfserver/Public/DHS-5182M-ENG>

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

September 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:



Tikki Brown, Director
Economic Opportunity and Nutrition Assistance

