

## STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** Initial
3. **Regulatory citation:** 7 CFR 273.14(b)(3), 7 C.F.R. 273.2(f)(1), 7 C.F.R. 273.2(e)(2)(i)
4. **State:** Missouri
5. **Region:** Mountain Plains Region (MPR)
6. **Regulatory requirements:** Federal regulations at 7 CFR 273.14(b)(3) require State agencies to conduct a face-to-face interview as part of the recertification process. The Federal regulation at 7 CFR 273.2(e)(2)(i) also permits State Agencies to waive the face-to-face interview in favor of a telephone interview for all households.

SNAP regulations at 7 C.F.R. 273.2(a)(2), 273.2(e)(2)(i), and 273.14(b)(3) do not require a household to complete an interview prior to approval, provided the applicant's identity has been verified and all other mandatory verifications in 7 C.F.R. 273.2(f)(1) have been completed.

Federal regulation, 7 C.F.R. 273.2(e)(2)(i), requires State agencies to inform each applicant of the opportunity for a face-to-face interview at the time of application and recertification and grant a face-to-face interview to any household that requests one at any time, even if the State agency has elected the option to routinely provide telephone interviews at recertification.

7. **Description of alternative procedures:** Missouri Family Support Division (FSD) is requesting a waiver of the above regulations. This waiver will allow Missouri to recertify a SNAP household whose certification period ends the month of July, without requiring the household complete an interview prior to approval, provided the applicant's identity has been verified and all other mandatory verifications in Federal regulations 7 C.F.R. 273.2(f)(1) have been completed. Interviews will be completed for all initial and expedited applicants during July 2020 and ongoing, complying with regulatory requirements.

Missouri is requesting to waive all face-to-face interviews, even when requested by the applicant, according to SNAP regulation 7 C.F.R. 273.2(e)(2)(i) by not offering a face-to-face interview or granting a request for a face-to-face interview to any household at initial application or recertification. Missouri currently has the option to provide telephone interviews and waive the face-to-face interview, except when one is requested.

8. **Proposed alternative procedures:** FSD is requesting this waiver to improve effectiveness and efficiency while transitioning from the Corona Virus Disease 2019 (COVID-19 or CV19) crisis back to Standard Operating Procedures (SOP). These options will be effective July 1, 2020 with re-evaluation at 30 days.
9. **Justification for request:** During the CV19 crisis FSD received a waiver option waiving all interviews, including expedited and initial, by not requiring a household to complete an interview, provided the applicant's identity and all other mandatory verifications in 7 C.F.R. 273.2(f)(1) have been completed. Missouri also received a blanket waiver to extend certification periods by six months for March 2020 through June 2020, during CV19 crisis.

Therefore, Missouri will experience a substantial increase in the number of recertification applications during September 2020 through December 2020, due to extension of certification periods during CV19. This waiver allows Missouri to transition into regulatory requirements while allowing participants and FSD staff a period of transition for scheduling of appointments, receipt of notices and re-entry of offices. FSD field offices remain closed to the public. FSD staff are still acclimating to telework and safety standard procedures including social distancing and Person Protective Equipment (PPE) in order to re-open field offices for re-entry by staff and the public.

10. **Caseload information, including percent of caseload and description of population expected to be affected by this waiver:** Missouri has seen an increase in the Statewide caseload of 311,401 cases prior to CV19, to a current statewide caseload of 360,937, as of April 2020. Due to the increase of the statewide caseload in conjunction with a high volume of recertification applications that Missouri will see for the months of September (12,589), October (12,104), November (14,721) and December (15,899) 2020, Missouri anticipates these factors in combination with CV19 safety standards could have a negative impact on the ability to process work in a timely manner with the influx of additional work and offices remaining closed.
11. **Anticipated impact on households and State agency operations:** This waiver will have a positive effect on recipients and staff in Missouri. Requiring interviews for re-certifications at this time will create barriers for recipients as Missouri's field offices remain closed to the public and will continue to be closed into July 2020. Missouri's staff is adapting to telework processes and building better technology to support remote access to recipients. Missouri has implemented the use of Chatbot to better communicate remotely with our recipients, with an 80% accuracy resolution rate.
12. **Anticipated implementation date and time period for which waiver is needed (please indicate if the waiver approval is needed to make system adjustments):** The implementation date is anticipated to begin July 1, 2020 with re-evaluation at 30 days. No system changes are expected.
13. **Proposed quality control review procedures:** N/A
14. **Name, title, and email of requesting official:**  
  
**Name:** Kim R. Evans  
**Title:** Director  
**Email:** Kim.R.Evans@dss.mo.gov
15. **Date of request:** June 8, 2020
16. **State agency staff contact:**  
  
**Name:** Gwendolyn Beem  
**Title:** Food Stamp (also known as SNAP), Manager  
**Email:** Gwendolyn.J.Beem@dss.mo.gov
17. **Regional Office contact person (to be completed by FNS regional office):**