



Food and Nutrition
Service

March 23, 2020

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Alexandria, VA
22314

Justine Welker
Interim SNAP Program Manager
Department of Public Health and Human Services
Department of Children and Families
P. O. Box 4210
Helena, Montana 59620

RE: SNAP – Montana Request to Extend Certification Periods and Adjust
Reporting Requirements Due to COVID-19 – Approval

Dear Ms. Hatch:

This letter transmits approval of the Montana Department of Public Health and Human Services (PHHS) adjustment request (Adjustment # COV-028) to extend certification periods and adjust periodic reporting requirements for ongoing Supplemental Nutrition Assistance Program (SNAP) households statewide. FNS is approving this request under authorization of the Families First Coronavirus Response Act (P.L. 116-127).

The Food and Nutrition Service (FNS) approves the State agency's request to adjust the certification provisions of section 3(f) of the Food and Nutrition Act of 2008 (the Act) and SNAP regulations at 7 CFR 273.10(f)(5). The State agency may extend certification periods for households scheduled to expire in March, April and May 2020, for 6 months until September, October and November 2020. This adjustment includes households with earned income that by regulation cannot normally be certified for more than a six month period.

FNS also grants the State agency's request to adjust the periodic reporting requirements of section 6(c)(1)(D)(i) of the Act, and SNAP regulations at 7 CFR 273.10(f)(1) and 7 CFR 273.12(a)(5)(iii)(B) for ongoing households in the approved areas.

If you have questions or need additional information regarding this adjustment, please contact your respective Regional office representative.

Sincerely,

Sasha Gersten-Paal
Program Development Division
Supplemental Nutrition Assistance Program

Enclosure

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**EXTEND CERTIFICATION PERIODS AND ADJUST REPORTING
REQUIREMENTS ADJUSTMENT RESPONSE**

1. **Adjustment serial number:** COV-028
2. **Type of request:** Initial
3. **Regulatory citation:** 7 CFR 273.10(f)(5)
4. **State:** Montana
5. **Region:** Mountain Plains
6. **Regulatory requirements:** Supplemental Nutrition Assistance (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 273.14 state that no household may participate beyond the expiration of the certification period assigned in accordance with § 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. **Description of alternative procedures:** The State agency will adjust the expiration for certification periods expiring in March, April and May 2020 and will extend the certification period of these households for 6 months until September, October and November 2020. The state will also adjust the periodic reporting requirement for households with a period report due between March through May 2020 and for households whose certification period is extended under this waiver.
8. **Action and reason for approval or denial:** The Food and Nutrition Service (FNS) recognizes the need for State agency measures for effective

and efficient program management. FNS is approving this request for 3 months, effective March 1, 2020.

9. Legislative basis for action: Approval is based on the Families First Coronavirus Response Act (P.L. 116-127).

10. Conditions and reasons: Approval is contingent upon the following conditions:

- The State must notify households impacted by this approval and continue to comply with the notice requirements at 7 CFR 273.10(f)(5).
- SNAP Quality Control will review against the terms of this adjustment and in accordance with FNS Handbook 310.
- The State agency will submit a request to FNS for approval if it wishes to extend this adjustment beyond the initial period.

11. Evaluation Data Requirements: The State agency must provide to FNS the data and analysis listed below required for evaluation of this waiver.

- 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 waived 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.

12. Expiration date: May 31, 2020.

13. Limitation, if any, on approval: Approval of this adjustment is limited to the State SNAP agency.

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

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