



Department of Public Health and Human Services

Director's Office ♦ PO Box 4210 ♦ Helena, MT 59620 ♦ [REDACTED] www.dphhs.mt.gov

Steve Bullock, Governor

Sheila Hogan, Director

September 2, 2020

Dana Platin, SNAP Division Director
USDA Food and Nutrition Service
Mountain Plains Region
1244 Speer Blvd #903
Denver, CO 80204

SUBJECT: Montana request for Periodic Report Flexibility for Non-Extended Recertification Cases

Dear Ms. Platin,

The State of Montana Department of Public Health and Human Services (DPHHS) is working to respond swiftly and effectively to the COVID-19 emergency. As statewide orders continue, DPHHS is requesting adjustments of certain SNAP regulations from the USDA Food and Nutrition Services to ensure that Montana residents continue to receive SNAP benefits.

Please find attached our adjustment request in response to the COVID-19 pandemic as it relates to the flexibility for Periodic Reporting for Non-Extended Recertification Cases. We appreciate FNS' consideration of this request and as well as a prompt response so that we may begin making necessary changes to our system, business process and operating procedures. If you have any questions about the is request please don't hesitate to reach out to me at [REDACTED].

Sincerely,

Stephanie Jenewein

Stephanie Jenewein
SNAP Program Manager
Montana Department of Public Health & Human Services

SNAP COVID Adjustment Request and Transition Plan Summary

(The document should be no more than one page and is meant to be a high-level summary for reference).

In order to receive approval, a State must demonstrate that the adjustments continue to be warranted given the current circumstances in the State and provide data to support extension.

State Agency and Region:

Montana Department of Public Health & Human Services / Mountain Plains Region

What Adjustment(s) is the State Requesting *(e.g. core verification and interview adjustment)*

Periodic Report Flexibility for Non-Extended Recertification Cases in the months of October, November and December 2020

Demonstrated Need for Extension of the Adjustment *(This should be based on operational data provided by the State, not a narrative. Data to support requests would be expected to include data on including lessened workforce capacity, increased recertifications, and/or increased case actions, among other supporting information.)*

- Please see the attached data document

How Does the State Plan to Transition to the New Normal *(The State should provide the region with a detailed plan that shows how and when the State will return to its “new normal” -- that is a steady operation that may in fact entail higher caseloads than experienced pre-Covid -- including a phased in approach.*

- Currently hiring to fill the 27+ vacancies listed above. The start date for this group is the week of September 14, 2020. This group will be in On-the-Job training at the time the November and December 2020 Recertifications/Simplified Reports are due. This will help with the anticipated increase in Simplified Reports and Recertifications coming due in October, November and December of 2020.
- Montana will continue to maintain appropriate coverage of the Public Assistance Helpline while offices remain closed to in-person visits. This would include extending the Public Assistance Helpline hours from 8:30 a.m. – 4:30 p.m. to 7:00 a.m. – 6:00 p.m. The state can support the extended hours by allowing staff to work temporary alternate schedules such as four ten-hour days.
- Continued staggered due dates for Simplified Reports and Recertifications. This includes Simplified Reports and Recertification that are existing as well as that were pushed out due to COVID-19 waiver

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** N/A
2. **Type of request:** Adjustment - Periodic Report Flexibility for Non-Extended Recertification Cases
3. **Regulatory citation:** 7 CFR 273.10(f), 7 CFR 273.14 and 7 CFR 273.2(e)(1)
4. **State:** Montana
5. **Region:** Mountain Plains
6. **Regulatory requirements:** 7 CFR 273.10(f) states the state agency must certify each eligible household for a definite period of time, assigning the longest certification period possible based on the predictability of the household's circumstances. The certification period cannot exceed 12 months except to accommodate a household's transitional benefit period. 7 CFR 273.2(e)(1) represents the need for face-to-face interview for households with a 12-month certification at initial certification and at least once every 12 months thereafter. 7 CFR 273.14 forbids households from participating beyond the expiration of the certification period assigned.
7. **Proposed alternative procedures:**

This adjustment will allow State agencies to use periodic report (Simplified Report) procedures to establish a new certification period only for households due for recertification who did not have their certification periods extended under previous adjustments. The periodic report (Simplified Report) would be used in lieu of the application for recertification and stay consistent with the periodic report (Simplified Report) procedures. Any reported household circumstances that are unclear or questionable will be required to be followed up on.

Montana will maintain mandatory reporting requirements that take place in between certification periods.

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 more effective and efficient administration of the program. The approval of this adjustment would allow Human and Community Services (HCS), part of the Department of Public Health and Human Services (DPHHS), to ensure households continue to receive their SNAP benefits during this health crisis.

At this time the State of Montana anticipates a 58.21 percent combined increase in Recertifications and Simplified Reports for the month of November and a 48.58 percent combined increase in December 2020, compared to the same months last year. Between these two months the average increase is 53.35 percent. Many businesses in Montana continue to close for an unexpected period to prevent the unnecessary spread of COVID-19 bringing about a loss of wages and increasing the number of new applications for SNAP benefits.

With the anticipated increased workload, there would be an increase in calls from individuals trying to complete their recertification and initial application interviews. Add to that 27+ open positions within the State and wait times on the Public Assistance Helpline will skyrocket, creating more barriers. Being able to have a portion of the Recertifications replaced with a Simplified Report and no interview will help decrease barriers for Montana SNAP families.

9. Caseload information, including percent of caseload and description of population expected to be affected by this waiver:

This adjustment will impact all on-going SNAP customers with a Recertification due in November and December 2020 that was not already pushed out. For November 2020 there are 4513 existing SNAP Recertifications due and in December 2020 there are 5297 existing SNAP Recertification due. This adjustment would positively affect a total of 9810 SNAP households. For full data, please see the attached tables.

10. Anticipated impact on households and State agency operations:

If approved, this adjustment will ensure Montana SNAP recipients continue to receive vital food benefits. New applicants will be more likely to receive benefits timely and ongoing household will be more likely to continue receiving the benefits they are eligible for.

11. Anticipated implementation date and time period for which waiver is needed (please indicate if the waiver approval is needed to make system adjustments):

This adjustment would impact SNAP Recertifications due in the months of November and December 2020 only and will need to be ready to implement at the beginning of October 2020 to ensure proper messaging to the households (i.e. correct notices sent).

12. Proposed quality control review procedures:

Montana Quality Control will continue to review cases in accordance with current Quality Control procedures outlined in the FNS-310 Handbook.

13. Name, title, and email of requesting official:

Name: Christie Twardoski

Title: Policy/Systems Bureau Chief

Email: ctwardoski@mt.gov

14. Date of request: 08/31/2020

15. State agency staff contact:

Name: Stephanie Jenewein

Title: SNAP Program Manager

Email: sjenewein@mt.gov

16. Regional Office contact person (*to be completed by FNS regional office*):



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PERIODIC REPORT FLEXIBILITY FOR NON-EXTENDED RECERTIFICATION CASES

Montana 2019 – 2020 Recertification & Simplified Report Data (Oct, Nov & Dec)

	OCTOBER			NOVEMBER			DECEMBER		
	2019	2020	% Increase	2019	2020	% Increase	2019	2020	% Increase
Recertifications (Existing)	5016	4765		4396	4513		5280	5297	
Recertifications (Extended)*	0	1335		0	2442		0	2548	
Recertification Total	5016	6100	21.61%	4396	6955	58.21%	5280	7845	48.58%
Simplified Reports (Existing)	4121	2108		3991	1600		4176	1562	
Simplified Reports (Extended)*	0	2863		0	3555		0	4119	
Simplified Report Total	4121	4971	20.63%	3991	5155	29.17%	4176	5681	36.04%
Grand Total	9137	11071	21.17%	8387	12110	44.39%	9456	13526	43.04%

* Extended 6 months from April, May and June 2020

Montana 2019 – 2020 Application Data (May, June & July)

	MAY			JUNE			JULY		
	2019	2020	% Inc or Dec	2019	2020	% Inc or Dec	2019	2020	% Inc or Dec
SNAP Applications - Expedite	2608	1438	-30.52%	2409	1583	-34.29%	2734	1664	-39.14%
SNAP Applications - Regular	2595	1803	-30.52%	2503	2066	-17.46%	2805	2272	-19.00%
Grand Total	5203	3241	-37.71%	4912	3649	-25.71%	5539	3936	-28.94%