



Steve Bullock, Governor

Sheila Hogan, Director

March 20, 2020

Dana Platin
Regional Division Director-SNAP
1244 Speer Blvd #903
Denver, CO 80204

Dear Ms. Platin,

Montana is requesting to waive the following regulations in response to the COVID-19. The requests will minimize or prevent the negative impact to SNAP households during the crisis period. These regulations are:

- Regulatory citations, 7 CFR 273.10(f)(5) and CFR 273.12(a)(5). They extend certifications periods by 12 months.
- Regulatory citation, 7 CFR 273.2(e)(1). This would allow for the initial application interview to be waived.

Montana is requesting that these waivers remain in place until the COVID-19 crisis is over but would want to review at 90 days.

If you have any questions, please contact Christie Twardoski at (406)444-1917 or ctwardoski@mt.gov.

Sincerely,

Justine Welker
Interim SNAP Program Manager

Cc: Christie Twardoski

STATE WAIVER REQUEST

1. Waiver Serial Number (if applicable):

2. Type of request:

Initial

3. Regulatory citation:

7 CFR 273.2(e)(1)

4. State:

Montana

5. Region:

Mountain Plains Region

6. Regulatory requirements:

Regulation at 7 CFR 273.2(e)(1) provide that states must have a face to face interview at initial certification and at least once every 12 months thereafter.

7. Proposed alternative procedures:

Montana is requesting a waiver be granted to waive interviews for 90 days for all initial applications during April, May and June due to the COVID-19 pandemic. This would ease the requirement for participants to complete an interview and allow for faster and more efficient processing during this health crises.

The waiver will be re-evaluated at 90 days to see if an extension will be needed.

NOTE: Montana has requested to extend certification period for 12 months.

Montana assumes the waiver will be granted and therefore this waiver only applies any initial Food Stamps applications. If for some reason the request to extend certification period for 12 months is denied, this waiver will be updated to include re-certifications.

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 effective and efficient administration of the program. The approval of the waiver would allow DPHHS to process applications

without requiring interview so that households can receive SNAP benefits during this health crisis without putting the public at risk.

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

Montana currently averages 4902 initial SNAP applications monthly as of February 2020. The waiver will be applied statewide.

10. Anticipated impact on households and State agency operations:

The waiver will allow participant's applications to be approved without requiring an interview during this time of health crisis. Other processing and verification requirements will still be followed.

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

Will be implemented upon waiver approval for the period of 90 days or until COVID-19 health crisis has passed. Will be re-evaluated at 90 days.

12. Proposed quality control review procedures:

No special QC procedures are required for cases subject to the provisions of the waiver

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

Name: Christie Twardoski

Title: Policy/System Bureau Chief

Email: ctwardoski@mt.gov

14. Date of request: 03/20/2020

15. State agency staff contact:

Name: Justine Welker

Title: Interim SNAP/QA Program Manager

Email: jwelker@mt.gov

16. Regional Office contact person (to be completed by FNS regional office):
Philip Fraley, Philip.fraley@usda.gov, 303.844.0341