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Commissioner

Meredith J. Telus  
Director

STATE OF NEW HAMPSHIRE  
DEPARTMENT OF HEALTH AND HUMAN SERVICES  
*BUREAU OF IMPROVEMENT & INTEGRITY*  
*QUALITY ASSURANCE UNIT*

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April 16, 2020

Bonnie Brathwaite  
Food Stamp Program  
USDA Northeast Region  
10 Causeway ST  
Boston MA 02222

Dear Ms. Brathwaite:

Enclosed, please find New Hampshire's request for a waiver that would allow the State to hold harmless approved SNAP waivers for 275 days, from March 1, 2020 to November 30, 2020. The State also requests to allow the State Quality Control Reviewers to accept household verbal statement as verification of any elements when verification sources are unable to be contacted and/or unable to provide verifications requested due to COVID-19.

Thank you for your consideration of this request. If you have any questions, please call me at 603-271-9238.

Sincerely,

*Denise Lamere*

Denise Lamere, Administrator  
Quality Control and Federal Eligibility Unit  
97 Pleasant St., Concord NH 03301

## STATE WAIVER REQUEST

QUALITY CONTROL HOLD HARMLESS-APPROVED SNAP WAIVERS- 275 DAYS FROM MARCH 1, 2020 TO NOVEMBER 30, 2020 DUE TO COVID-19

ACCEPT HOUSEHOLD VERBAL STATEMENT AS VERIFICATION OF ANY ELEMENTS-WHEN VERIFICATION SOURCES ARE UNABLE TO BE CONTACTED AND/OR UNABLE TO PROVIDE VERIFICATIONS REQUESTED DUE TO COVID-19

1. **Type of request:** Initial
2. **Regulatory citation:** 7 CFR 273.10; 7 CFR 275.12; 7 CFR 275.13, 7 CFR 275.23
3. **State:** NH
4. **Region:** NERO
5. **Regulatory requirements:** Each State is responsible for conducting quality control reviews for SNAP households, selected from households that are participating in SNAP (actives) and households whose participation was denied, suspended, or terminated (negative). Quality control determine if households are eligible and receiving the correct allotment, by comparing the eligibility data gathered during the review against the State agency authorized allotment. Quality control reviews of negative cases are conducted to determine whether the agency's decision to deny, suspend, or terminate the household was correct. Quality Control must review cases against the SNAP Program standards established in the Food and Nutrition Act of 2008 and regulations as stated in the Code of Federal Regulations (CFR).

Due to COVID-19, the State Agency has currently been approved for waivers to Extend Certification Periods; Waive Periodic Reporting, issue Emergency Allotments to Current SNAP Households, Acceptance of Telephonic Signatures and Waive the requirement to create an audio recording of the household attestation or link the recording to the household case file. The State agency has submitted other SNAP waivers and is currently in discussion regarding other possible waiver submissions.

The closing of business and schools due to COVID-19 as well as the NH Governor's stay at home order, has limited Quality Control's ability to verify elements such as income, student status, resources, shelter and utilities, as normal QC appropriate sources are unable to provide or respond to verification requests.

**Proposed alternative procedures:** The State of NH is requesting a waiver to allow a 275-day hold harmless period for all waivers related to COVID-19.

The State of NH is requesting a waiver to accept household verbal statement as verification of any elements when verification sources are unable to be contacted and/or unable to provide verifications requested due to COVID-19.

6. **Justification for request:** COVID-19
7. **Caseload information, including percent of caseload and description of population expected to be affected by this waiver:** The number of households receiving SNAP in NH in February 2020 was 38,772(actives). The total number of households whose SNAP participation was denied, terminated, or

suspended in February 2020 was 3311(negatives). Since the QC selection process involves a random sample of all active and negative cases, all households have the potential to be affected by this waiver.

8. **Anticipated impact on households and State agency operations:** This waiver will provide consistency to each case selected for the QC review process.
9. **Anticipated implementation date and time period for which waiver is needed (please indicate if the waiver approval is needed to make system adjustments):** The State is requesting a 275-day hold harmless period beginning March 1, 2020 through November 30, 2020.

The State of NH is requesting a waiver to accept household verbal statement as verification of any elements when verification sources are unable to be contacted and/or unable to provide verifications requested due to COVID-19 -from January 1, 2020 to November 30, 2020.

10. **Proposed quality control review procedures:** QC exclude any variances that occur due to the implementation of any waivers related to COVID-19 for 275 days. Exclusions should apply until such time as the affected household is recertified or the state agency is otherwise required to act on a reported change. The variance exclusions will apply to all currently certified households, all households that are recertified, and households that are newly certified during the months of March, April and May 2020. The hold harmless period does not apply to future applicants who apply outside the 275-day exclusionary period.

If QC is unable to obtain verifications for any element, QC will accept the household verbal statement as verification, when verification sources are unable to be contacted and/or unable to provide verifications requested due to Covid-19 from January 1, 2020 to November 30, 2020.

11. **Name, title, and email of requesting official:**

**Name:** Meredith Telus

**Title:** Director, Division of Program Quality and Integrity

**Email:** Meredith.telus@dhhs.nh.gov

12. **Date of request:** April 16, 2020

13. **State agency staff contact:**

**Name:** Denise Lamere

**Title:** Quality Assurance and Federal Eligibility Unit Administrator

**Email:** Denise.Lamere@DHHS.NH.GOV

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