

WAIVER REQUEST – NEW JERSEY

1. **Waiver serial number:** N/A
2. **Type of request:** Initial
3. **Primary regulation citation:** Title 7 – Agriculture Subpart C – QC Reviews (275.10 through 275.14)
4. **Secondary regulation citation, if any:** N/A
5. **State:** New Jersey
6. **Region:** Mid-Atlantic Region
7. **Regulatory requirements:** As part of the Performance Reporting System, each State agency is responsible for conducting quality control reviews.
8. **Proposed alternative procedures:** New Jersey, like most other states, is operating under a State of Emergency relating to the public health crisis caused by the coronavirus. There are currently over 23,000 residents that have tested positive and 355 deaths as of the end of March. SNAP operations are currently depleted due to multiple factors including reduced staff, social distancing policies, and significant increases in applications. Our proposal is to suspend QC reviews for the remainder of FY2020.
9. **Justification for request:** With limited SNAP operations, an increase in the State's caseload, social distancing policies, lack of documentation, lack of system access to collected information, operational waivers, and other pandemic factors, we do not believe that our quality control reviews will achieve the stated objectives of creating a (1) systematic method of measuring the validity of the food stamp caseload, (2) a basis for determining error rates, (3) a timely continuous flow of information on which to base corrective action at all levels of administration, and (4) a basis for establishing State agency liability for errors that exceed the national performance measure.

Reduced staff. SNAP Operations are currently depleted due to multiple factors including reduced staff and social distancing policies. Eligibility Staff has been reduced to about 15-70% of staff depending on the County office due to school closures, health concerns, employees with compromised immune systems, and direct COVID-19 infection. In addition, social distancing policies such as multiple shifts and alternating schedules further reduce the available staff. Our offices are running on reduced staff (beyond the already reduced numbers) in order to keep proper distancing in the office, to spread out work spaces, and reduce contagion spread. Requests to have County staff scan case files for QC reviews will add a further burden on our operations.

Increased caseload. Furthermore, we are seeing a significant increase in our SNAP caseload. We currently have approximately 6 times the amount of online applications as we had on our busiest

day pre-COVID-19. We expect this caseload to increase as businesses close or significantly reduce their hours, residents experience economic impacts due to job suspensions or losses, more people are unable to work at consistent hours due to social distancing, more people learn about our programs and start to apply for benefits, and operational waivers to ease the burden on eligibility workers go into effect. With our reduced staff, the increased caseload puts a further strain on our capacity.

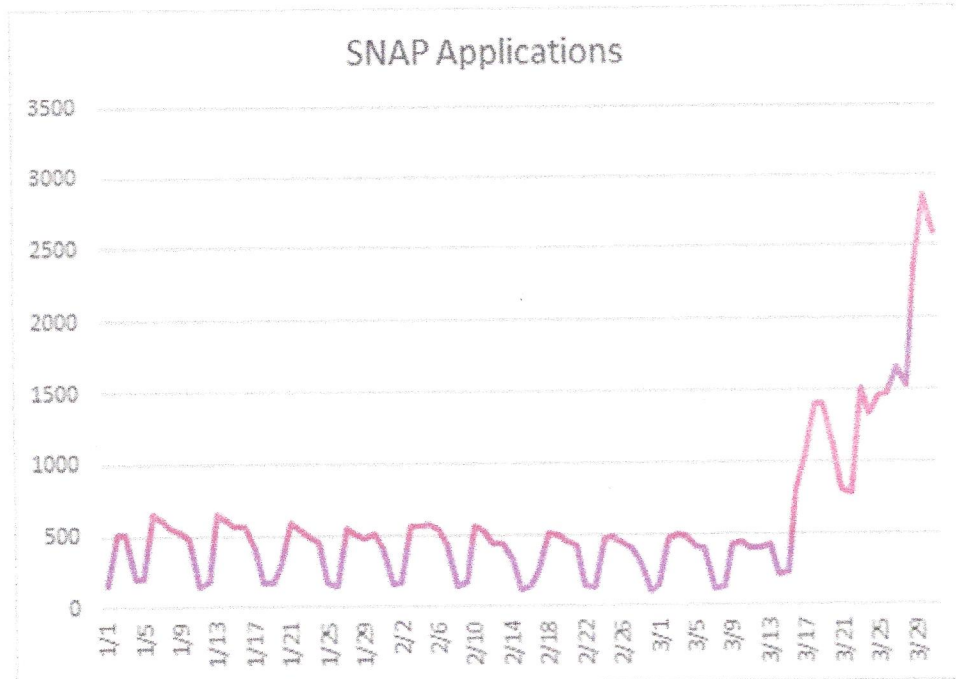


Figure 1: Online SNAP Applications daily. TANF, GA, and Medicaid applications have all seen a similar increase.

Lacking documentation and verification. With limited resources to conduct our operations, we may be unable to follow our normal procedures of having our County operations scan case files and verifications into our document imaging system. Without that capacity, QC reviews cannot be properly completed. Furthermore, QC staff may be unable to obtain needed outside verifications in order to complete reviews. All non-essential businesses are closed and even upon resuming normal operations, they will not be in a position to respond to verification requests.

Telework Limitations. In response to the pandemic, our office has instituted work from home policies. Currently, all SNAP QC staff are instructed to work from home until further notice. Most of our QC staff is unable to view our OneTrac, FAMIS, DIMS, and other eligibility and imaging systems. Currently, we only have 6 staff members out of 20 SNAP QC staff with remote access to these systems. Given the massive demand State-wide and infrastructure issues, we do not foresee our remaining QC staff receiving that access in the immediate future. Furthermore, as the pandemic emerged we were in the process of shifting from paper to electronic files. However, this process was not complete and we still utilize paper files to review cases. Also, our order of phones and laptops for our QC staff has been postponed as priority is given to operational essential functions. Given the limited access to our offices, we are no longer able to process QC reviews as efficiently.

Change in SNAP procedures and policies. With the blanket waivers that have been granted in order to address operational burdens due to COVID-19, the data collected will not align with previous and future fiscal years. This change will limit the information's use for developing an error rate and creating accurate corrective action. Also, the differing data will be less effective for establishing State agency liabilities. Furthermore, the changes in policies, including both State and Federal emergency interventions, cause changes in how we should review our QC sample. Staff will need to be re-trained and SNAP QCS may need to be reprogrammed to handle the novel blanket waivers. In addition to this, new interventions are being proposed and passed at a rapid pace which will be a continual change to our process.

Delay in timely normal operations. Moreover, once we are not in a state of emergency and normal operations resume, we will see a misrepresentation of case accuracy and procedures as offices work to catch up and ramp up to full capacity. We estimate 3-6 months to catch up on caseload work and resume proper up-to-date operations after the lifting of a state of emergency. Furthermore, we will see an increase in caseloads for certifications that were pushed back 6 months (blanket waiver from FNS) which will cause a further delay in attaining normal operational timelines.

Best utilization of staff resources. Lastly, in this time of critical need, SNAP QC staff can be better utilized to serve our customers and support operations in order to ensure program access and integrity. They can also be used to develop and execute a more accurate methodology to assess errors and develop corrective actions for this unique time period.

10. Anticipated impact on households and State agency operations: This request will allow us to improve our public health response to the spread of the coronavirus. We will also be able to allocate staff to operations and develop procedures to more accurately assess corrective actions and errors during the state of emergency.

11. Caseload information, including percent, characteristics, and quality control error rate for affected portion: This will include all SNAP QC reviews in FY2020.

12. Anticipated implementation date and time period for which waiver is needed: This will start immediately upon approval of this waiver and will go through the end of FY2020.

13. Proposed quality control review procedures: Quality control reviews will begin on October 1, 2020 under normal conditions.

14. Signature and title of requesting official:



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15. Date of request: April 2, 2020