



STATE OF NEW MEXICO
Human Services Department
Governor Michelle Lujan Grisham
David R. Scrase, M.D., Cabinet Secretary
Angela Medrano, Deputy Cabinet Secretary
Kari Armijo, Deputy Cabinet Secretary

March 23, 2020

Dwight Crudup Regional
Director
Southwest Region US DA/FNS
110 Commerce Street, Room 5-C- 30
Dallas, Texas 75242

Subject: SNAP Waiver of Interview

Dear Mr. Crudup:

New Mexico, like many of its surrounding states, is operating under a State of Emergency relating to the public health crisis caused by COVID-19. There are currently over 1,300 cases in the United States. Currently, NM has 65 positive cases of COVID-19. It is also expected that since testing is relatively new, the number of positive cases is set to increase exponentially. Social distancing is the primary non-hygiene related preventative measure identified to prevent the spread of this communicable disease.

On March 12, 2020 New Mexico declared health emergency. New Mexico will allow self-attestation for all eligibility criteria when documentation is not readily available; this will be the case with many of our customers as many businesses are closing making it difficult to impossible for customers to obtain necessary verification. When the applicant's income attestation is below the applicable income standard, but data sources indicate that income is above the applicable income standard, then a reasonable explanation will be requested to explain the discrepancy. This includes a verbal or written statement from the applicant clarifying the difference. If no electronic data sources are available, paper sources will also be used.

New Mexico anticipates that this will positively impact all households who submit a new application or recertification for benefits; their cases will not pend for documentary evidence if client statement can be obtained. It will allow customers to receive the much-needed assistance while not having to overcome uncommon barriers to provide verifications.

If additional information is needed, your staff may contact Gavino Archuleta, SNAP Program Manager, at 505-827-7244 or via e-mail at Gavino.Archuleta@state.nm.us.

Thank you for your assistance in processing this request.

A handwritten signature in black ink, appearing to read "Karmela Martinez".

Karmela Martinez, Division Director
New Mexico Human Services Department Income
Support Division

Waiver Request Verification Requirements Waiver

1. **Type of Request:** Initial
2. **Primary Citation:** 7 CFR 273.2(f), 7 CFR 273.2(f)(4)(i)-(v)
3. **Secondary Regulation Citation:** N/A
4. **State:** _ New Mexico _
5. **FNS Region:** _SWRO _
6. **Act and Regulatory Requirements:** 7 CFR 273.2(f) states that verification is the use of documentation or a contact with a third party to confirm the accuracy of statements or information. 7 CFR 273.2(f)(4)(i)-(v) provides federal guidance on the sources of verification, what can be accepted as verification and how different factors can be verified.

7. **Proposed Alternative Procedures:** On March 12, 2020 New Mexico declared a health emergency, New Mexico will allow self-attestation for all eligibility criteria when documentation is not readily available; this will be the case with many of our customers as many businesses are closing making it difficult to impossible for customers to obtain necessary verification. When the applicant's income attestation is below the applicable income standard, but data sources indicate that income is above the applicable income standard, then a reasonable explanation will be requested to explain the discrepancy. This includes a verbal or written statement from the applicant clarifying the difference. If no electronic data sources are available, paper sources will also be used.

When an applicant attests to income above the applicable income standard and data sources indicate that income is below the standard, then the state accepts the attested amount. The Notice of Case Action (NOCA) explains how income was calculated and offers an opportunity for individuals to dispute the income calculation if they disagree.

The State agency will use all available data sources to verify income. If the information obtained from the electronic data sources and the information provided by or on behalf of the applicant are both above, at, or below the applicable income standard, the State must make an eligibility determination on the SNAP application.

8. **Justification for Request:** On March 12, 2020 New Mexico declared a health emergency and is aggressively taking necessary steps to maintain services for our applicants and provide eligibility determinations quickly and accurately,

It is recognized that all New Mexicans have many new barriers which have been caused by the declared health emergency. Applicants are being faced with many unanticipated barriers, such as the loss of income due to mandated business closures. Many businesses closed abruptly and did not provide documentation or verification to our applicants to verify their loss or new income.

New Mexico anticipates an increase in applications for benefits due to being laid off or having a reduction in employment hours. During this time of need it is imperative that all customers that are eligible for benefits receive them quickly to reduce hunger insecurities. It is also recognized that many customers may have difficulties and uncommon barriers due to the declared health emergency making it difficult for them to gather and provide all necessary verifications.

9. **Anticipated Impact on Households:** New Mexico anticipates that this will positively impact all households who submit a new application or recertification for benefits; their cases will not pend for documentary evidence if client statement can be obtained. It will allow customers to receive the much-needed assistance while not having to overcome uncommon barriers to provide verifications.
10. **Affected Caseload:** Any household that submits a new application, recertification or has changes to be reported for their benefits. Mandatory verification as they are currently completed will be resumed beginning in the 4th month after the declared health emergency has ceased.
11. **Anticipated Implementation Date:** New Mexico anticipates implementation of the waiver requirements immediately upon approval to ensure those families that are eligible for SNAP receive them quickly and client statement will be used as verification to process applications..

New Mexico will provide proper guidance and training to all staff to ensure that all applications are processed utilizing the proper types of verification. Staff will also receive guidance about when the mandatory verification methods will resume which will be in the 4th month after the declared health emergency has ceased.

12. **Proposed Quality Control Procedures:** This waiver request and proposed alternative procedures do not affect quality control sampling or procedures.
13. **Signature and Title of Requesting Official:**



Karmela Martinez, Director, New Mexico Department of Human Services
Email for transmission of response: Karmela.Martinez@state.nm.us

14. **Date of Request:** March 23, 2020