

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** Initial
3. **Regulatory citation:** 7 CFR 273.5 (b)(5) and 273.5(b)(6) Students
4. **State:** Oklahoma
5. **Region:** Southwest
6. **Regulatory requirements:** 7 CFR 273.5 covers Student policy for Supplemental Nutrition Assistance Program (SNAP). Under this section, it describes the characteristics of a client that considers them to be a Student under SNAP policy. It also gives a list of exemptions that would allow a Student to be eligible for SNAP. Two of the exemptions are as follows: 273.5(b)(5) 'Be employed for a minimum of 20 hours per week and be paid for such employment or, if self-employed, be employed for a minimum of 20 hours per week and receiving weekly earnings at least equal to the Federal minimum wage multiplied by 20 hours...' 273.5(b)(6) 'Be participating in a State or federally funded work study program during the regular school year.'
7. **Description of alternative procedures:** On March 15, 2020, Governor Kevin Stitt of Oklahoma issued Executive Order No.2020-07 and 2020-08, Declaration of a State of Emergency to Coordinate Response and Protective Actions to Prevent the Spread of COVID-19. On March 13, 2020 President Donald Trump declared a national state of emergency due to the spread of the COVID-19 virus. With this current State of Emergency, many school campuses are closed and students are finishing out the school year with online classes. Along with school campuses being closed, many businesses have reduced their hours of operation causing many Oklahomans work hours to be reduced. Under this Waiver, the Oklahoma Department of Human Services (OKDHS) would waive the work requirement for students. If a student is not meeting another exemption as outlined in 273.5(b), the Student would be considered eligible due to the COVID-19 crises.
8. **Justification for request:** With the COVID-19 crises, many businesses have closed or reduced their hours of operation. With less work being available, it is virtually impossible for a student to meet the required 20 hours of work per week. Even if they are working, it is very hard on the staff to verify the hours are being met. Also many school campuses are closed therefore staff cannot verify if a student is approved for work study and the Students are not able to participate in their state or federally funded work study program. Waiving these two requirements for Students, would ensure that Oklahomans who meet all other eligibility requirements for SNAP can have access to food during this crisis.

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.

- 9. Anticipated impact on households and State agency operations:** If approved, this waiver would impact several Oklahoma families. With school campuses being closed, many of our Students have returned home or found a temporary place to reside. With Students being home, the families have another person in the home and being able to allow the Student to be eligible would allow more SNAP benefits for the family to ensure everyone has access to food.

This waiver is not anticipated to affect the State agency operations. Operations will proceed as normal.

- 10. Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable):** This information would not be applicable for this waiver.

- 11. Anticipated implementation date and time period for which waiver is needed:** Upon approval of this waiver, OKDHS will immediately apply the new exemption to Students who do not otherwise meet a student exemption. OKDHS is requesting this waiver for a period of 2 months or 60 days from the date of the approval.

OKDHS will utilize media press releases along with social media and our Agency website to provide awareness to recipients and venders of SNAP of the approved waiver.

- 12. Proposed quality control review procedures:** No special QC procedures are required for cases subject to the provisions of this waiver. As outlined in the QC 310 Handbook, the State agency shall review cases against the Food Stamp Program standards established in the Food Stamp Act and regulations taking into account any FNS approved waivers that have been implemented or State options to deviate from specific provisions.

- 13. State agency submitting waiver request and State contact person:**

The State agency submitting this waiver request is the Oklahoma Department of Human Services. The state agency contact person is Susan Baker, Program Field Representative, SNAP-LIHEAP Section, Adult and Family Services.

- 14. Signature and title of requesting official:**



Patrick Klein
Adult and Family Services Director
Patrick.Klein@okdhs.org

- 15. Date of request:** April 2, 2020

16. State agency staff contact (name/email/telephone):

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