



Food and
Nutrition
Service

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Date: June 1, 2020

Subject: Supplemental Nutrition Assistance Program (SNAP)
State Options for Fiscal Year 2020 Management Evaluations
Disrupted by COVID-19

To: State SNAP Directors
All States

Each fiscal year, State SNAP agencies (States) must conduct Management Evaluations (ME reviews) in certain project areas within the State. States must schedule and complete these ME reviews based on the requirements of 7 CFR 275.5(b)(1) and the areas of program operation targeted for the fiscal year by the Food and Nutrition Service (FNS). However, the COVID-19 public health emergency has disrupted State ME activities. All States, to some extent, must adjust their plans, methods, and schedules for Fiscal Year 2020 due to the unprecedented challenges and potential risks posed by the COVID-19 public health emergency. In making these adjustments, FNS advises States to consider the following areas of State discretion:

1.) States may adapt ME methods and review procedures. States have a degree of discretion regarding ME methods and review procedures, consistent with 7 CFR 275.9(a). In response to the disruptive effects of the COVID-19 public health emergency, FNS encourages States to use this discretion to tailor or streamline their ME methods as appropriate. For example, ME activities that would normally take place onsite can be completed remotely to the extent practicable. States do not need FNS approval to adapt their ME methods and review procedures, but they should document the change and why it was appropriate based on the COVID-19 public health emergency. This documentation may be helpful to determine best practices moving forward and would allow FNS to appropriately account for the changes in any future Federal reviews of the State ME system.

2.) States may request an alternate ME review schedule. States have the opportunity to request to alter their ME review schedule, as per 7 CFR 275.5(b)(2). This option may provide considerable administrative relief because, under an alternate ME schedule, a State could postpone MEs into FY 2021 or FY 2022, provided that each project area in the State is reviewed at least once every 3 years and the alternate schedule meets all other standards set by 7 CFR 275.5(b)(2). States would submit a request to alter their ME review schedule to their respective FNS Regional Office. FNS Regional Offices will work to review and respond to any such requests as quickly as possible.

3.) FNS will allow States to change the ME target areas for FY 2020. The COVID-19 public health emergency has introduced new administrative

challenges and has in some cases necessitated temporary policy adjustments and waivers to mitigate those challenges. Based on these factors, FNS will allow States the discretion to change the areas of program operation targeted by FNS in its July 11, 2019, memorandum¹. For example, rather than reviewing household reporting requirements, as was required by the July 11, 2019, memo, a State may choose to instead review application processing and certification procedures, or other operations that are at higher risk of deficiency or have greater need of evaluation, relatively speaking, due to the impacts of the COVID-19 public health emergency. States do not require FNS approval to change an ME target area for Fiscal Year 2020, but they should document the change and why it was appropriate based on the COVID-19 public health emergency. This documentation will allow FNS to appropriately account for the changes in any future Federal reviews of the State ME system.

FNS appreciates your ongoing efforts to monitor and uphold your State's compliance with SNAP requirements, even amid the current adversities presented by the COVID-19 public health emergency. Please be advised that the contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies. If you have any questions or require assistance, please contact your FNS Regional Office. We stand ready to provide additional technical assistance upon request.

Sincerely,

Jessica Shahin
Associate Administrator
Supplemental Nutrition Assistance Program

¹The Fiscal Year 2020 State Target Memo was issued by FNS on July 11, 2019, and is available at: <https://fns-prod.azureedge.net/sites/default/files/media/file/SNAP%20FY%202020%20State%20ME%20Target%20Memo.pdf>.