Eric Holcomb, Governor
State of Indiana

Division of Family Resources
402 W. WASHINGTON STREET, ROOM W392
INDIANAPOLIS, IN 46204-2747

March 26, 2020

Julie Mikkelson, Director
Supplemental Nutrition Assistance Program
USDS, Food and Nutrition Service
77 West Jackson Blvd 20th Floor
Chicago, IL 60604-3507

Dear Ms. Mikkelson:

Attached please find a new waiver request in response to the March 13, 2020, national declaration of emergency due to the coronavirus (COVID-19) pandemic as well as the public health emergency declared in Indiana on March 6, 2020. Approval of this waiver will allow us to continue to focus only on new SNAP applications as they continue to be received. Further, while the number of applications increases, the current workforce level to process the work, already strained, will be unable to keep up with the demand under the current procedures.

Indiana is requesting a waiver of all closures and benefit reduction adverse actions for 90 days or until the month following the month the state of emergency ends.

If you have any questions or comments, please contact David Smalley at David.Smalley@fssa.in.gov or (317) 232-2010.

Thank you for your consideration of this request.

Sincerely,

Adrienne Shields, Director
FSSA/Division of Family Resources

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**

2. **Type of request:** New

3. **Regulatory citation:** 7 CFR 273.13

4. **Secondary regulation citation, if any:**

5. **State:** Indiana

6. **Region:** Midwest Region

7. **Regulatory requirements:** The Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.13 requires that States must complete an adverse action to terminate a SNAP case when they are found to no longer be eligible.

8. **Proposed alternative procedures:** Indiana FSSA/Division of Family Resources is requesting to waive all closures and/or benefit reduction adverse actions for 90 days. This waiver request would affect all active cases during April, May and June 2020. The exception to this waiver will be for death notifications of single person households and those households where a reported change in household composition is reported and would need to be processed in order that the separated household can apply on their own.

9. **Justification for request:** On January 31, 2020, the International Health Regulations Emergency Committee of the World Health Organization declared the outbreak of COVID-19 a public health emergency of international concern as well as Health and Human Services Secretary, Alex M. Azar II, declared a public health emergency for the United States. The Governor of Indiana, Eric Holcomb, declared a public health emergency for the entire state of Indiana on March 6 2020, (Executive Order 20-02) to protect the well-being of the citizens of Indiana from the dangerous effects of COVID-19. In addition to the state-declared emergency, on March 13, 2020, President Trump declared a national state of emergency over the COVID-19 pandemic. Approval of this waiver will assist in protecting the lives, safety and health of the citizens of Indiana due to limiting personal contact (social distancing) to help prevent the rapid spread of this virus.

   This will help prevent exposure of our customers, as well as state employees, to COVID-19. Additionally, this waiver will allow DFR local office staff the time to focus on new SNAP applications rather than processing changes that would decrease clients' benefits and requesting/obtaining documentary or collateral contact verifications. It would also remove the potential of client's benefits terminating for failing to comply with the verification request during the emergency. Further, while the number of applications increases, the current State workforce level to process the work, already strained, will be unable to keep up with the demand.

10. **Anticipated impact on households and State agency operations:** This waiver seeks to allow SNAP recipients to continue receiving benefits during the time Indiana is under a state of emergency; changes would be reported and verifications would be obtained at the next recertification. Additionally, this waiver will allow DFR local office staff the time to focus on new SNAP applications rather than processing changes that would decrease clients' benefits and requesting/obtaining documentary or collateral contact verifications. It would also remove the potential of client's benefits terminating for failing to comply with the verification request during the emergency. Further, while the number of applications increases, the current State workforce level to process the work, already strained, will be unable to keep up with the demand.

11. **Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable):** This waiver will apply to all SNAP recipient households. Indiana's federal fiscal year (FFY) 2018 quality control error rate was 7.18%. The number of SNAP recipients as of January 2020 was 561,268. We have also seen a spike in SNAP applications received this week. In one day this week, we saw an increase of more than double the amount of SNAP applications normally received and we anticipate this increase to continue.

12. **Anticipated implementation date and time period for which waiver is needed:** Immediately upon approval for 90 days or until the month following the month the state of emergency ends.

13. **Proposed quality control review procedures:** Cases will be reviewed in accordance with this waiver approval.

14. **State agency submitting waiver request and State contact person:** Indiana FSSA/Division of Family Resources. State policy contacts: David Smalley and Suzanne Tryan.

15. **Signature and title of requesting official:**

Adrienne Shields
Director, FSSA/Division of Family Resources
Adrienne Shields@fssa.in.gov

16. **Date of request:** March 26, 2020

17. **State agency staff contact (name/email/telephone):** David Smalley, David.Smalley@fssa.in.gov, (317) 232-2010

18. **Regional office contact person:** Jenie Farinas, Jenie.Farinas@usda.gov