Appendix F.3.

Federal Register Comment 3

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STATE OF NEW MEXICO
Human Services Department
Michelle Lujan Grisham, Governor
Kari Armijo, Acting Secretary
Alex Castillo Smith, Deputy Secretary
Kathy Slater Huff, Acting Deputy Secretary
Lorelei Kellogg, Acting Medicaid Director

Request for Comments on How Have SNAP State Agencies Shifted Operations in the Aftermath of COVID-19? (SNAP COVID Study)

Comments are invited on:
(a) whether the proposed collection of information is necessary for the proper performance of the agency's functions, including whether the information shall have practical utility;
Yes, Since the COVID-19 Public Health Emergency, The New Mexico Human Services Department (NMHSD) has worked with Federal partners for all programs of assistance to implement waivers and options that offer flexibilities for existing eligibility and reporting requirements. These flexibilities enable HSD to implement precautionary safety measures while maintaining customer service and access to benefits. These waivers include eliminating wet signatures on applications; eliminating interviews for applications; and extending recertifications to increase benefit retention. New Mexico implemented different waivers and policy changes, such as Recertifying Households Using Periodic Reporting Procedures, Waiving Fair Hearing Timeframes, Waiving Interviews at Certification and Recertification when ID is Verified and Mandatory Verifications Complete. HSD assisted with process and procedure during COVID-19 by using the waivers detailed above. If New Mexico is chosen, NMHSD will use the COVID study as a positive opportunity for growth. NM HSD did a survey during COVID with constituents and found that many preferred to do business utilizing virtual options. The Pandemic required the department to drastically change the way business was conducted and implement this very quickly. Through these changes, it was recognized that the constituents along with department administration would greatly benefit from more automated and virtual options; allowing Robotic Processing Automation (RPA) would increase productivity, reduce human prone errors, reduce wait times for those eligible for emergency services, reduce administrative efforts on tasks that can effectively be completed by RPA and increase time for staff to concentrate on more difficult tasks.

(b) the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions that were used;
Post analysis of the data on the tables provided would not impose a large burden on our staff, we are prepared to absorb this initiative as a successful unwinding the goal of NMHSD. NMHSD would like to request more details about what additional work would be involved with the study such as data pulling (if required) and examples of the data?

(c) ways to enhance the quality, utility, and clarity of the information to be collected; and
Utilizing tenured staff, employed through the pandemic, will provide a wide range of opinions on the operational changes made in response to the COVID-19 Pandemic will enhance the quality, utility, and clarity of the information. Additionally, it is vital that there is a collaborative approach taken, so all participants are leveraging data and analysis for comparative purposes and trend analysis.

(d) ways to minimize the burden of the collection of information on those who are to respond, including use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.
The NMHSD utilizes Microsoft teams for calls, meetings, and most daily interactions. If FNS were to utilize Microsoft teams and or Zoom, to schedule virtual meetings this would minimize the burden of trying to meet with different offices/rural areas around the state and allow for effective planning strategies.