Washington State Tribal SNAP Eligibility Determination Program



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2. fax:

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3. emails

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Introduction

The purpose of this guide is to provide an overview of Washington state's commitment to collaborating closely with tribal governments and Urban Indian Organizations in the planning and operation of Department of Social and Health Service programs, while recognizing tribal sovereignty.

The Department of Social and Health Services, referred in this document as DSHS, recognizes tribal governments are uniquely positioned to serve Native Americans in their communities better. Some of the key values to a collaborative relationship with tribes are building and maintaining trust, communicating effectively, uplifting the voices of the Indigenous communities and respecting tribal sovereignty.

Washington state's Tribal Supplemental Nutrition Assistance Program Eligibility Demonstration Project accomplishes that by promoting tribal governments to partner with the department to use non-state staff to determine SNAP eligibility and thus help increase SNAP access for those who may not have the resources and information on how to access public assistance programs through a state agency.

Government-to-Government Foundation

The relationship between the state of Washington and the tribal governments within its borders has been inconsistent since statehood was granted. History from a tribal perspective is known to Native people through oral traditions, which are entrusted to each generation to retain, practice and provide the next generation the knowledge of tribal culture (Washington State Governor's Office of Indian Affairs). The stories told vary by regional location and the differing experiences of those who lived in the state of Washington for eons, which affects the relationship and legal history between the state and sovereign nations.

Tribal Sovereignty

Indian tribes, as governments, occupy an important place in our federal governmental

system. Federal law recognizes federally recognized tribes as possessing sovereignty over their members and their territory. Different from a minority or racial classification, tribes are separate, independent political entities. Sovereignty means tribes have the legislative, executive and judicial power to make and enforce laws, and to establish courts and other forums for resolution of disputes.

Washington state has acknowledged the need to develop an action plan to strengthen relations between the state and tribes based on a foundation of historical understanding and shared objectives. The impacts of state laws are unavoidable as they affect tribal sovereignty, including climate change, access to clean food and water and maintenance of traditional hunting and gathering spaces.

Washington state must understand each tribal government's decisions of today have impacts on the generations of the future. Additionally, Washington state must acknowledge its contributions to sovereign nations' trauma, poverty and history to establish trust and understand the steps needed to achieve mutual goals.

Centennial Accord

In 1989, the Washington state governor's office and tribal governments cooperatively developed a written framework for enhancing their relationships. Known as the Centennial Accord, it provides the framework for government-to-government relations and implementation procedures to ensure improved communications, a commitment to resolve issues and recognition of the inherent sovereignty of the tribal nations. In 2012, the Centennial Accord was made into law with the passage of RCW 43.376, Government-to-Government Relationships With Indian Tribes. The Centennial Accord and Millennium Agreement are fundamental to the department's ability to work with tribal governments, as DSHS provides a large array of programs and services across Washington state. DSHS American Indian Administrative Policy 7.01 is the DSHS implementation of the Centennial Accord.

Indian Policy Advisory Committee

In 1977, the Indian Policy Advisory Committee was established to assist the collective needs of

the tribal government and advise the department's secretary. IPAC consists of delegates from each of Washington state's 29 federally recognized tribes and seven Urban Indian Organizations to guide implementation of the Centennial Accord and the department's Administrative Policy 7.01, thereby ensuring quality, comprehensive service delivery to all American Indians and Alaska Natives in Washington state. IPAC meets twice a year with DSHS leadership. The department uses these meetings and the guarterly IPAC ESA Subcommittee meeting to share and discuss issues and topics of mutual concern, including the expansion of the Tribal **SNAP Eligibility Determination Demonstration** Project.

Governor's Tribal Leaders Social Services Council

In 2021, tribal leaders requested the formation of the Governor's Tribal Leaders Social Service Council. The council is comprised of tribal leaders, tribal social service program directors, the Governor's Office and the appointed leaders of the Department of Social and Health Services, Department of Corrections, Department of Commerce, Health Care Authority and the Department of Children, Youth and Families. The Governor's Tribal Leaders Social Services Council provides a statewide structure that meets twice yearly to resolve social services issues. It acts as a current advisory body to service agencies that influence people's health and well-being, like economic stability, access to quality health care and education, social policies, climate change and racism. The council provides a unified space where tribes and agencies can discuss resolutions to cross-agency issues and service delivery that cannot be resolved at the agency level.

DSHS Administrative Policy 07.01

The department establishes administrative policies to regulate the internal management or actions of its employees. Our Administrative Policy 7.01 covers the department's American Indian Policy and defines the department's commitment to consult with federally recognized Indian tribes of Washington state and collaborate with UIOs and individual American Indians

and Alaska Natives in the planning and delivery of our service programs. The policy outlines general guidelines, a communication protocol and a consultation protocol.

General quidelines include:

- The department recognizes, honors and supports consultation with tribes on a government-to-government basis.
- · When making policy on Indian issues, the department must ensure recognition of political governing bodies, self-determination and self-governance and work in cooperation and coordination with the Governor's Office of Indian Affairs.
- The department must ensure programs and services to tribes are culturally relevant and in compliance with this policy.

Communications

In Washington state, the department's managers and employees in positions with decision-making authority or policy-changing authority must take the DSHS Administrative Policy 7.01 training on information about the government-to-government relationship, as required by state law (RCW 43.376, section 040). Providing staff with training increases the state staff's cultural competency in providing effective services when working with tribal governments and providing services to tribal members. Staff members who work directly with tribes also take the Governor's Office of Indian Affairs Government-to-Government training.



Communication is crucial in establishing trust and building relationships between DSHS and tribal governments. DSHS Administrative Policy 7.01 includes a communications protocol to assist staff when communicating with tribal governments and UIOs. Administrators send the following types of formal correspondences:

- Establishment of intergovernmental agreements
- Consultation requests and announcements
- · Announcements of scheduled monitoring or site visits
- · Monitoring and site-visit reports
- Announcement of Administrative Policy 7.01 meetings
- Requests for formal input
- · Tribal leader letters sharing important information

An administrative policy and clear communication protocol are crucial to the success of the Tribal SNAP Eligibility Determination Demonstration Project, ensuring the understanding of DSHS roles and responsibilities when working with tribes.

In addition to the administrative policy, we communicate policy and legislation that may affect tribal programs and tribal communities through tribal leader letters.

DSHS and ESA Culture **ESA Unified Goal and Strategic Plan**

DSHS consists of various administrations tied together by a single mission: to transform lives. In state fiscal year 2023, more than one in five Washington residents turned to the DSHS **Economic Services Administration for assistance** with cash, food, child support, disability determination, support for transitioning to employment and other services. A customer base of over 1.7 million people receives services from over 3,900 ESA employees, who are dedicated to connecting children, adults and families to resources and opportunities that help them reach their full potential (DSHS Economic Services Administration, 2024).

To accomplish our overall mission, ESA has a cross-divisional strategic plan, which directly supports and aligns with Gov. Jay Inslee's executive order to create Results Washington, thereby establishing goals of continuous improvement of services, outcomes and performance of Washington state government.

Community Services Division

ESA's Community Services Division provides direct client services to the public through a network of 48 local Community Services Offices. Services are also provided through a variety of outstationed staff in different communities; eight fully self-contained and equipped mobile offices consisting of two 40-foot trucks and six smaller 28-foot trucks; and a single, statewide Customer Service Contact Center (DSHS Economic Services Administration, 2024).

As part of ESA's unified goal to reduce poverty by 50% from 2015 to 2025 in a way that eliminates disparities, CSD is working actively to be a partner of choice by welcoming new tribal partners and identifying innovative ways to collaborate for mutual, supportive relationships that work toward positive outcomes for shared customers.

CSD sees opportunity to further enhance our partnerships with tribal governments by expanding the Port Gamble S'Klallam Tribe pilot project to other tribes across the state. Other tribal governments inquired about determining their own SNAP eligibility and began working with DSHS to determine how to expand access to SNAP eligibility determination.

ESA's ability to achieve its goals is based on shifting its culture to include policies that enhance the equity, diversity and inclusion of Washingtonians when accessing our cash, food and medical programs.

Proactive Equity Antiracism

In April 2020, Washington state established the Office of Equity, the first in the nation, to promote access to equitable opportunities and resources that reduce disparities and improve outcomes statewide (Washington State Legislature, 2020).

An executive order by Gov. Inslee established the Proactive Equity Antiracism framework to address the exclusion, marginalization and oppression of Black, Indigenous, People of Color, people with low income, immigrants and refugees, people living with disabilities and other groups, which have resulted in deeply entrenched educational, economic and health inequities (State of Washington, 2022).

Washington state agencies are encouraged to tailor their values using the PEAR Ecosystem Plan and Playbook. With goals to improve outcomes that benefit all tribes, communities and employees, CSD uses Equity Diversity, Access and Inclusion principles in removing disparities through policies, practices and programs.



Equity, Diversity, Access and Inclusion

CSD has focused on expanding tribal partnerships and increasing access to programs and services. Many tribal members distrust state and federal governments due to actions, policies and broken treaties, which resulted in the oppression of tribes and tribal members. Tribal communities experience poverty at higher rates than the state as a whole and have been marginalized through historic trauma. CSD recognizes that distrust is a barrier.

The DSHS Office of Equity, Diversity, Access and Inclusion was established to create an environment of mutual respect, equity and acceptance of the persons we serve. Using EDAI concepts

allows CSD to recognize some members of the tribal community face such barriers as transportation or lack of internet access, which could prevent them from doing business with a government agency, and thus they may not be accessing SNAP benefits but would do so if such were offered by the tribal government.

Food insecurity is high on tribal lands. A survey done by the University of Washington School of Public Health in 2021 showed 67% of tribal households in Washington state were food-insecure. In reference to concerns over food-assistance eligibility and application, respondents indicated barriers to using food assistance included:

- · Worrying they wouldn't qualify
- · Being afraid to apply
- · Too much trouble or red tape to apply
- · Distance was too far

Recommendations include increasing state and federal resources to support tribal food system infrastructure (Nutrition, 2021). DSHS's commitment to supporting a tribal government to conduct its own food assistance eligibility supports this recommendation.

Tribal SNAP Demonstration Pilot Washington's SNAP Structure

In Washington state, CSD oversees the administration of SNAP across the state in compliance with federal and state rules. CSD offers access to programs and assistance regardless of location, whether in person or over the phone. Customers can apply for benefits online, by phone, in person at a local DSHS Community Services Office, by mail or by fax.

Though CSD has worked to expand access to Washingtonians through simplified application processes, increasing access to those living in rural areas or tribal lands is an area that needs improvement. In 2009, DSHS partnered with PGST to pilot a Food and Nutrition Service demonstration project to reduce hunger, increase partnerships and improve relationships with tribal governments.

Port Gamble S'Klallam Tribe **Demonstration Project**

In 1996, Congress passed the Personal Responsibility and Work Opportunity Reconciliation Act, which provided federally recognized tribes the opportunity to design and operate their own TANF programs. Port Gamble S'Klallam Tribe was one of the first tribes to start administering Tribal TANF in 1998. Its participation in Tribal TANF established a strong partnership and working relationships between the PGST and DSHS.

PGST operates a successful Tribal TANF program, with staff experienced in providing federally funded public assistance. However, clients receiving TANF from their tribe and needing additional resources were required to apply for and receive other services from the state of Washington, namely SNAP and Medicaid. A pilot project was evaluated to delegate food assistance certification activities to the tribe, allowing Tribal TANF applicants to be served in one location with one application process. Further, tribal members who are not seeking Tribal TANF can be served within their community, rather than traveling a considerable distance to the state office in Bremerton, Washington.

Food and Nutrition Service Waiver

In 2008, Washington state requested a demonstration project waiver from the U.S. Department of Agriculture's Food and Nutrition Service to allow the use of non-merit staff at PGST to



determine SNAP eligibility. As allowed by section 17(b) of the FNS Act of 2008, FNS may waive provisions to conduct experimental projects that may increase the access to nutrition among low-income individuals.

Washington state's request theorized that waiving merit staff requirements for SNAP certification under 7 CFR 272.4 for PGST would increase participation in SNAP when eligibility was determined by the tribal government. In June 2009, FNS granted Washington state's waiver to begin the demonstration project Sept. 1, 2009, for a period of five years. PGST works as a tribal, local office, referred to in this document as a Tribal Service Office.

Merit Staff:

As a condition of eligibility to participate in many federal programs (such as SNAP), state and local governments must develop a merit system for personnel engaged in the administration of the program. While each state government agency has its own merit-personnel system with its own characteristics, all are guided by a set, merit principle. The principles cover recruiting, compensation, training, retention, equal employment opportunity and guidance on political activity.

As tribal staff are not part of the state merit system, they are considered non-merit for purposes of SNAP eligibility certification. As explained in the USDA Food and Nutrition Service's guidance memo from January 2010, states must seek approval from FNS to use non-merit-system personnel to interact with clients in a restricted capacity compliant with federal regulation.

The tribe ensures staff who provide services under the terms of this partnership meet or exceed all applicable federal, tribal and Washington-state statutory requirements for the types of service provided. CSD includes tribal hiring policies in the Indian Nation Agreement between DSHS and PGST.

Waiver Reauirements:

A thorough evaluation of the project is required to pilot the theory that tribal members could receive better access to their nutritional needs



if provided by a tribal government. Some of the tribe's waiver requirements are:

- Comply with all application processing and eligibility standards under the Act and Code of Federal Regulation and Washington Administration Codes.
- · Determine eligibility for anyone who applies, and maintain ongoing cases for households with at least one Native American member.
- · Maintain cost neutrality for the duration of the project.
- · Complete an evaluation report to FNS, which includes:
 - The number of applications processed and the average time to determine case eligibility.
 - Accuracy, including case accuracy, payment accuracy and analysis of errors.
 - Participation in multiple programs.
 - The number of first-time, Native American enrollees.

SNAP quality monitoring requirements apply to the tribe, including quality control case reviews for both current participating households (active cases) and those that have been denied, suspended or closed (negative cases). The tribal sites are considered small-project areas, and field operation reviews by management are required every three years.

Reimbursements:

Tribes are allowed reimbursement of their activities related to SNAP eligibility determinations. PGST is able to claim SNAP-related, administrative costs as indicated in 7 CFR 277. The waiver states:

- Only activities related to performing actual SNAP-eligibility determinations will be reimbursable through FNS.
- All reimbursable activities must be coded according to the specific activity. The tribe will code activities associated solely with SNAP eligibility determinations separately.
- FNS will reimburse 75% of the costs associated with project activities exclusively related to SNAP-eligibility determination. The state is expected to contribute 25%.

Washington state worked with PGST to develop procedures for tracking time spent determining SNAP eligibility and completing a voucher submitted to the DSHS fiscal department for reimbursement to receive payment in a timely manner.

Indian Nation Agreements:

An Indian Nation Agreement was signed in 2009 between PGST and DSHS for the purpose of tribal determination of SNAP and Medicaid eligibility for families, children and pregnant women. The agreement is developed in alignment to the purpose and requirements of the FNS approved waiver.

- An Intergovernmental Agreement, referred in this document as an Indian Nation Agreement, means a joint or cooperative agreement between DSHS and an Indian tribe that includes clearly defined purposes, goals and definitions for the agreement between the participants
- Program responsibilities and operations
- Program requirements
- Project-area jurisdictions
- Billing and administrative costs
- Tribal staff assurances
- · Data-sharing requirements for eligibility systems
- Points of contact

PGST's experience in negotiating the Intergovernmental Tribal TANF Agreement with DSHS allowed a better understanding of the agreement, making for a quicker review process by the tribal attorney. The agreement was then signed by the chairman of PGST.

Implementing:

As early as 2009, DSHS and PGST had difficulties implementing the SNAP eligibility project, such as ensuring technology security and proper invoicing. PGST's ongoing program adherence is maintained with the assistance of our contact center staff, who support training, access, security forms and other activities.

DSHS provided PGST with individual assistance and training when it implemented SNAP eligibility in 2009. DSHS's individual focus contributed to PGST's continually high accuracy rate in determining food benefit amounts. High accuracy rates can also be attributed to the fact that PGST staff are trusted members of the community and have better outcomes than the state agency when attaining information or verification.

Annual, Unduplicated SNAP and FAP Households Served by the Port Gamble S'Klallam Tribe and Payment Error Rate (PER), FFY 2016 – FFY 2023

FFY	Number of Households*	Demonstration Project QC State-Reported PGST PER
2016	179	1.50%
2017	169	2.78%
2018	139	3.10%
2019	132	0%
2020	117	2.50%
2021	80	4.76%
2022	77	3.03%
2023	108	6%

^{*}Source: DSHS-ESA/EMAPS #6001B, using the ACES Data Warehouse as of the April 2024 load, produced April 25, 2024.

Expanding the Tribal SNAP Demonstration Project

Implementation Plan Development

After 10 years of success piloting the SNAP eligibility demonstration project at PGST, CSD convened a workgroup in 2019 to create a robust implementation plan to expand the pilot to other interested tribes. Based on the scope of work, we identified subject matter experts and tribal partners who needed to be at the table. The workgroup identified a need for clear structure and tracking of deliverables to develop an implementation plan to send for FNS consideration and approval.

Using project management methodologies, Washington state was able to maintain project scope, including the onboarding of new tribes to determine eligibility for SNAP benefits, by using lessons learned from the PGST project as the foundation of the work. The project scope did not include implementation, changes to federal or state law, additional full-time employees for the planning process or programs beyond food-assistance eligibility.

Project Management Principles

Project management is a proven methodology used by CSD for over a decade to help plan and guide complex projects from start to finish through coordination and collaboration across the division. A project encompasses five stages: initiation, planning, execution, monitoring and control, and closure.

It was important during the planning phase to include all parties responsible for implementing a Tribal Service Office. The initial Tribal SNAP Eligibility Determination Demonstration Project used initiation and planning phases to develop an implementation plan to onboard new tribes as SNAP Eligibility CSOs for use upon FNS waiver approval.

Due to the size of the project, a workgroup was convened that included:

· Sponsors, a project lead and a project manager

 Project team members from Food Programs and Policy, Operations, Information Technology Services, EBT, Division of Program Integrity, Hub Imaging Unit, Tribal Relations, Community Service Office staff and PGST

Project members broke into smaller subgroups that defined the necessary requirements for implementation of each phase.

Workgroup Initiation

In collaboration with current staff of PGST, the project team learned the importance of creating a solid foundation of communicating and understanding expectations of tribal nations and organizations who might participate. The workgroup identified benefits and challenges from the PGST demonstration project to help ensure process improvements would be implemented and to establish a standard approach to onboarding interested tribal nations and organizations.

We identified four focus areas of the plan that needed further review. Subgroups were created to focus on the following phases of the implementation plan:

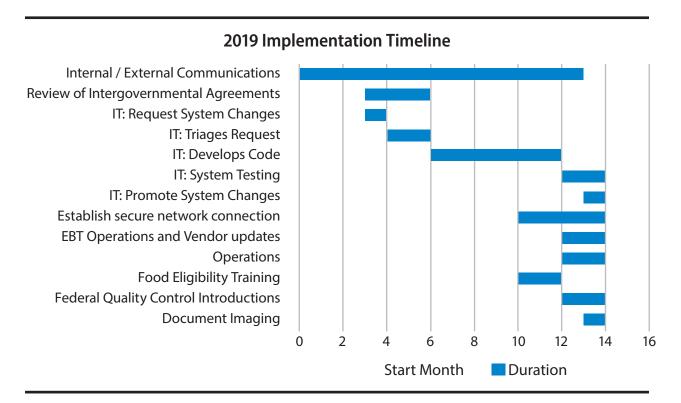
Announcement of FNS waiver approval PHASE 1: • Internal and external communications with state employees, other agencies Communications and tribes in compliance with our Administration Policy 7.01 • Establishment of a central SharePoint web page Review of hardware and equipment needs • Establishment of a secure network connection and access to eligibility PHASE 2: **Technology** • Creation of updates to eligibility systems, to include the new Tribal Service Offices, and letters with appropriate address • Working with each tribe's Information Technology staff to resolve firewall and other security concerns PHASE 3: • Review of federal mandatory posters and publications required in Tribal Service Offices **Operations** · Support with procedures and risk management • Compliance with federal civil rights and non-discrimination policies Offer of training classes and training schedules by the department PHASE 4: · Access to state eligibility, procedural and administrative manuals **Training and Accuracy** • Establishment of a frequency of reviews by the department • Maintenance of an understanding of federal requirements to comply with quality control and management evaluations

Estimated Timeline

The Tribal SNAP Expansion Project of 2019 consisted of subject matter experts from DSHS workgroup members and PGST. Its goal was to develop a tentative timeline based on a phased approach of what a new Tribal Service Office would need. In 2019, based on available technology, processes and staffing resources at that time, it was determined the total, anticipated timeline schedule would take up to 13 months for each Indian tribe or UIO.

A large portion of time was allotted for technology changes. Each tribe is added into the DSHS Automated Client Eligibility System to ensure Tribal Service Offices have identified the correct project area and used correct addresses on letters, and that they receive access to determine food eligibility.

The timeline needs to maintain flexibility to accommodate each tribe's needs or barriers and consider its current state of technology, processes, staffing and resource capacity.



Expansion Waiver Request

In December 2022, Washington state submitted the implementation-plan waiver request to the FNS Western Region Office to extend and expand the PGST demonstration project. CSD modified the expansion request to include five interested tribes. Four tribes opted out of participating in the demonstration, and five confirmed interest in implementing eligibility determinations for tribal community members.

Some tribes opted out, as their tribal members may be ineligible for SNAP because they are serviced by such other programs as Food Distribution Program on Indian Reservations, or because they receive such other types of income as per capita payments that may put them over income for SNAP.

Tribes who opted to participate in the eligibility-determination demonstration include:

- Confederate Tribes of the Colville Reservation
- Lummi Nation
- Ouinault Indian Nation
- Ouileute Nation
- Spokane Tribe of Indians

Each of those five tribes operates Tribal TANF programs. Because of this, each tribe already has the infrastructure needed to operate SNAP, which includes:

- Office space
- Staffing
- Technological equipment
- An existing process to work directly with outstationed CSD staff
- · Familiarity with the eligibility system
- Familiarity with reporting requirements as required for reports to the Administration of Children and Families
- · Familiarity with budgeting for federal programs
- Experience making eligibility determinations for federal programs

Although eligibility determination staff already exists in these areas, additional staff may be reguired to operate SNAP eligibility determination. These tribes attested to having the financial supports needed to hire additional staff if necessary. Only the Quileute Nation expressed concern with having staff hired in time to implement the project, although it is actively recruiting. They would like to be included in the demonstration but may need to implement at a later date than the other tribes.

Some tribes expressed concerns about time-consuming processes that may delay implementation, such as approval through legal and business committees of necessary Indian Nation Agreements.

In March 2023, FNS requested further information on coverage area and target population for the five new tribes. That information included locations and counties, populations in the area that would be served, and data on enrolled tribal members and individuals receiving SNAP in the coverage area.

In June 2023, DSHS received federal approval from the FNS to expand the Tribal SNAP Eligibility Determination Demonstration Project to five new tribes. Stacy Dean, deputy undersecretary for Food, Nutrition and Consumer Services, shared the news at an event on June 14, 2023, on Port Gamble S'Klallam tribal lands (USDA Food and Nutrition Service, 2015). The meeting included tribal expansion representatives (Lummi Nation, Quinault Tribe, Quileute Tribe and Spokane Tribe of Indians), DSHS Deputy Chief of Staff, Director of Office of Indian Policy, CSD leadership and FNS.

Conclusion

Through conversations at PGST in June 2023, we determined that we needed to reassess various aspects of the current demonstration project's processes. Based on the increased scope of the project, we needed a full-time CSD position devoted to this work. Concerns brought by PGST regarding invoicing identified a need for adjustments to the implementation in a post-COVID environment. The initial implementation plan created in 2019 would need to be reviewed to ensure the changes meet the needs of each tribe.

CSD hired an administrator and a project manager to oversee the demonstration project and its expansion. They developed a Readiness Assessment Tool to determine the needs of each tribe, as communications, operations and training vary based on its existing infrastructure. Additionally, as staffing and ability to train vary, estimating an individual timeline for each tribe allows for better, more realistic management of the project.

CSD completed the Readiness Assessments Tool with the new tribes, and it became clear we would need to expand our initial timeline and

take a staggered approach to ensure support for each tribe. We received the following feedback from tribes:

- · Difficulty seeing the infrastructure and timelines
- Staff focused only on Basic Food training would upend other services the tribe provides
- · Competing priorities for the tribes, as they provide a vast array of services
- · Complexities involving state and tribal firewalls

To address these concerns and ensure we build an infrastructure of support created by the tribes, the workgroup is working through such subgroups as:

- Communications and SharePoint
- Technology and Agreements
- · Operations and Escalation
- Training and Quality

We acknowledge PGST's participation in and foundation for the project work have been crucial for the success of the demonstration project and resulting expansion approval. However, DSHS recognizes it cannot treat PGST as a monolith in this work. Ensuring we work with each tribe based on its particular situation honors its sovereignty. To build and maintain trust, the agency must establish individual timelines, identify and acknowledge each tribe's strengths and needs, and continue to pursue a collaborative government-to-government relationship with each tribe.

Appendix

Tribal SNAP Project Checklist

States considering implementing Tribal SNAP should also consider the following items to ensure a successful project:

Complete	Process	Notes
	 Collaboration With Tribal Governments Understand the relationship between the state and tribal governments. Build and maintain relationships with tribes. Work with tribes when proposing, drafting and changing policies that may affect tribal communities. 	Relationships founded on trust and mutual respect lead to improved support services for families in tribal communities.
	 Communications Protocol Create general communication guidelines for staff. Create general consultation guidelines for staff. 	Communication is crucial in establishing trust and relationship-building between the state and tribal governments.
	 Infrastructure for Tribes Meet with each tribe to go over technology needs, system needs, etc. Provide training on how to operate the system used to determine SNAP eligibility. 	Every tribe has different needs. It is important to provide each with the tools and resources needed to ensure success of the program.
	 Quality Planning Create a project timeline. Convene workgroups. Develop a charter that defines clear expectations, scoping and resources. Create a risk management plan that helps foresee potential issues needing mitigation. 	Using project management and Lean Six Sigma principles, help maintain the project scope, including everything necessary to onboard new tribes and determine eligibility for SNAP benefits.

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