

## STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** New
3. **Regulatory citation:** 7 CFR 273.29(a)(2), 7 CFR 273.2 (e), 7 CFR 273.14(b)(3), and 7 CFR 273.2(i)(3)(iii)
4. **Secondary regulation citation, if any:**
5. **State:** Ohio
6. **Region:** Midwest Region
7. **Regulatory requirements:** Supplemental Nutrition Assistance Program (SNAP) regulations at 7 C.F.R. 273.2(a)(2) requires that the application process include an interview.  
  
Regulations at 7 C.F.R. 273.2(e) requires that the State agency interview households for eligibility before certifying.  
  
Regulations at 7 C.F.R. 273.14(b)(3) requires that State agencies interview households as part of the recertification process  
  
Regulations at 7 C.F.R. 273.2(i)(3)(iii) require the State agency to conduct the interview (unless the household cannot be reached) and complete the application process within the expedited service standards.
8. **Proposed alternative procedures:** For SNAP applications received or households due for recertification in July 2020, the State will not be required to interview a household at initial application or recertification, provided that the applicant's identity has been verified and all other mandatory verifications in 7 C.F.R. 273.2(f)(1) have been completed. The State will be required to contact the household if any information on the application is questionable and cannot be verified. The State will make every attempt to verify household circumstances through data matching and mailing or uploading verifications to the State system.
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 Ohio, Mike DeWine, declared a state of emergency for the entire state of Ohio on March 9, 2020, (Executive Order 2020-01D) to protect the well-being of the citizens of Ohio

from the dangerous effects of COVID-19. In addition to the state of emergency, on March 13, 2020, President Trump declared a national state of emergency over the COVID-19 pandemic.

While the number of initial applications has decreased, Ohio will begin completing recertifications and periodic reports (referred to as interim reports in Ohio) in July. Ohio's State of Emergency has not ended and all State staff continue to work remotely. At the beginning of the new state fiscal year (July 1, 2020) there will be furlough days for all exempt staff. County agencies are also facing budget cuts and reduced staffing through layoffs and/or furlough days. Most county agencies are still operating in non-standard ways (i.e. not open to the public, staff working remotely). Below is a breakdown of county operations:

### **County Building Operations**

#### Public Access

- 3% of agencies are open to the public;
- 14% are open with social distancing protocols in place;
- 8% are open with someone at the entrance to divert as much traffic as possible;
- 10% have a portion of their building open to the public;
- 10% are open by appointment only;
- 44% are closed to the public; and
- 11% have other setups.

#### Staff Access

- 22% agencies are open to all staff;
- 56% are open to some staff; and
- 17% limit access to a small number of key personnel; and
- 5% have other setups.

### **County Remote Working Arrangements – staff working remotely**

- 3% of counties report 0%;
- 9% report 1-10%;
- 3% report 11-20%;
- 2% report 21-30%;
- 3% report 31-40%;
- 9% report 41-50%;
- 4% report 51-60%;
- 11% report 61-70%;
- 15% report 71-80%;
- 15% report 81-90%; and
- 26% report 91-100%.

As mentioned above, recertifications and interim reports will resume in July. When recertifications and interim reports were first extended in March, county agencies designed their processes and staffing around processing the surge of initial applications. Approval of this waiver will assist in processing initial applications, recertifications and interim reports while

counties adjust to new procedures and workflows with the current county agency operational set-ups. The waiver will help county agencies maintain workloads and timeliness while also facing budget cuts and reduced staff levels. If the waiver is not approved, Ohio is at a high risk of being unable to provide benefits timely.

- 10. Anticipated impact on households and State agency operations:** This waiver will allow interviews for SNAP application and recertifications to be waived for July 2020 provided that the applicant's identity has been verified and all other mandatory verifications in 7 C.F.R. 273.2(f)(1) have been completed.
- 11. Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable):** This waiver will apply to all SNAP applicants and recipient households. Ohio's federal fiscal year (FFY) 2018 quality control error rate was 7.46%. The number of SNAP recipients as of February 2020 was 1,326,165.
- 12. Anticipated implementation date and time period for which waiver is needed:** This waiver applies to SNAP applications received and recertifications due in July 2020.
- 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:** Ohio Department of Job and Family Services, Betsy Suver.
- 15. Signature and title of requesting official:**

Betsy Suver  
Betsy Suver  
Bureau Chief, Bureau of Cash/Food Policy & Technical Support  
[Betsy.Suver@jfs.ohio.gov](mailto:Betsy.Suver@jfs.ohio.gov)
- 16. Date of request:** June 16, 2020
- 17. State agency staff contact (name/email/telephone):** Ashley Howard, [Ashley.Probst@jfs.ohio.gov](mailto:Ashley.Probst@jfs.ohio.gov), (614) 644-1680
- 18. Regional office contact person:** Jenie Farinas, [Jenie.Farinas@usda.gov](mailto:Jenie.Farinas@usda.gov)



Department of  
Job and Family Services

Mike DeWine, Governor

Kimberly Hall, Director

June 16, 2020

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

Dear Ms. Mikkelson:

Attached please find a request to waive the requirement to complete an interview for initial applications and recertifications prior to approval, provided the applicant's identity has been verified and all other mandatory verifications in 7 C.F.R. 273.2(f)(1) have been completed.

Approval of this waiver will assist in processing initial applications, recertifications and interim reports while counties adjust to new procedures and workflows with the current county agency operational set-ups. The waiver will help county agencies maintain workloads and timeliness while also facing budget cuts and reduced staff levels. If the waiver is not approved, Ohio is at a high risk of being unable to provide benefits timely.

If you have any questions or comments, please contact Betsy Suver at [Betsy.Suver@jfs.ohio.gov](mailto:Betsy.Suver@jfs.ohio.gov) or (614) 425-5859.

Thank you for your consideration of this request.

Sincerely,

Betsy Suver, Chief  
Bureau of Cash/Food Policy & Technical Support  
Office of Family Assistance  
Attachment

30 East Broad Street  
Columbus, OH 43215  
[jfs.ohio.gov](http://jfs.ohio.gov)