



March 20, 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 new waiver requests in response to the March 13, 2020, national declaration of emergency due to the coronavirus (COVID-19) pandemic as well as the state of emergency declared in Ohio on March 9, 2020. This will allow county agencies to focus only on new SNAP applications as they continue to be received, and to process the applications immediately following the interview without waiting for documentary evidence to return. Further, while the number of applications increases, the current county workforce level to process the work, already strained, will be unable to keep up with the demand under the current procedures.

Ohio is requesting waivers to do the following alternate procedures during the state of emergency:

- Supplement all SNAP assistance groups with an additional maximum allotment amount for the assistance group size;
- Permit client statement to be the primary source of verification for all eligibility requirements;
- Process all SNAP applicant households under expedited procedures and only require identity of the applicant and social security numbers to be verified in order to approve benefits;
- Provide all applicant households' expedited certification periods to end four months from the beginning month of eligibility;
- Allow for all certifications periods to be extended by twelve months for all recertifications that become due during the state of emergency;
- Suspend the requirement to provide households with the ability to submit applications and verifications to the SNAP office in person.
- Suspend all reporting requirements during the certification period (including the submission of the Interim Report) during the time Ohio is under a state of emergency; and
- Suspend the requirement for state agencies to notify and grant households of the option to conduct SNAP certification and recertification interviews in-person or in the residence of the individual.

If you have any questions or comments, please contact Betsy Suver at 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

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** New
3. **Regulatory citation:** 7 CFR 273.10(f)(1),(3) and (5)
4. **Secondary regulation citation, if any:**
5. **State:** Ohio
6. **Region:** Midwest Region
7. **Regulatory requirements:** The Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.10(f)(3) provide that the State agency must certify each eligible household for a definite period of time. State agencies must assign the longest certification period possible based on the predictability of the household's circumstances. The first month of the certification period will be the first month for which the household is eligible to participate. The certification period cannot exceed 12 months except to accommodate a household's transitional benefit period. Federal rule 7 CFR 273.10(f)(1) provides that a State agency may certify for up to 24 months households in which all adult members are elderly or disabled. Additionally, 7 CFR 273.(f)(5) provides State agencies the ability to lengthen a household's current certification period once it is established, as long as the total months of the certification period do not exceed 24 months for households in which all adult members are elderly or disabled, or 12 months for other households. If the State agency extends a household's certification period, it must advise the household of the new certification ending date with a notice containing the same information as the notice of eligibility set forth in paragraph (g)(1)(i)(A) of this section.
8. **Proposed alternative procedures:** The Ohio Department of Job and Family Services is requesting a waiver of the regulatory requirement and proposes to extend all certification periods by an additional twelve (12) months for recertifications that become due during the time Ohio is under a state of emergency due to COVID-19. Additionally, the waiver would not require Ohio to send a notice to households regarding the extended certification period. Rather, Ohio would not send the notice of expiration until it would be due under the extended certification period.
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 of 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-declared state of 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 Ohio due to limiting personal contact (social distancing) to help prevent the rapid spread of this virus. It will allow county agencies 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, is at risk of becoming unsteady. Minimizing the number of cases that have to be “worked” in order for individuals to maintain SNAP benefits is crucial. We are requesting a full year extension for all recertifications because only extending recertifications to the month after the state of emergency ends will overwhelm the county agencies and make the recovery from this pandemic continue over a longer period of time.

- 10. Anticipated impact on households and State agency operations:** This waiver will allow currently certified households that become due for a recertification during the state of emergency to continue to receive SNAP for an additional 12 months without the need to redetermine eligibility. This will help prevent exposure of our customers, as well as state and county employees, to COVID-19. Additionally, this will allow county agencies 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, is at risk of becoming unsteady.
- 11. Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable):** This waiver will apply to all SNAP applicant and recipient households. Ohio’s federal fiscal year (FFY) 2018 quality control error rate was 7.46%. The number of SNAP recipients as of December 2019 was 1,316,695.
- 12. Anticipated implementation date and time period for which waiver is needed:** Immediately upon approval for the period of time during which Ohio is under a state of emergency due to COVID-19.
- 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
Bureau Chief, Bureau of Cash/Food Policy & Technical Support
Betsy.Suver@jfs.ohio.gov

- 16. Date of request:** March 20, 2020

17. State agency staff contact (name/email/telephone): Ashley Howard, Ashley.Probst@jfs.ohio.gov,
(614) 644-1680

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