

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** New
3. **Regulatory citation:** 7 CFR 273.2(f)(1), 7 CFR 273.2 (i)(4)(i)(B)(iii)(A&B), 7 CFR 273.10(f)(3)
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 273.2(f)(1) provide the mandatory information that must be verified prior to certification for initial applications.

Regulations at 7 CFR 273.2(i)(4)(i)(B)(iii)(A&B) provide, in part, that if a state agency postpones mandatory verifications and assigns a shortened certification period for expedited households, then the household must reapply and satisfy the verification requirements that were postponed in order to be eligible for subsequent months.

Regulations at 7 CFR 273.10(f)(3) provides that the State should assign each household the longest certification period possible and gives the following options based on household circumstances: 1.) Households should be assigned certification periods of at least 6 months, unless the household's circumstances are unstable or the household contains an ABAWD; 2.) Households with unstable circumstances, such as households with zero net income, and households with an ABAWD member should be assigned certification periods consistent with their circumstances, but generally no less than 3 months; 3.) Households may be assigned 1- or 2-month certification periods when it appears likely that the household will become ineligible for SNAP benefits in the near future. Households processed under expedited processing who are required to return postponed verifications, are given a certification period of one or two months, depending on when in the month the household applied.

8. **Proposed alternative procedures:** The Ohio Department of Job and Family Services is requesting a waiver of the regulatory requirement to verify mandatory verifications in 7 CFR 273.2 (f)(1) prior to certification for initial applications, except for identity and social security number (SSN). Regarding verification procedures, Ohio is seeking to process all applicant households according to expedited guidelines as outlined in 7 CFR 273.2(i).

Additionally, ODJFS is seeking a waiver to allow all households' expedited certification periods to end four months from the beginning month of eligibility. These households will then be recertified under normal recertification processing outlined in 7 CFR 273.14.

- 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.

Currently, only households with extremely low incomes are processed under expedited procedures, while all others follow the 30-day timeframes and require all eligibility requirements to be verified prior to certifying benefits. Certifying all applicants under expedited verification procedures will allow counties to handle the substantial increase in volume of applications and to provide benefits to vulnerable citizens quicker. Additionally, extending the expedited certification period will allow county agencies the time to focus on new SNAP applications rather than checking for postponed verifications and potentially having to terminate benefits. Further, while the number of applications increases, counties will not have the staff capacity to maintain the work and will need to prioritize accordingly. Allowing this exemption will provide needy citizens of Ohio benefits quicker and lessen the strain on county workforce, who were already at capacity.

- 10. Anticipated impact on households and State agency operations:** This waiver will eliminate the requirement for SNAP applicants to submit all needed mandatory verifications. It will also allow applicants to be certified similarly to expedited households with the requirement to only verify identity and social security number as well as be processed under normal recertification processing rules after the emergency ends. Additionally, it will allow these applicants to remain on benefits without further verification requirements until the household is due for recertification.

Due to the expected influx in SNAP applications, we are seeking approval of this waiver to expeditiously ensure SNAP benefits are received timely, to assist county agencies in managing the substantially increased number of applications, and to issue benefits to vulnerable citizens quicker. Additionally, extending the expedited certification period will allow county agencies the time to focus on new SNAP applications rather than checking for postponed verifications and potentially having to terminate benefits. 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.

- 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 until the month following the month the state of emergency ends.

