

## STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** New
3. **Regulatory citation:** 7 CFR 273.2(f), 7 CFR 273.12(a)(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 273.2(f) requires verification of many eligibility requirements. It also requires documentary evidence as the primary source of verification; whenever documentary evidence cannot be obtained or is insufficient to make a firm determination of eligibility or benefit level, the eligibility worker may require collateral contacts. Regulatory requirements in 7 CFR 273.12(a)(5) requires certain reporting requirements for households while receiving benefits, including submitting an interim report in the middle of the certification period. The counties must act on changes and benefits are adjusted accordingly.
8. **Proposed alternative procedures:** The Ohio Department of Job and Family Services is requesting a waiver of the regulatory requirement to permit client statements to be the primary source of verification for all eligibility requirements during the time Ohio is under a state of emergency due to COVID-19.

Additionally, Ohio is seeking to suspend all reporting requirements, including the requirement for Ohio to issue an interim report and for clients to complete an Interim Report while under a state of emergency. Changes would be reported and verifications would be obtained at the next recertification after the emergency ends. Ohio would only act on changes that would result in an increase of the household's benefit during the emergency.

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.

This will help prevent exposure of our customers, as well as state and county employees, to COVID-19. Additionally, this waiver will allow county agencies the time to focus on new

SNAP applications rather than processing changes that would decrease clients' benefits and requesting/obtaining documentary or collateral contact verifications. It would also remove the potential of client's benefits terminating for failing to comply with the verification request during the emergency. 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.

- 10. Anticipated impact on households and State agency operations:** This waiver will allow for individuals to verbally attest to household circumstances impacting eligibility. This will eliminate the time spent requesting and waiting for documents to return and will allow for county agency workers to expeditiously process eligibility after completing the interview. Additionally, this waiver seeks to suspend reporting requirements during the time Ohio is under a state of emergency; changes would be reported and verifications would be obtained at the next recertification. This will allow county agencies the time to focus on new SNAP applications. 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.
- 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                      
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- 16. Date of request:** March 20, 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)

