



Department of  
Job and Family Services

Mike DeWine, Governor

Kimberly Hall, Director

April 17, 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 Ohio's waiver request to exclude the Federal Pandemic Unemployment Compensation (FPUC) income for SNAP assistance groups. We appreciate the opportunity to ease program administration by aligning SNAP policy with those of our other assistance programs to exclude these temporary unemployment benefits. We believe a precedent was set for this exclusion based on the current Census 2020 Demonstration project, which allows Ohio to exclude the income of assistance groups who are employed as Census workers. Allowing workers to have continued access to SNAP would provide a significant boost to local economies. For every \$5 in new SNAP benefits, as much as \$9.20 is generated in total economic activity. We feel that excluding the FPUC benefits will not only offer our clients more food security, but would also benefit the local economy, which is also struggling during this pandemic crisis.

This waiver request is 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 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, as the number of applications increases and the current workforce level, already strained, is at risk of becoming unsteady.

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)

## STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** Initial
3. **Regulatory citation:** 7 CFR 273.9 (b)(2)(ii)
4. **State:** Ohio
5. **Region:** MWRO
6. **Regulatory requirements:** 7 CFR 273.9 (b)(2)(ii)
  - (2) Unearned income shall include, but not be limited to:
    - (ii) Annuities; pensions; retirement, veteran's, or disability benefits; worker's or unemployment compensation, including any amounts deducted to repay claims for intentional program violations as provided in § 272.12; old-age, survivors, or social security benefits; strike benefits; foster care payments for children or adults who are considered members of the household; gross income minus the cost of doing business derived from rental property in which a household member is not actively engaged in the management of the property for at least 20 hours a week.
7. **Description of alternative procedures:**

Ohio proposes to exclude the Federal Pandemic Unemployment Compensation (FPUC) funding from the Supplemental Nutrition Assistance Program (SNAP) budget, allowing the assistance group to receive an additional \$600 per week in unemployment compensation. The FPUC funding exclusion will begin with the person's date of unemployment compensation eligibility or 3/29/2020, whichever came later and will end after payments for the last week of unemployment, on or before July 31, 2020. We believe a precedent was set for this exclusion based on the current Census 2020 Demonstration project which allows Ohio to exclude the income of recipients who are employed as Census workers. This demonstration allows the state to exclude this income from April 1, 2020 through November 30, 2020. The demonstration waiver was approved in part, to ease program administration, by aligning SNAP policy with Temporary Assistance for Needy Families (TANF) and Medicaid policies. The exclusion of this temporary unemployment benefit would benefit families during this challenging time and help meet their basic needs during this pandemic crisis.
8. **Justification for request:**

Ohio has opted to exclude the FPUC of \$600 per week as income for benefit determination of TANF and Medicaid programs. Including this income for only SNAP creates complex determination decisions for eligibility staff. Due to time and funding constraints, we are unable to complete a system change for this new income type. If SNAP must count FPUC as income for benefit determination, the State will be required to develop a manual process to enter and document the income received

in our integrated eligibility system. Manual processes and budgets can lend themselves to be error prone as well as causing local county offices to spend valuable time calculating, documenting and entering this income differently for SNAP than for other programs. This will create additional hardship on our local office workers during this already difficult time. In addition, SNAP recipients will have their benefits impacted during a time in which they are unable to seek employment and have very limited access to additional resources.

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 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.

**9. Anticipated impact on households and State agency operations:**

This waiver will allow participants who receive FPUC to continue receiving SNAP benefits during the COVID 19 pandemic. Approval of this waiver 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.

**10. 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 January 2020 was 1,331,462.

**11. 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.

**12. Proposed quality control review procedures:** Cases will be reviewed in accordance with this waiver approval.

**13. State agency submitting waiver request and State contact person:** Ohio Department of Job and Family Services, Betsy Suver.

**14. 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)

15. **Date of request:** 4/17/2020
16. **State agency staff contact (name/email/telephone):** Ashley Howard,  
[Ashley.Probst@jfs.ohio.gov](mailto:Ashley.Probst@jfs.ohio.gov), (614) 644-1680
17. **Regional office contact person:** Jenie Farinas, [Jenie.Farinas@usda.gov](mailto:Jenie.Farinas@usda.gov)