

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** Initial
3. **Regulatory citation:** 7 CFR 273.14(b)(2) through (4)
4. **State:** Ohio
5. **Region:** MWRO
6. **Regulatory requirements:**

Regulations at 7 CFR 273.14(b)(2) require that State agencies develop an application to be used by households when applying for recertification.

Regulations at 7 CFR 273.12(b)(3) require that State agencies interview households as part of the recertification process.

Regulations at 7 CFR 273.14(b)(4) require State agencies to verify household circumstances as part of the recertification process.
7. **Description of alternative procedures:**

Under this adjustment, Ohio will use periodic report flexibilities in October, November and December 2020 to recertify households that have not had their certification periods previously extended through other adjustments. Ohio will continue to send a notice of expiration and will utilize its reapplication form rather than the periodic report. In keeping with periodic report procedures, an interview will not be conducted. Changes in household circumstances, including changes in income will be verified. If the household reports no changes or enough information has been collected, either through available data sources or through provided verifications, the household will be recertified without any contact from the county agency. However, a county agency will follow up with a household when there is unclear or questionable information. This process will only be used for recertifying households and will not apply to initial applicants.
8. **Justification for request:**

At the start of the COVID-19 public health emergency, FNS granted States a waiver to extend certification periods for cases due to recertify in the months of April – June 2020. This was in response to the state’s diminished workforce capacity, coupled with an increase in SNAP applications. This waiver was essential to ensuring no families lost access to benefits during this crisis. An unfortunate downstream effect of this waiver is an increased number of recertifications now concentrated into the timeframe of October through December 2020. Ohio is requesting to have this waiver for all cases (except for those previously extended) based on the increased volume of recertifications:

- For October 2020, the original number of recertifications due was 51,210 prior to extending April 2020 recertifications; it is now **90,273** recertifications. Also, in October 2019 there were only 36,735 recertifications due, which shows the original number of certifications due October 2020 alone is a significant increase in recertifications from 2019. When combined with the recertifications extended from April 2020, the county agencies will be completing almost three times as many recertifications in October 2020.
- For November 2020, the original number of recertifications due was 44,582 prior to extending May 2020 recertifications; it is now **84,184** recertifications. Also, in November 2019 there were only 30,977 recertifications due, which shows the original number of certifications due November 2020 alone is a significant increase in recertifications from 2019. When combined with the recertifications extended from May 2020, the county agencies will be completing almost three times as many recertifications in November 2020.
- For December 2020, the original number of recertifications due was 56,698 prior to extending June 2020 recertifications; it is now **99,487** recertifications. Also, in December 2019 there were only 35,973 recertifications due, which shows the original number of certifications due December 2020 alone is a significant increase in recertifications from 2019. When combined with the recertifications extended from June 2020, the county agencies will be completing almost three times as many recertifications in December 2020.

The proposed alternative procedures will allow the state the flexibilities necessary to process this work.

9. Anticipated impact on households and State agency operations:

As it stands, the projected recertification workload for the months of October – December exceeds the county offices workforce capacity. This is primarily due to the extension of certification dates from April – June 2020 aided by the FNS blanket certification extension waiver. The proposed modified procedures will allow the Department to maximize its workforce capacity to best ensure continuity of benefits for all eligible households. Without the waiver, there is a risk that there will not be enough recertification interview time slots available in order to complete interviews with all households. Approving this request would allow the state to streamline the recertification process to maximize workforce capacity. The state is confident this approach strikes the important balance of maintaining program access and program integrity in SNAP operations, ensuring all eligible households receive appropriate benefit amounts.

10. Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable): This adjustment request will only be applied to households that have not had their certification periods previously extended through other adjustments. Additionally, this process will be used for recertifying households and will not apply to initial applicants. Ohio’s federal fiscal year (FFY) 2019

quality control error rate was 8.04%. The number of SNAP recipients as of July 2020 was 1,517,574.

11. Anticipated implementation date and time period for which waiver is needed: October 1, 2020 through December 31, 2020

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

15. Date of request: 8/24/2020

16. State agency staff contact (name/email/telephone): Ashley Howard,

17. Regional office contact person: Jenie Farinas,