



January 10, 2023

Action Change Transmittal No. 293

TO: All Cash Assistance Manual Holders

FROM: Matt Damschroder, Director
Ohio Department of Job and Family Services

SUBJECT: **Recertification Interview Requirements**

Background:

The United States Department of Agriculture, Food and Nutrition Service (FNS) issued guidance to assist Supplemental Nutrition Assistance Program (SNAP) State agencies planning for the expiration of the federal public health emergency (PHE). Previous waiver authority during the COVID PHE was a result of the Families First Coronavirus Response Act (FFCRA) and allowed states to adjust issuance methods and application and reporting requirements while the PHE was in place. As the PHE comes to an end, the FFCRA-allowed adjustments for states will also come to an end.

FNS recognizes that states may continue to require some flexibilities to aid in application processing when the PHE ends, especially due to Medicaid unwinding requirements which will impact State workload capacity and resources. To further support SNAP State agencies and SNAP recipients, FNS is offering administrative waivers for up to twelve months for certain processes once the PHE ends. Additionally, States can choose to implement these waivers before the PHE ends for up to 12 months to provide flexibility needed to address caseload and other administrative challenges.

Ohio applied for and was approved for the administrative unwinding waiver for SNAP which allows the recertification interview to be waived at a county option. This waiver will begin in March 2023 and will last for 12 months. Counties will have the choice to opt into the waiver for the first six months of the waiver; then have the choice to opt in or out for the following six months. In order to align procedures for the SNAP and cash assistance programs, if a county implements the waiver for SNAP, it will also apply to the cash assistance programs. Waiving the recertification interview applies to cash assistance/SNAP cases and cash assistance-only cases, including child only. The Ohio Department of Job and Family Services (ODJFS) has outlined the procedures below.

Updated Procedures:

Recertification Application Interview

Effective March 1, 2023- February 29, 2024, a county agency can opt to not conduct an interview at recertification prior to approving OWF or RCA benefits, provided the following are met:

- A JFS 07204 “Request to Reapply for Cash Assistance, SNAP and/or Child Care” form (or equivalent in the Ohio Benefits Self-Service portal) has been received;
- The applicant’s identity has been verified;
- All other verifications required to establish eligibility as outlined in rule 5101:1-2-20 of the Ohio Administrative Code (OAC) have been completed. (i.e. income, social security numbers, age, citizenship, living arrangement, etc.); and
 - A county agency shall obtain verifications (including electronic sources); if documentation is not able to be obtained, the county agency may use a collateral contact. If neither documentation nor a collateral contact can be obtained, client statement may be used. Case notes must clearly document the verification used to make an eligibility determination.
- A county agency is required to contact the applicant if any information on the application is questionable or if verification is incomplete. Contact can be done through a phone call for questionable information. Verifications must be requested by mailing a JFS 07105 “Application/Reapplication Verification Request Checklist.”
- For all work eligible individuals, an appraisal is conducted and a self-sufficiency contract (SSC) or individual opportunity plan (IOP) must be completed and signed prior to authorization.
 - As part of the appraisal process, the county agency must screen for domestic violence and refer any individual who responds affirmatively to a screening question to counseling and supportive services as outlined in rule 5101:1-3-20 of the OAC.
- If an individual requests an interview, the county JFS office must complete an interview.
- ***Recertifications conducted through telephonic applications will still require an interview because of the nature of what is needed to be captured during a telephonic signature.*** Since the signature for a telephonic application is a summary of what the individual attests to during the interview, the interview must still be conducted to gather the necessary information to determine eligibility for the individual to be able to attest to that information.

Choosing to Implement the Waiver

A county will need to inform Program Policy and Systems (PPS) if it will implement this option by sending an email to OFA-PPS@jfs.ohio.gov by the following dates:

- To **opt in** for the first 6 months (March 2023 – August 2023), the county must notify PPS by **January 20, 2023**.

- To **opt in or out** for the second 6 months (September 2023- February 2024), the county must notify PPS by **July 20, 2023**.

When opting into this waiver, it will apply to both SNAP and cash assistance programs. Food Assistance Change Transmittal outlines this waiver option for SNAP assistance.

If you have questions regarding any of the information, please reach out to PPS by sending an email to OFA-PPS@jfs.ohio.gov.