



January 10, 2023

Food Assistance Change Transmittal No. 92

TO: All Food 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 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 in addressing the needs of caseloads 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.

Please find corresponding updates below:

Updated Procedures:

Recertification Application Interviews

Effective March 1, 2023 – February 29, 2024, a county agency can opt to not conduct an interview at recertification prior to approving SNAP 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 mandatory verifications in paragraphs (D) and (E) of rule 5101:4-2-09 of the Ohio Administrative Code (OAC) have been completed.
 - 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.”
- 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. Action Change Transmittal letter #293 outlines this waiver option for cash assistance.

Oral Consolidated Notice and Reporting Requirements

Effective March 1, 2023 – February 29, 2024, since an interview is able to be waived at recertification, the county is not required to provide an oral explanation of work requirements to

the assistance group at recertification. The written JFS 07405 “SNAP Work Requirements Notice” consolidated notice must still be sent.

Additionally, county agencies who have chosen to waive recertification interviews are not required to verbally notify assistance groups of how simplified reporting works and reporting requirements.

Requirement to Screen for SNAP Employment and Training (E&T)

When a county opts to waive the recertification interview requirement, this does not waive the requirement that individuals are screened for participation for SNAP E&T. The county agency is able to identify work registration exemptions based on age, receipt of disability, Ohio Works First (OWF) or unemployment compensation, and others that are identifiable based on information known in Ohio Benefits.

For other possible exemptions, like caring for a disabled individual or pregnancy, additional questions were added to capture this on the JFS 07204 “Request to Reapply for Cash Assistance, SNAP and/or Child Care” form. Counties are required to view this information on the JFS 07204 and if it appears an individual is required to participate, the county agency is required to schedule a SNAP E&T appraisal with the individual.

Implementation:

The JFS 07204 “Request to Reapply for Cash Assistance, SNAP and/or Child Care” form has been amended to capture as much information as possible in order for a caseworker to determine eligibility without needing to contact the client. All SNAP recipients will be sent the amended version of the JFS 07204, not just the recipients in counties who have waived the interview. Ohio Benefits has been updated to include a table of counties who opt into the interview waiver to ensure an appointment is not scheduled and a notice is not mailed.

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

