



## Ohio Administrative Code

### Rule 5101:4-2-09 Food assistance: verification procedure.

Effective: October 1, 2024

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(A) What is verification?

Verification is used to support and document what was reported on the JFS 07200, "Application for Supplemental Nutrition Assistance Program (SNAP), Cash Assistance, Medical Assistance or Child Care Assistance" during the application process and to provide clarification on any questionable information. The county agency is to allow assistance groups at least ten days to provide needed verification.

(B) Whose responsibility is it to provide verification?

(1) The assistance group has primary responsibility for providing verification to support its statements on the application and resolve any questionable information. An assistance group may supply verification in person, through the mail, by fax, electronically, or through an authorized representative. The county agency is not to require the assistance group to present verification in person.

(2) The county agency is to assist the assistance group in obtaining verification provided the assistance group has not refused to cooperate as specified in rule 5101:4-2-01 of the Administrative Code. If it would be difficult or impossible for the assistance group to obtain verification in a timely manner, or the county agency can obtain the verification faster, the county agency is to offer assistance in obtaining the verification.

(3) The county agency is not required to assist an assistance group in obtaining verification of alien status except when the documentation is unclear and the county agency receives the applicant's permission to contact the U.S. citizenship and immigration service (USCIS). The county agency is also not required to assist the assistance group in obtaining verification of shelter costs for an unoccupied home when verification would have to be obtained from sources outside of the county.



(C) What are the mandatory verifications for expedited service certifications?

(1) Identity is the only verification required prior to the authorization of expedited benefits. All other verifications can be postponed when they cannot be submitted within the expedited timeframe. When an authorized representative applies on behalf of the assistance group, the identity of both the authorized representative and the assistance group name is to be verified.

(2) The county agency is to require the applicant to register for work when an exemption is not met. The agency may attempt to register other assistance group members, but it is not to prevent the authorization of an eligible expedited assistance group.

(D) What verification is necessary for normal application processing?

Assistance groups certified under normal processing standards (as opposed to expedited processing standards) are to provide verification of all the following items:

(1) Gross income.

(2) Rent or mortgage payment. Homeless assistance groups claiming shelter expenses are to provide verification of their shelter expense to qualify for the homeless shelter deduction. When a homeless assistance group has difficulty in obtaining traditional types of verification of shelter costs, the county agency is to obtain alternate types of verification that accurately verify the expense.

(3) Utility and shelter expenses.

(4) Non-reimbursable medical expenses. Non-reimbursable medical expenses only apply to assistance group members who are age sixty or over, or who meet the definition of disabled as defined in rule 5101:4-1-03 of the Administrative Code.

(5) Dependent care expenses.

(6) Eligible alien status as defined in rule 5101:4-3-07 of the Administrative Code.



- (7) Social security numbers (SSN). Providing a SSN for each assistance group member is voluntary. However, failure to provide a SSN will result in the denial of supplemental nutrition assistance program (SNAP) benefits for that individual. SSNs provided will be used in accordance with rule 5101:4-3-22 of the Administrative Code. When a SSN has been verified, the county agency is to document the information in the assistance group's file to prevent the unnecessary re-verification of the SSN in the future. The county agency is to accept that a SSN is verified when it was already verified through the OWF or medicaid programs. A verified SSN is to be re-verified only when the identity of the individual or the SSN becomes questionable.
- (8) Residency. Residency is to be verified except in unusual cases such as homeless assistance groups, some migrant farm worker assistance groups, or an assistance group just moving into the county where verification of residency cannot reasonably be provided.
- (9) Identity. Identity applies to the person making the application. Where an authorized representative applies on behalf of an assistance group, the identity of both the authorized representative and the assistance group name is to be verified. Identity may be verified through readily available documentary evidence or, when unavailable, through a collateral contact. Any documents reasonably establishing the applicant's identity is to be accepted, and no requirement for a specific type of document may be imposed.
- (10) Disability. The county agency is to verify an assistance group member is disabled as defined in rule 5101:4-1-03 of the Administrative Code.
- (11) Student income. Student income is to be verified in accordance with rule 5101:4-4-13 of the Administrative Code.
- (12) Physical or mental disability: student exemption. When a person claims to be physically or mentally unfit for purposes of the student exemption contained in paragraph (B)(2) of rule 5101:4-6-04 of the Administrative Code, verification may be needed. Appropriate verification may consist of receipt of temporary or permanent disability benefits issued by governmental or private sources, or a statement from a physician or licensed or certified psychologist. If the individual's physical or mental disability is evident to the county worker verification is not needed but the disability should be noted in the case record.



(13) Child support payments. The county agency is to obtain verification of the assistance group's legal obligation to pay child support, the amount of the obligation, and the monthly amount of child support the assistance group actually pays. Documents accepted as verification of the assistance group's legal obligation to pay child support are not to be accepted as verification of the assistance group's actual monthly child support payments. County agencies are strongly encouraged to obtain information regarding an assistance group member's child support obligation and payments from child support enforcement agency files. The county agency is to give the assistance group an opportunity to resolve any discrepancy between assistance group verification and child support enforcement agency records.

(14) Able-bodied adults without dependents (ABAWDs): hours worked. For individuals subject to the SNAP time limit in rule 5101:4-3-20 of the Administrative Code who are satisfying the work requirement by working, by combining work and participation in a work program, or by participating in a work program that is not operated or supervised by the state or county agency, the individuals' work hours are to be verified. Unpaid work hours are to be verified by using the JFS 7410 "ABAWD Verification of Unpaid Hours."

(15) ABAWDs: countable months in another state. For individuals subject to the SNAP time limit of rule 5101:4-3-20 of the Administrative Code, the county agency is to verify the number of countable months an individual has used in another state when there is an indication the individual participated in that state as defined in rule 5101:4-3-20 of the Administrative Code. The normal processing standards of paragraph (A) of rule 5101:4-2-11 of the Administrative Code apply. The county agency may accept another state agency's assertion as to the number of countable months an individual has used in another state.

(16) Assistance group composition: the county agency is to verify factors affecting the composition of an assistance group only when questionable.

(E) What is the standard verification for categorically eligible assistance groups?

(1) Assistance groups determined categorically eligible because of receipt of Ohio works first (OWF), supplemental security income (SSI) or prevention retention contingency (PRC), the



following factors are waived and do not require verification as described in paragraph (D) of this rule:

(a) Social security number;

(b) Sponsored alien information; and

(c) Residency.

(2) Assistance groups determined categorically eligible because of the notification of the Ohio careline services are to verify the factors as described in paragraph (D) of this rule.

(F) When may an application be approved without verification?

The county agency is not to delay the certification for benefit issuance beyond thirty days:

(1) To an otherwise eligible assistance group to only verify the SSN of an assistance group member.

(2) To verify a claimed but unverified expense as described in paragraph (J) of rule 5101:4-4-23 of the Administrative Code. As soon as all other steps necessary to certify an assistance group are completed, the county agency is to certify the benefits.

(G) What should be done when questionable information is received?

(1) When the applicant provides information that is questionable and may affect the eligibility or benefit level, the county agency is to request verification. The information may be determined to be questionable when what is reported on the JFS 07200 is different from what the applicant reported during the interview, different from the information the agency had already obtained, or different from what may have been reported on a previous JFS 07200.

(2) An example of something that may be determined questionable is when the applicant's expenses exceed the assistance group's income. The county agency is to request additional verification to determine how the expenses are being met. When the applicant does not submit supporting



documentation on how the expenses are being met, that alone is not grounds to deny the application. The county agency is to then explore if the applicant receives any additional income or if there are resources from which they may be paying the expense. The agency is to verify how long the applicant has been managing their finances in this manner and then document the verification in the case file.

(H) What type of verification is to be documented in the case file?

The county agency is to include all information in the case file documenting and supporting the actions taken in determining eligibility. All requests for additional verification is to be documented in the case file. Any actions taken because of the additional verification are to also be included.

(I) What are acceptable forms of verification?

There are four types of verification: documentary evidence, collateral contacts, client statements and home visits. When documentary evidence is not able to be obtained a collateral contact should be acceptable when available. In the event a collateral contact is not available a client statement or home visit may be used. A client statement or home visit should be a county agency's last option; however, when determining benefits the best available information should be used. Further information explaining each verification is below:

(1) Documentary evidence

(a) Documentary evidence can be used as a primary source of verification. Documentary evidence consists of a written confirmation of the applicant's circumstances. Examples of documentary evidence include but are not limited to: pay stubs, rent receipts, utility bills, etc. When the agency uses pay stubs and they are not included in the case file, the agency is to include the name, address, dates, and gross amounts listed on the pay stubs in the case file.

(b) Although documentary evidence is to be a primary source of verification, acceptable verification is not to be limited to any single type of document. The verification may be obtained through the applicant or another source. When documentary evidence cannot be obtained or when what was obtained is insufficient to be able to make a determination, the county agency is to pursue a collateral



contact.

(2) Collateral contact

(a) A collateral contact is an oral confirmation of the assistance group's circumstance by a person not included in the assistance group. The confirmation could be made in person or over the phone. The contact cannot be limited to any one particular person but may be anyone who can provide an accurate third-party verification.

Examples of acceptable collateral contacts include but are not limited to: employers, community action groups, migrant service agencies, landlords, social services agencies, neighbors of the applicant, or other persons not included in the assistance group.

(b) When the county agency is attempting to obtain information from a collateral contact they are to only disclose the necessary information in order to obtain the verification without disclosing the applicant has applied for SNAP. The agency cannot disclose any information the applicant provided nor can there be any information provided to the collateral contact suggesting that the applicant provided any incorrect information.

(c) The county agency is to rely on the applicant to provide the name for a collateral contact. The county agency may select a collateral contact when the applicant fails to select one. A signed release is not needed. The applicant may request assistance in selecting a collateral contact. The county agency does not have to use the collateral contact provided by the applicant if there is reason to believe they will be unable to provide accurate third party verification. The county agency may request an alternate collateral contact from the applicant, select an alternate collateral contact themselves, use another method in obtaining the necessary verification, or conduct a home visit.

(3) Client statement

(a) On a case-by-case basis client statement may be acceptable verification when no other verification is available.

(b) When client statement is used as verification, it is to be documented in the case record.



(4) Home visits

(a) Home visits may be used on a case-by-case basis as verification only when documentary evidence is insufficient, a collateral contact is unavailable and the client statement is insufficient or questionable.

(b) The home visit is to be scheduled in advance with the applicant.

(c) When the assistance group's circumstances appear to be error prone, that alone does not mean a home visit is the most appropriate method of verification.

(J) How are discrepancies in information handled?

(1) When the agency receives unverified information from a source other than the assistance group, the agency is to allow the assistance group a reasonable opportunity to resolve the discrepancy prior to taking any action on the case.

(2) The county agency may attempt to verify the information with a third party and contact the assistance group only when the agency cannot obtain the verification.

(3) When the county agency is notified of information by the income eligibility verification system, the county agency may obtain verification from a third party as specified in rule 5101:4-7-09 of the Administrative Code.

(K) What verification is needed at recertification?

At recertification the county agency does not have to verify unchanged information unless the information is questionable or outdated. The county agency is to verify the elements of eligibility that are subject to change. Changes reported during recertification are subject to the same verification procedures that apply during normal application processing as described in paragraph (D) of this rule.

(L) What verification is needed for reported changes?





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Changes reported during the certification period are subject to the same verification procedures that apply at initial certification.