



Ohio Administrative Code

Rule 5101:9-32-01.1 County case review and certification process.

Effective: May 1, 2026

This rule describes the methodology that each county agency will follow when conducting a payment error review of a supplemental nutrition assistance program (SNAP) case. Every review shall be conducted in accordance with this rule and with the guidance provided by the Ohio department of job and family services (ODJFS).

(A) What is the county payment error reviewer's responsibility when conducting a case review?

(1) Determine if the case is subject to review. When a reviewer identifies a case as not being subject to review, that case will be replaced to ensure the correct number of cases are reviewed each month.

A case is not subject to review when:

- (a) The assistance group (AG) is listed in error as being an active case;
- (b) The AG received SNAP in the review month because it was certified under disaster SNAP (D-SNAP) procedures;
- (c) The AG was in receipt of fair hearing benefits during the review month;
- (d) The AG has been referred for an intentional program violation (IPV) investigation and the investigation is scheduled to begin within five months of the case being selected, is under active fraud investigation or has a pending administrative or judicial IPV hearing;
- (e) All AG members have died or moved out of state;
- (f) All adult AG members have been hospitalized, incarcerated, or placed in an institution and are expected to remain there for one-hundred fifteen days after the end of the review month;
- (g) The AG did not participate in the review month. The AG is considered to have not participated in the review month if SNAP benefits were either not posted to the EBT system or the AG has not initiated activity that affects the balance of its account (such as a purchase or return), in a ninety-one-day period, which includes the review month. The ninety-one-day period may be any combination of months that must include the full review month, so long as they run consecutively for ninety-one or more days;



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- (h) The AG was not in the county the month the case was distributed for review.
- (2) Determine the full amount of the review month's benefits. This includes the monthly SNAP allotment, as well as any supplemental payment for the review month that was issued during or prior to it. The amount of supportive services provided through the SNAP employment and training program are excluded from the error calculation, but may be subject to overpayment if the assistance group (AG) is found to be ineligible as a result of the review.
- (3) Review the case record for documentation to support the determination of eligibility and benefit amount in the review month. This includes identifying the actions taken and that should have been taken between when the AG applied and the review month, and ensuring that:
 - (a) The case record includes a complete application for the most recent certification action (i.e., initial certification or recertification);
 - (b) Any changes reported by the AG (or that should have been reported by the AG) and any information known to the agency (including data matches and alerts) that were acted upon in accordance with rule 5101:4-7-01 of the Administrative Code; and
 - (c) All verifications required from the AG pursuant to rule 5101:4-2-09 of the Administrative Code, as well as the documentation of any supporting actions taken to make the determination of eligibility determination has to be able to readily determine at a minimum, the following from the case record:
 - (i) The type of each verification used (documentary, collateral contact, client statement or home visit), which eligibility factor it applied to, the time period(s) it applies to and which AG members it applies to;
 - (ii) That the best possible source of information was relied upon to make the eligibility determination and when the best source was not available, a justification for using an allowed alternative;
 - (iii) There is a clear and correct explanation about any calculations made by the eligibility worker (i.e., income conversion, averages, deductions, proration, budgeting, etc.); and



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(iv) The resolution of any conflicts across data sources are clearly explained.

(4) Determine if there is an error.

(a) When the case record can withstand third-party review and supports that the determination of eligibility and the benefit amount for the review month were determined in accordance with the rules in division 5101:4 of the Administrative Code, the case is correct.

(b) When the case record cannot withstand third-party review or is otherwise incomplete or conflicting with the determination of eligibility and benefit amount for the review month, the reviewer may:

(i) Attempt to complete verifications using information available to the county agency, including consulting with the eligibility worker who determined the AG's eligibility or benefit amount.

(ii) Request verification of the applicable eligibility factor(s), income source, and/or income deductions that had to have been provided by the AG pursuant to rule 5101:4-2-09 of the Administrative Code, by issuing a JFS 07105, "Verification Request Checklist" to the AG. The JFS 07105 will identify the specific documentation to be provided, the date on which it is to be returned, and allow the AG ten days to respond.

(c) Using the information included in the case record and any additional verifications or clarifications obtained through the review process, the reviewer will only use verified information to determine if there is an error.

(i) When a required eligibility factor cannot be verified, the reviewer is to assume the eligibility factor is not met. Generally speaking, the following has to be verified in accordance with rule 5101:4-2-09 of the Administrative Code to establish eligibility:

(a) AG gross income;

(b) Social security number for each AG member;

(c) Citizenship for each AG member;



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- (d) AG residency;
 - (e) Identity of the applicant;
 - (f) Physical or mental disability for an AG member claiming a student exemption for that reason;
 - (g) Income from an AG member who is a student;
 - (h) Able-bodied adult (ABA) work hours;
 - (i) ABA countable months in another state; and
 - (j) AG composition.
- (ii) When a verification for an income deduction cannot be verified, the reviewer will not consider the expense when calculating the amount of benefits an eligible AG was entitled to receive in the review month.
 - (iii) If the reviewer finds that the AG was not eligible in the review month, the case is not correct, and the error amount is equal to the benefit amount in the month of review.
 - (iv) If the reviewer finds that the AG was eligible, but based on the verified information, there was an overissuance (the AG received more than it was entitled to receive in the review month) or an underissuance (the AG received less than it was entitled to receive in the review month), the case is not correct and the error amount is equal to the overissuance or underissuance.
- (5) Determine which county agency is responsible for any case determined to be in error.
- (B) What is the process for a county payment error reviewer to certify the results of a review?
- A reviewer shall certify all of the following to be true when transmitting the results of a case review to ODJFS:
- (1) The review was performed consistently with the mandates of this rule;



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- (2) Based on the results of the review, there is information in the case record to support the determination of eligibility and benefit amount in the review month and the information can withstand the review of a third-party; and
- (3) If the case was found to be in error, that it was referred to county agency staff for review to determine appropriate action pursuant to the rules in Chapter 5101:4-8 of the Administrative Code.

(C) What if ODJFS returns a case review for further action?

When ODJFS returns a case to the county determined to be responsible for the error for further action, the county agency has two options:

- (1) Take the action(s) required by ODJFS to amend the results of the review and recertify the case to ODJFS; or
- (2) Request reconsideration of the case by the ODJFS state quality control reviewers. The finding from the state quality control is final and the case review will be updated accordingly.

(D) What are the timeframes associated with the county payment error review process?

- (1) Each month, ODJFS will provide the monthly sample of case numbers to a county agency by the fifth of the month. When the fifth of the month falls on a holiday or weekend, the cases will be provided by no later than the next business day following the holiday or weekend.
- (2) Each case review is to be completed and certified by the county agency no later than the end of business on the fifth of the second month following the month the case was provided. For example, cases made available by ODJFS on the fifth of March are to be certified by no later than the fifth of May. When the fifth of the month falls on a holiday or weekend, the cases will be due no later than the next business day following the holiday or weekend.
 - (a) In the event of a delay in the transmission of cases by ODJFS, the due date will be extended by the same amount of time.
 - (b) Cases not certified by the due date will be considered to be in error for the entire amount of SNAP benefits in the review month.
- (3) ODJFS will complete any secondary review by the last day of the month the review was due for certification to ODJFS. If a case is returned



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to a county agency pursuant to paragraph (C) of this rule, the county agency will have fourteen calendar days to make the requested change or request a review by state quality control staff.

- (4) State quality control staff have fourteen calendar days to make a final determination based on a request from a county agency.