

Family Assistance Letter #173 Early Issuance of SNAP Benefits

The information in this document is accurate at the time of issuance but may change based on additional guidance provided by the US Department of Agriculture (USDA).

Early Issuance

1. What is "early issuance"?

To ensure that there is adequate funding for recurring SNAP benefits in February, those benefits must be issued early and available to eligible assistance groups as a mass issuance on or before January 20, (as opposed to the normal staggered issuance date in February).

2. Which assistance groups are subject to early issuance? Will pending recertifications scheduled to close on January 31 be included?

Early issuance applies to all assistance groups that would have normally been included in the State's recurring monthly issuance file at the time of benefit issuance cutoff for February.

Assistance groups due to recertify or submit an Interim Report at the end of January may also be subject to early issuance if they have submitted their Interim Report or completed their recertification actions by the benefit issuance cutoff date for February.

Assistance groups that have not completed the required actions by benefit issuance cutoff will be processed as normal.

3. When is benefit issuance cutoff for February?

Under normal circumstances, benefit issuance cutoff would be January 22 and eligible assistance groups would have access to their SNAP benefits on their normal staggered availability date in February. However, under early issuance, the State must ensure that February benefits are made available to eligible assistance groups by no later than January 20. As a result, the benefit issuance cutoff for February 2019 is being changed to January 14.

4. By what date must adverse actions be taken?

Due to the change in the benefit issuance cutoff date for February, the adverse action date in Ohio Benefits is being changed to **January 14**. As a result of the change, negative actions taken on or after January 15 will not take effect until March 1. Therefore, it is critical that county agencies process as many recertifications, Interim Reports and changes as possible before 5pm on Monday, January 14.

UPDATE: Ohio Benefits will be available on Saturday, January 12 and Sunday, January 13 from 8AM to 6PM.

5. When will February SNAP benefits be available to eligible assistance groups?

Every assistance group determined eligible for February benefits prior to benefit issuance cutoff for February (January 14) is subject to early issuance and will have February benefits available on **January 16**.

For assistance groups certified (either as the result of a new application or recertification) after January 14, but **before** January 31, benefits will be made available at the time of certification.

6. If the federal shutdown ends prior to January 14, will the State proceed with early issuance?

Yes, even if the shutdown is resolved prior to January 14, 2019 the State will move forward with the early issuance as a result of FNS guidance.

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7. How will the February recurring benefit be distinguishable from the regular January benefit issued for the same month?

On the issuance detail record the early issuance benefits will show as available on 1/16/19 but as a February benefit.

8. How will early issuance affect quality control reviews?

FNS has advised the State that it is willing to consider holding State agencies that issue February benefits early harmless from Quality Control (QC) errors associated with an overissuance within limited parameters. Once the early issuance has been completed, FNS will revisit this issue with States and may issue further guidance depending upon the scope of the challenges.

9. How will early issuance affect SNAP recertifications due in January 2019?

The SNAP auto-discontinuance of cases that expire on January 31 will run on January 13 instead of the normally scheduled date, January 18. Assistance groups that complete the recertification process after January 13 will need to have the discontinuance rescinded, just as they would in any other month that the recertification process was completed after the auto-discontinuance batch.

Ongoing Case Processing

10. What should happen with applications after early issuance (1/16/19)?

FNS has stated that applications should continue to be processed under normal processing standards through January 30, 2019. If the shutdown is not resolved prior to January 31, 2019 additional guidance will be provided.

11. How will a county agency comply with a compliance resulting from a state hearing after February 1, 2019?

The State expects additional technical assistance from FNS in the coming days.

Communications

12. How will assistance groups be informed of the timing of their February benefits or that they won't receive benefits again until March (at the earliest)?

FNS has advised the State that recipients may be informed in the same manner they would be provided information about a mass change (e.g., news media, posters in certification offices, issuance locations, or other sites frequented by certified households, or general notices mailed to households).

At this time, ODJFS plans to communicate regarding the early issuance through social media, on the state interactive voice response (IVR) calling systems, the SNAP/TANF customer service line and a message on the Ohio Benefits Self Service tool. Additionally, the State is still working with the electronic benefit transfer (EBT) card vendor to determine if a message can be added to the Ohio Direction Card IVR and to determine if a separate notice can be provided to each family.

Clear and consistent communication will be key to ensuring the early issuance process goes smoothly. As soon as the message has been confirmed we will share it with the county agencies for use and continuity.

13. Will affected shareholders (grocers, foodbanks, retailers, etc.) be notified of the State's plan for early issuance?

The State will be sharing shutdown communications with the affected shareholders, including any final communication messages.

Funding

14. Are there administrative funds available for February?

There will be administrative funds available for February.