

Summer Electronic Benefits Transfer Application Elements Waiver

1. **State agency submitting waiver request and responsible State agency staff contact information:**

Ohio Department of Education
and Workforce,
Office of Nutrition
Brigette Hires, Administrator
25. S. Front St.
Columbus, OH 43215
614-425-9760
Brigette.Hires@education.ohio.gov

2. **Region:**

Midwest

3. **Eligible service providers participating in waiver and affirmation that they are in good standing:**

Ohio Department of Education and Workforce of whom is in good standing.

4. **Description of the challenge the State agency is seeking to solve, the goal of the waiver to improve services under the Program, and the expected outcomes if the waiver is granted. [Section 12(l)(2)(A)(iii) and 12(l)(2)(A)(iv) of the NSLA]:**

The Ohio Department of Education and Workforce is the partnering agency in the Summer Electronic Benefits Transfer (Summer EBT) program and oversees the statewide household application completion and submission process. The Summer EBT program regulations 7 CFR 292.12(c) requires states to develop a statewide student database with required elements “for the purposes of enrolling children for Summer EBT benefits and detecting and preventing duplicate benefit issuance”.

Households of which students participated during the summer operational period in a NSLP school but do not already have an individual eligibility determination have the opportunity to apply for Summer EBT. States are required to offer a statewide Summer EBT application for this purpose. Summer EBT regulations 292.13(i) have certain required fields for this application, yet Summer EBT regulations at 7 CFR 292.12(e) have different requirements for a household application to be considered complete at submission. The required household application submission elements are not in alignment with the requirements for the Summer EBT application and neither are in alignments with the required elements of the Summer EBT database.

5. **Specific Program requirements to be waived (include statutory and regulatory citations). [Section 12(l)(2)(A)(i) of the NSLA]:**

To facilitate enrolling children for Summer EBT benefits and detecting and preventing duplicate benefit issuance as required of states in 7 CFR 292.12(c), the DEW is requesting a waiver of 7 CFR 292.12(e) to include the following elements as required for an application to be considered complete in the Summer EBT application as to align with the Summer EBT database requirements at 7 CFR 292.12(c): date of birth, school and/or school district attended, and mailing address. Individual free or reduced price status is not requested as the application process will provide this information.

DEW is also requesting a waiver to 292.13(i) to include date of birth as a required field in the Summer EBT application.

6. Detailed description of alternative procedures and anticipated impact on Program operations, including technology, State systems, and monitoring:

The waiver will have minimal impact on the current application process. The waiver will exponentially increase the ability to confirm student enrollment, deduplicate student records to help ensure a child receives one benefit and comply with integrity expectations on states operating the Summer EBT program as compared to the ability to do so under the current regulation requirements.

7. Description of any steps the State has taken to address regulatory barriers at the State level. [Section 12(l)(2)(A)(ii) of the NSLA]:

There are currently no State level regulatory barriers related to this specific issue.

8. Anticipated challenges State or eligible service providers may face with the waiver implementation:

DEW does not anticipate challenges from the waiver. The added elements in the application will minimally increase the time to complete an application by the household. Rather, the waiver will increase the ability for DEW to match students applying for benefits within the database and issue benefits in a more timely manner while maintaining integrity of the program and the expected compliance to the regulations. The waiver will also decrease the administrative burden on DEW in attempting to have households reconsider submission of elements that are needed to provide the Summer EBT benefit.

9. Description of how the waiver will not increase the overall cost of the Program to the Federal Government. If there are anticipated increases, confirm that the costs will be paid from non-Federal funds. [Section 12(l)(1)(A)(iii) of the NSLA]:

The establishment of this waiver will not increase the overall cost of the Program to the Federal Government.

10. Anticipated waiver implementation date and time period:

Waiver implementation would start immediately and expire at the end of the 2025 summer operational period for Ohio which is August 15, 2025.

11. Proposed monitoring and review procedures:

State agency staff in the Office of Nutrition will monitor implementation of this waiver.

12. Proposed reporting requirements (include type of data and due date(s) to FNS):

DEW will adhere to all reporting requirements as prescribed by the USDA.

13. Link to or a copy of the public notice informing the public about the proposed waiver [Section 12(l)(1)(A)(ii) of the NSLA]:

<https://education.ohio.gov/Topics/Student-Supports/Food-and-Nutrition/Resources-and-Tools-for-Food-and-Nutrition/Food-and-Nutrition-Waivers>

14. Signature and title of requesting official:



Title: Administrator

Requesting official's email address for transmission of response:

Brigitte.Hires@education.ohio.gov

Phone: 614-466-0522

TO BE COMPLETED BY FNS REGIONAL OFFICE:

FNS Regional Offices are requested to ensure the questions have been adequately addressed by the State agency and formulate an opinion and justification for a response to the waiver request based on their knowledge, experience and work with the State.

Date request was received at Regional Office:

Date Received:.....

Check this box to confirm that the State agency has provided public notice in accordance with Section 12(l)(1)(A)(ii) of the NSLA

• Regional Office Analysis and Recommendations:

Recommend Approval

Recommend Denial

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- (2) fax: (202) 690-7442; or**
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