Ohio could do more to help hungry people
Waiver of time limits should be requested for all places that qualify

Policy Matters' Wendy Patton prepared the following statement for a press conference by Ohio Rep. Dan Ramos about lifting barriers to food access for hungry Ohioans.

In 2016, Ohio plans to waive time limits on federal food aid in 18 mostly rural counties where the economy lags and jobs are scarce. This is a good and compassionate policy choice. But thousands of other poor Ohioans are live in places that also qualify for waiver of time limits, and the state has failed to extend the waiver to them.

- The state excluded three counties and 12 cities that qualify for the waiver of time limits using the same methodology used to exempt the 18 counties in the request.
- Further, if the state used a slightly different approach, 34 out of Ohio's 88 counties and the same 12 cities would qualify.

We congratulate Representative Ramos and his colleagues who are working to expand federal food aid to all hungry people in Ohio.

Federal rules place time limits on food aid for adults who are not elderly, disabled or in custody of dependents to three out of every 36 months unless they can find enough work – about 20 hours per week – to meet the federal work requirements of the program. But the federal government waives the time limits where the economy lags. Ohio has pockets where the recovery never came. Here, people of all ages struggle to get consistent work and many are hungry. The federal rules make allowances for places like this, and Ohio should take advantage of the federal rules in all places that qualify – as Representative Ramos legislation would ensure.

Excluded cities: Twelve Ohio cities are eligible for the waiver under the same calculation methodology used by the state in identifying counties for the 2016 waiver request: Cleveland, Dayton, Lima, Lorain, Mansfield, Maple Heights, Middletown (the part in Butler County), Toledo, Trotwood, Zanesville, Youngstown and Warren (Table 1). These cities had unemployment rates at or above 120 percent of the national unemployment rate between January 2013 and December 2014, the threshold for the waiver and the months used by the state to calculate waiver eligibility.

Cities have been excluded for the past two years since Ohio rejected the statewide waiver. In 2014 and 2015, Ohio accepted the waiver for rural counties, and is requesting it again in the same rural areas, although more than 70 percent of those who lost their food aid because of this lived in urban counties. The exclusion of cities means many African-American, Asian and Hispanic Ohioans, who live mostly in cities, were subject to time limits on food aid. In the summer of 2014, Columbus Legal

Aid filed a civil complaint against Ohio based on the state's rejection of the waiver in cities, which disproportionately harmed minority populations.

Headed into 2016, the state could have redressed this inequity. The Kasich administration chose not to. We asked the Ohio Department of Job and Family Services why these places were not included in the waiver request. The response: "As with nearly all ODJFS programs, we manage SNAP by county, not by city or region." This answer implies that Ohio failed to request the waiver for cities because of administrative barriers. Federal rules allow the waiver in regions smaller than the administrative boundary. A state may request a waiver for counties, sub-county areas (cities, towns or even zip codes) or multiple-county regions. Some states don't because of worries about increased errors, inadequate computer systems or confusion about the jurisdiction of every address. But many states do waive eligible cities: Rochester, NY; Knoxville, TN; St. Louis, MO; South Bend, IN; Green Bay, WI and Providence, RI.

Administrative barriers are manageable in Ohio. Concern about properly identifying whether a SNAP participant lives in a waived area can be addressed. Residence is listed by zip code in the state's eligibility information technology, allowing a city-level designation. It might take some reprogramming of the information technology system or caseworkers might have to sometimes override the system manually. This could take some resources, but the state has resources. The recently approved state budget gave away more than $2 billion dollars in tax cuts and locked up a half billion dollars in savings. There are funds, should the legislators choose, to ensure hungry Ohioans – and the families they invariably live with – receive food aid. And of course, the resources to pay for the aid itself come entirely from the federal government.

Excluded counties: Vinton, Trumbull and Muskingum Counties were excluded from the waiver request although they qualify for the exemption. The threshold for eligibility is 120 percent of the national unemployment rate over the 24-month period of January 2013 to December 2014, calculated to the tenth of a percent or one decimal point. This means places with rates of 8.1 percent would qualify. Trumbull and Muskingum each had rates that round to 8.1 percent – Muskingum's was 8.12 percent and Trumbull's was 8.09 percent. So, under federal rules, Trumbull and Muskingum are both eligible using the state's calculation. Vinton County had a 24-month unemployment average of 9.3 percent, clearly higher than 120 percent of the national average. Asked why Vinton County was not included, the response from the Ohio Department of Job and Family Services Office of Communications was: "Vinton, Ross and Hocking counties merged their departments of job and family services into one administrative entity serving residents of all three counties." This is an administrative barrier not linked to federal prohibitions. Indeed, if the state took a more regional approach (as allowed by federal rules), not only Vinton County but also Hocking and Ross would be eligible for the waiver.

By grouping counties and using a regional tally of unemployment, federal food aid could be further maximized. This is allowed under federal rules. Up to 34 counties and 10 cities would be eligible if grouped as allowed under federal rules (Table 2). This includes almost all Appalachian counties and many cities.

Table 1	
Cities eligible for a waiver of food stamp time limits because of 24-month history of weak economies	
Eligible cities (24-month unemployment was 120% of national average or higher)	**Average unemployment Jan. 2013 – Dec. 2014**
Portsmouth, OH MSA*	10.3
Youngstown city, OH	**9.8**
Warren city, OH	**9.6**
Jackson, OH MSA*	9.5
Weirton-Steubenville, WV-OH MSA, OH part*	9.4
Lorain city, OH	**9.2**
Zanesville city, OH	**9.2**
Norwalk, OH MSA*	**9.1**
Wilmington, OH MSA*	9.0
Maple Heights city, OH	**8.9**
Trotwood city, OH	**8.7**
Point Pleasant, WV-OH MSA, OH part*	8.6
Port Clinton, OH MSA*	8.6
Cleveland city, OH	**8.5**
Coshocton, OH MSA*	8.5
Dayton city, OH	**8.4**
Lima city, OH	**8.4**
Ashtabula, OH MSA*	8.3
Mansfield city, OH	**8.2**
Toledo city, OH	**8.2**
Middletown city, Butler County part, OH	**8.1**
120% of national unemployment	**8.1**

Sources: Policy Matters Ohio based on analysis by the Center on Budget and Policy Priorities of BLS data (http://www.bls.gov/lau/). Note that many of these cities are in counties that also qualify for a waiver of SNAP time limits.

Notes: * Designates cities in counties the Governor has recommended for waiver.
Cities in bold are eligible, but no waiver was requested.

Table 2

Counties and cities where waiver of time limits for food aid should be sought for 2016

Minimum number of jurisdictions eligible for waiver			Maximum number of jurisdictions eligible for waiver		
	Counties Eligible for a Waiver Based on Unemployment Rates	Unemployment, Jan2013 - Dec2014		Grouping of Counties Eligible for a Waiver Based on Combined Unemployment	Unemployment, Jan2013 - Dec2014
1	Adams County, OH	10.9	1	Adams County, OH	10.9
2	Pike County, OH	10.6	2	Pike County, OH	10.6
3	Monroe County, OH	10.5	3	Monroe County, OH	10.5
4	Meigs County, OH	10.4	4	Meigs County, OH	10.4
5	Scioto County, OH	10.3	5	Scioto County, OH	10.3
6	Jackson County, OH	9.5	6	Jackson County, OH	9.5
7	Jefferson County, OH	9.4	7	Jefferson County, OH	9.4
8	Vinton County, OH	9.3	8	Vinton County, OH	9.3
9	Huron County, OH	9.1	9	Clinton County, OH	9.0
10	Clinton County, OH	9.0	10	Highland County, OH	9.0
11	Highland County, OH	9.0	11	Morgan County, OH	9.0
12	Morgan County, OH	9.0	12	Brown County, OH	8.6
13	Brown County, OH	8.6	13	Gallia County, OH	8.6
14	Gallia County, OH	8.6	14	Noble County, OH	8.6
15	Noble County, OH	8.6	15	Coshocton County, OH	8.5
16	Ottawa County, OH	8.6	16	Perry County, OH	8.4
17	Coshocton County, OH	8.5	17	Ashtabula County, OH	8.3
18	Perry County, OH	8.4	18	Muskingum County, OH	8.1
19	Ashtabula County, OH	8.3	19	Trumbull County, OH	8.1
20	Muskingum County, OH	8.1	20	Athens County, OH	7.9
21	Trumbull County, OH	8.1	21	Guernsey County, OH	7.6
	Note: each county's unemployment is 20% over national average		22	Lawrence County, OH	7.6
	Cities Eligible for a Waiver		23	Mahoning County, OH	7.5
1	Cleveland city, OH	8.5	24	Ross County, OH	7.5
2	Dayton city, OH	8.4	25	Belmont County, OH	7.4
3	Lima city, OH	8.4	26	Columbiana County, OH	7.3
4	Lorain city, OH	9.2	27	Washington County, OH	7.3
5	Mansfield city, OH	8.2	28	Hocking County, OH	7.2
6	Maple Heights city, OH	8.9	29	Carroll County, OH	6.9
7	Middletown city, Butler County	8.1	30	Harrison County, OH	6.9
8	Toledo city, OH	8.2	31	Fayette County, OH	6.6
9	Trotwood city, OH	8.7		**Total for Appalachian region**	**8.2**
10	Zanesville city, OH	9.2		*Note: regional total unemployment 20% over national average*	
11	Youngstown	9.8		**Grouping of Northern Counties**	
12	Warren	9.6	32	Huron County, OH	9.1
	Note: each city's unemployment is 20% over national average	**8.1**	33	Crawford County, OH	7.8
	National average unemployment rate	**6.8**	34	Morrow County, OH	6.8
	20 percent above national average	**8.1**		**Total for north central region**	**8.1**

Source: Policy Matters Ohio, based on Center on Budget and Policy Priorities analysis of Census data. Note that in earlier versions Youngstown and Warren were mistakenly omitted because they are located in counties that could also be eligible; that omission has been corrected here.