

**Ohio Department of Job and Family Services
Bureau of State Hearings**

State Hearing Decision

<u>Appeal</u>	<u>Program</u>	<u>Disposition</u>	<u>Compliance</u>
4028066	FA	OVR	Not Required

Request Date: 01/29/2026

Hearing Date: 03/02/2026

Mail Date: 03/06/2026

Hearing Officer: Stefanie Brown

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Issue

Appeal # 4028066 – Supplemental Nutrition Assistance Program (SNAP):

Did the County Department of Job and Family Services (CDJFS) correctly terminate SNAP benefits, by notice dated January 21, 2026?

After careful consideration of the information presented during this state hearing, the determination was supported by regulation.

Procedural Matters

The hearing was requested on January 29, 2026 (exhibit 1). The CDJFS uploaded appeal documentation to the electronic record on February 11 and 13, 2026 (exhibit A & B). The hearing was scheduled for February 17, 2026, rescheduled and conducted on March 2, 2026. The Appellant participated in the hearing. The CDJFS was represented by A. Phillips. All parties were sworn in.

Findings of Fact

1. The assistance group consisted of five: the Appellant (age 53), her spouse (age 47) and three grandchildren (ages 12, 9 and 4 months).
2. The children received Ohio Works First (OWF) cash assistance and the household received SNAP benefits.
3. In November 2025, the Appellant reported moving to a new county and the addition of the youngest child. The case was transferred to the current CDJFS.
4. The CDJFS added the youngest child and the OWF benefit increased to \$640 per month.
5. On December 8, 2025, the CDJFS issued a verification request for shelter expenses for the new residence, income for the Appellant's spouse, and verification of the spouse's child support.
6. On or about January 9, 2026, the CDJFS issued a second verification request for marriage verification, the Appellant's spouse's income and child support documentation.
7. On January 12, 2026, the CDJFS received paycheck stubs.
8. The Appellant's spouse was employed. The CDJFS received the following gross pays: December 5th \$1,505; December 12th \$1,327; December 19th \$1,176; and December 26th \$1,094. The CDJFS averaged the four pays to \$1,275 weekly (\$5,102/4). This was converted to \$5,482 per month (\$1,275 x 4.3)
9. The CDJFS ended the child support payment expense, as it was verified the Appellant's child support order was fulfilled and complete (exhibit A, pp. 28-37).

10. The CDJFS verified the following expenses: \$1,800 rent, 20% earned income deduction and \$261 standard deduction. The CDJFS gave the Appellant credit for paying utilities and the maximum credit of \$766 was allowed.
11. On January 20, 2026, the CDJFS updated the case and found the household to be over income for SNAP benefits. Notice of termination was issued on January 21, 2026. Termination was to be effective on February 28, 2026.

Conclusion of Policy & Analysis

Policy

SNAP is a program designed to promote general welfare and to safeguard the health and well-being of the nation's population by raising the levels of nutrition among low-income households. Participation in SNAP shall be limited to those assistance groups whose incomes are determined to be a substantial limiting factor in permitting them to obtain a more nutritious diet. *[Ohio Admin. Code § 5101:4-1-03; 5101:4-4-31 & 7 C.F.R. § 271.1]*

An assistance group is composed of one of the following individuals or groups of individuals . . . Spouses: a person living with his or her spouse, as defined in rule 5101:4-1-03 of the Administrative Code, shall be considered as customarily purchasing food and preparing meals together, even when they do not do so. . . Person under parental control: persons under eighteen years of age and unmarried living with and are under the parental control of another household member who is not their natural, adoptive, or step parent shall be treated as customarily purchasing and preparing meals together for home consumption even when they do not do so. Note: "parental control" refers to unmarried minors who are dependents-financial or otherwise-of another household member as opposed to independent units. *[Ohio Admin. Code § 5101:4-2-03 & 7 C.F.R. § 273.1]*

"Assistance group income" shall mean all countable income from whatever source as defined in rule 5101:4-4-19 of the Administrative Code. *[Ohio Admin. Code § 5101:4-4-11 & 7 C.F.R. § 273.9]*

To determine the assistance group's eligibility and monthly benefit, the county agency shall consider the income already received by the assistance group during the certification period and any anticipated income the assistance group and the county agency are reasonably certain will be received during the remainder of the certification period. Income received during the past thirty days shall be used as an indicator of the income that is and will be available to the assistance group during the certification period. . . . weekly income must be converted to a monthly figure by multiplying by 4.3. *[Ohio Admin. Code § 5101:4-4-31 (A, B & H); 5101:4-4-27 & 7 C.F.R. § 273.9]*

Earned income includes all wages and salaries of an employee including:

- (a) Garnished or diverted payments from wages; and
- (b) The gross amount of sick pay, without any deductions for taxes and other work expenses, when the payee is a current employee of the payer. . .

Unearned income includes OWF benefits. *[Ohio Admin. Code § 5101:4-4-19 (B); (C) & 7 CFR § 273.9]*

An assistance group with gross income at or below two hundred percent of the federal poverty level (FPL) according to their assistance group size that is provided a notice and a text message with a link that includes information about Ohio careline services and how to access those services is categorically eligible for SNAP. . . What eligibility factors are waived for assistance groups determined categorically eligible?

- (1) SNAP one hundred thirty percent gross income limit;
- (2) Net income limit; and
- (3) Resource limit. *[Ohio Admin Code § 5101:4-2-02 & 7 CFR § 273.2]*

The income eligibility standards for SNAP are issued through a food assistance change transmittal, which can be found in the food assistance certification handbook at the Ohio Department of Job and Family services website. The standards are adjusted annually on October first. For a household of five, the 200% FPL standard was \$6,275 as of October 1, 2025. The 130% standard was \$4,079 per month, as of October 1, 2025. *[Ohio Admin. Code § 5101:4-4-11; Food Assistance Change Transmittal No. 105 & 7 CFR § 273.9]*

In calculating the SNAP monthly allotment, the allowable deductions include: twenty percent of the gross earnings from employment, the standard deduction for the assistance group size (\$261 for five), certain verified medical expenses in excess of \$35 for elderly or disabled assistance group members, child support paid for a child outside the assistance group, verified dependent care expenses necessary to allow an assistance group member to attend an acceptable work and training activity, and those shelter expenses remaining after deducting half the adjusted income. Allowable expenses used in calculating an individual's shelter costs include rent, mortgage, property tax, and property insurance payments. To that, the Agency adds the appropriate utility allowance for those individuals who are billed separately for utility costs. All shelter and utility expenses must be verified. The maximum utility credit was \$766 per month, regardless of how much is billed or paid for utilities. *[Ohio Admin Code § 5101:4-4-31; 5101:4-4-23 (I); Food Assistance Change Transmittal No. 105; 7 CFR § 273.9 & 7 CFR § 273.10]*

When the assistance group is categorically eligible according to rule 5101:4-2-02 of the Administrative Code and thus not subject to the net monthly income standard, multiply the net monthly income by thirty per cent, rounded up to the next whole dollar. This is subtracted from the maximum SNAP allotment an assistance group can receive based on assistance group size. Assistance groups containing three or more members shall receive the actual calculated allotment. The maximum allotment for a household of five was \$1,183. [Ohio Admin. Code § 5101:4-4-27; 5101:4-4-39; Food Assistance Change Transmittal No. 105 & 7 CFR § 273.10]

The Hearing Officer's findings of fact must be based exclusively on the evidence introduced at the hearing. The rule further states that the Agency is responsible for showing, by a preponderance of the evidence, that its action or inaction was in accordance with department rules. [Ohio Admin. Code § 5101:6-7-01 & 7 C.F.R. § 273.15]

Analysis

Here, the CDJFS testified that it determined the household to be over income for SNAP. The CDJFS found the Appellant's spouse's gross earnings to be \$5,482 monthly (see finding of fact # 8) and the OWF to be \$640. The household's total gross income was \$6,122 (\$5,482 + \$640). The CDJFS waived the household from the gross income test (130%) of \$4,079 per month and considered the household's expenses to determine whether they would qualify. The CDJFS explained after the deductions, the remaining income did not qualify the household for benefits. The CDJFS determined eligibility, per Ohio Administrative Code § 5101:4-4-23 through 5101:4-4-39:

\$5,482 gross earned income - \$1,096.40 (20% earned income deduction) + \$640 OWF - \$261 standard deduction = \$4,764 adjusted income

\$1,800 shelter expense + \$766 max utility credit = \$2,566 total shelter expense - \$2,382 (50% of \$4,764 adjusted income) = \$184 excess shelter deduction

\$4,764 net adjusted income - \$184 excess shelter deduction = \$4,580 net adjusted income

\$1,183 maximum allotment - \$1,374 (30% of \$4,580 net adjusted income) = \$0 monthly allotment

The Appellant did not dispute the gross income or expenses used. She explained she also had two car notes and other monthly living expenses. Car notes are not allowed per Ohio Administrative Code § 5101:4-4-23. CDJFS afforded the household the maximum utility credit. She explained that she needed the SNAP to help provide for her grandchildren. She reported that her spouse's hours have since decreased.

Ohio Administrative Code § 5101:4-2-03 requires the Appellant, her spouse, and the three minor grandchildren to be considered one household/assistance group for SNAP purposes. The children cannot receive SNAP separately from the Appellant as they are under her “parental control.” Ohio Administrative Code § 5101:4-4-27 & 5101:4-4-31 provides the CDJFS must determine the income and eligibility based on the verified income, allowable deductions and the formula for eligibility, as outlined. The CDJFS correctly completed the process and found the Appellant did not qualify for a monthly SNAP benefit.

During state hearing, the CDJFS has burden to show that the determination was in accordance with the applicable regulation per Ohio Administrative Code § 5101:6-7-01. After a review of the evidence and regulations, the SNAP termination was correct because the household did not qualify for a monthly benefit based on the monthly adjusted income. The appeal should be overruled. The Appellant may reapply for SNAP at any time.

Hearing Officer’s Recommendation

Appeal # 4028066 – SNAP: OVERRULED

Based on the record and policy before me, I recommend appeal number 4028066 be OVERRULED.

Final Administrative Decision and Order

Regarding appeal number 4028066, I find the Hearing Officer’s decision to be supported by the evidence and regulations. The recommendations above are adopted, and the appeal is OVERRULED.

Adam Dettra

03/06/2026

Notice to Appellant

This is the official decision of your state hearing. It informs you of the decision and order in your case. Papers and materials introduced at the hearing, known as "exhibits," make up the hearing record. The hearing record is maintained by the Ohio Department of Job and Family Services. If you would like a copy of the official record, please call the ODJFS hotline at 1-866-635-3748.

Important Notice: If you disagree with this decision, you, or your authorized representative, may request an administrative appeal about this notice. Contact us using one of the following methods:

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Appendix

Appellant Exhibits

1. Request-SH (1 page)

Agency Exhibits

- A. Appeal Summary 1 (77 pages)
- B. Appeal Summary 2 (79 pages)

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