

Information Memorandum Transmittal Office of Self-Sufficiency Programs



Heather Miles, SSP Program Manager

Authorized signature

Number: SS-IM-21-025

Issue date: 12/20/2021

Topic: SNAP, TANF and Employment Related Day Care

Due date: 12/20/2021

Subject: 185% to 200% FPL Changes in BBCE, JPI and ERDC

Applies to (check all that apply):

- | | |
|--|--|
| <input type="checkbox"/> All DHS employees | <input type="checkbox"/> County Mental Health Directors |
| <input checked="" type="checkbox"/> Area Agencies on Aging: Type B | <input type="checkbox"/> Health Services |
| <input checked="" type="checkbox"/> Aging and People with Disabilities | <input type="checkbox"/> Office of Developmental Disabilities Services (ODDS) |
| <input checked="" type="checkbox"/> Self Sufficiency Programs | <input type="checkbox"/> ODDS Children's Intensive In Home Services |
| <input type="checkbox"/> County DD program managers | <input type="checkbox"/> Stabilization and Crisis Unit (SACU) |
| <input type="checkbox"/> Support Service Brokerage Directors | <input checked="" type="checkbox"/> Other (<i>please specify</i>): Direct Pay Unit |
| <input type="checkbox"/> ODDS Children's Residential Services | |
| <input type="checkbox"/> Child Welfare Programs | |

SNAP:

Requests for SNAP in Oregon will be screened for Broad Based Categorical Eligibility (BBCE) using 200% Federal Poverty Level (FPL), instead of the 185% FPL currently being used, starting with January 2022 benefits. This will align Oregon with 19 other states who already use 200% FPL to confer BBCE.

This screening will be done automatically by the ONE system and workers will not be required to take any new actions.

The ONE system allows staff to better understand categorical eligibility by displaying the different categories a household may fall into: Categorical Eligibility (CE), Expanded Categorical Eligibility (ECE) and Broad Based Categorical Eligibility (BBCE).

What is the benefit of using 200%FPL to confer Broad Based Categorical Eligibility (BBCE)?

By increasing the FPL used to screen for BBCE, an increased number of households will be eligible for food benefits by eliminating the federal asset test in the SNAP program. This change will impact households who struggle with hunger despite having modest savings and income below the 200% FPL. An analysis conducted in 2019 showed that at least 17,000 households would become eligible for SNAP based on this change.

Categorical eligibility granted through BBCE streamlines the application process and increases access to SNAP by Oregonians recovering from the pandemic. In addition, access to SNAP signifies these households may also access other benefits such as free or reduced school lunches, energy assistance and other programs.

Where can I find more information?

Effective January 1, 2022, the new 200% FPL will be reflected in the Oregon Programs Eligibility Notebook ([OPEN](#)) and MSC [5530](#), DHS [9213](#) and DHS [9221](#) (retrieve latest version from the [forms server](#)) and the revised categorical eligibility rule ([OAR 461-135-0505](#)). In addition, the [FS Calculator](#), and the [FS Benefits Estimator](#) will be updated with the new figures.

Forms will be available online in English by January 1, 2022 and translated versions will be posted as received from translation services. Paper copies may be requested from Publishing & Distribution as needed.

Because this is considered a mass change, no decision notice will be sent. A media release will be distributed to publicize this change per Oregon Administrative Rule (OAR) [461-175-0250\(2\)](#) and federal regulations.

Jobs Participation Incentive (JPI):

Effective January 1, 2022, JPI, which is a TANF program will be aligning with SNAP to increase the maximum income limit for financial eligibility from 185% FPL to 200% FPL. As a reminder in order to be eligible for JPI the following must be true:

- Be a single parent of a dependent child under six years of age and working at an unsubsidized paid employment for an average of at least 20 weekly hours.
- Be a single parent of a dependent child at least six years of age and under 18 years of age and working at an unsubsidized paid employment for an average of at least 30 weekly hours.
- Be a parent in a two-parent household that does not receive federally-funded child care assistance, and the parents are working at unsubsidized paid employment for a combined average of at least 35 hours per week.

- Be a parent in a two-parent household that receives federally-funded child care assistance, and the parents are working at unsubsidized paid employment for a combined average of 55 hours per week.
- Be an eligible adult in a SNAP benefit group and the parent of an eligible dependent child under age 18 in the same SNAP benefit group.
- Not be receiving any State Family Pre SSI/SSDI (SFPSS) or Temporary Assistance to Needy Families (TANF) program benefits in the same month.

In order for JPI to be approved, the department must verify two consecutive weeks of work hours. The ONE system will use the new increased 200% FPL when determining JPI eligibility once the worker enters the verified JPI hours for week 1 and 2.

Reference OAR [461-135-1260](#) for JPI eligibility.

Employment Related Day Care (ERDC):

Effective for benefits with a Date of Request (DOR) of January 1, 2022, the **initial** income limit for the ERDC program will increase from 185% to 200% FPL to align with the SNAP program and to allow more families to qualify for ERDC. This means **new** families applying for ERDC after January 1, 2022 will now qualify if the family’s income is at or below 200% FPL. Families who were previously denied for being over income and are under 200% FPL may reapply for benefits after January 1, 2022. There is no change to the ongoing and exit income limits of 250% FPL or 85% State Median Income (SMI) depending on family size, which can be found on the [combined standards form](#) as well as on the [ODHS child care assistance website](#).

ONE Guidance:

Families who apply with a DOR prior to January 1, 2022 who are denied due to their income being above 185% FPL but at or below 200% FPL should be asked if they would like to change their DOR to January. Eligibility should be re-processed for a full 12-month certification beginning in January.

| Eligibility Determination Group (EDG) size | New Initial Income Limit (200% FPL) |
|---|--|
| 2 | \$2,904 |
| 3 | \$3,660 |
| 4 | \$4,417 |
| 5 | \$5,174 |
| 6 | \$5,930 |
| 7 | \$6,687 |
| 8+ | \$7,444 |

The change will be updated in the Oregon Programs Eligibility Notebook ([OPEN](#)), MSC [5530](#) (combined standards), [Child Care Assistance](#) and in OAR [461-160-0300](#).

Please contact Child Care Policy with questions.

If you have any questions about this information, contact:

| | |
|---|------|
| Contact(s): SNAP Policy, TANF Policy and Child Care Policy | |
| Phone: | Fax: |
| Email: Snap.Policy@dhsosha.state.or.us Tanf.Policy@dhsosha.state.or.us Childcare.Policy@dhsosha.state.or.us | |