October 9, 2025

Food Assistance Change Transmittal No. 106

TO: All Food Assistance Manual Holders
FROM: Matt Damschroder, Director
SUBJECT: **Changes due to the One Big Beautiful Bill Act of 2025**.

Background

On July 4, 2025 the One Big Beautiful Bill of 2025 (H.R.1) was signed into law. This federal law amended provisions of the Food and Nutrition Act of 2008, thus amending 7 U.S.C. 2015(f), changing which non-citizen aliens qualify for Supplemental Nutrition Assistance Program (SNAP) benefits.

Federal Law Changes

Effective July 4, 2025, the following groups of non-citizens ***remain or are newly eligible*** for SNAP (as long as they are otherwise eligible for SNAP):

- U.S. non-citizen national
- Lawful Permanent Residents (LPRs), subject to the existing five-year bar
- Cuban and Haitian entrants
- Compact of Free Association (COFA) migrants from the Marshall Islands, Micronesia, and Palau who are lawfully residing in the U.S. (*newly* eligible status)

Effective July 4, 2025, the following groups of non-citizens ***are not eligible*** for SNAP unless they are also in one of the eligible non-citizen groups identified above:

- Asylees
- Refugees
- Parolees
- Individuals whose deportation has been withheld
- Aliens granted conditional entry
- American Indians born in Canada
- Hmong or Highland Laotian Tribe members
- Individuals qualified under urgent humanitarian reasons (e.g., survivors of trafficking or domestic violence)
- Amerasians
- Lawful aliens with a military connection

No changes were made to eligibility for citizens of the United States.

Ohio Benefits Implementation

Phase 1:

ODJFS Actions

Ohio Benefits (OB) programming cannot be updated to align with this new law until January. In order to prevent overpayments and to ensure compliance with federal law on November 1, ODJFS will ensure the following occurs**:**

- By adverse action in October 2025, identify individuals who have an alien status that is no longer eligible as of November 1; and effective October 31, 2025, will either terminate the benefit or reduce the benefit for the remaining assistance group members.
- A journal note will be added to the case explaining why the individual is no longer eligible.
- Eligibility for the assistance group will be updated.
- Every impacted assistance group will be noticed of the action.

At this time, these non-citizen eligibility changes only impact SNAP and an individual may remain eligible for other programs like Medicaid or child care. In order to ensure those benefits are not impacted, citizenship status will be temporarily switched to "citizenship not verified" prior to their case being updated, which will ensure that SNAP benefits for these individuals will end on October 31, 2025. Once the case update is complete, they will be switched back to their official alien status to maintain their eligibility for the other programs. Thus, if you later make changes to their SNAP case or run EDBC for SNAP between November 1 and **January 26, 2026**, Ohio Benefits might mistakenly make them eligible for SNAP again, making an override necessary.

Caseworker Responsibilities in Ohio Benefits on November 1, 2025:

In the event workers are reviewing a case that requires an EDBC run for an ineligible non-citizen, please complete the following:

Intakes/Recertification/Changes for **multi-member AGs**

1. Upon running EDBC, select 'Override Program Configuration' and update the following areas for the impacted individual:
    a. Person Status: FRE-Active
    b. Status Reason: Failed Citizenship Verification
2. A pro rata share of the ineligible member's income and expenses shall be counted to the remaining eligible members in the household. If this applies, workers shall complete a budget worksheet. After overriding the Program Configuration, they will also select 'Override Allotment.'

3. Update the journal notes to describe the reason for overriding the SNAP budget.

Intakes/Recertification for **single AGs**

1. Override the Program Configuration. To ensure the appropriate notice is generated, update the following areas:
    a. Program Status: Denied
    b. Program Status Reason: No Eligible Members
    c. Person Status: MEM-Denied
    d. Status Reason: Failed Citizenship Verification

There was no change to eligibility for Lawful Permanent Residents or Cuban/Haitian entrants and Ohio Benefits will continue to correctly determine eligibility. For COFA individuals, caseworkers will need to complete an override to make them eligible until January 26, 2026.

Phase 2:

- Ohio Benefits will correctly apply the changes in citizenship eligibility as of January 26, 2026, including for COFA individuals.
- Relevant Ohio Administrative Code rules (5101:4-3-06 and 5101:4-3-07) will be updated and filed with a February 1, 2026 effective date.

Questions?

Please contact Program Policy & Systems at OFA-PPS@jfs.ohio.gov

For OB processing questions, please contact the Help Desk at OB-IMS_HELPDESK@jfs.ohio.gov