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Public Interest Report

To the Governor, General Assembly, Department Directors, and Ohio Congressional Delegation:

In partnership with the federal government, Ohio offers its citizens many opportunities for support through the public benefit program. Each program has a defined set of rules and regulations, but a common requirement for each public benefit program is that the recipient is a U.S. citizen, lawful permanent resident of the U.S., or “qualified alien” to receive benefits.

The U.S. Department of Homeland Security, U.S. Citizenship and Immigration Services, Verification Division (DHS) administers the Systematic Alien Verification for Entitlements (SAVE) program. The SAVE program can be used to assist federal, state, and local governments in identifying citizenship and immigration status of benefit applicants, when relevant, for the purpose of administering benefit programs. While some programs require the state or local agency to use the SAVE program, it is not a required tool for all public benefit programs but would be a best practice when programs require citizenship verification.

Pursuant to Ohio Rev. Code § 117.11, we conducted this audit in the public interest to examine an agency’s process to determine whether recipients of certain public benefit programs met the citizenship and immigration status eligibility criteria. For purposes of this audit, we included the following Ohio public benefit programs, administered by the noted agencies:

- Medicaid, Ohio Department of Medicaid (ODM)¹
- Supplemental Nutrition Assistance Program (SNAP), Ohio Department of Job and Family Services (ODJFS)
- Temporary Assistance for Needy Families (TANF), specifically Ohio Works First (OWF), ODJFS
- Low Income Home Energy Assistance Program (LHEAP), Ohio Department of Development²
- Publicly Funded Child Care (PFCC), Ohio Department of Children and Youth
- Unemployment Insurance (UI), ODJFS
- Housing Choice Vouchers (HCV), local Metropolitan Housing Authorities (MHAs)³

After evaluating the sample populations tested for each of the above noted programs, the audit found the SNAP, LHEAP, PFCC, and UI recipient sample populations had no identified exceptions in our limited testing. However, the audit also found issues with ten percent of recipients tested in Medicaid and three percent of recipients tested in the OWF sample populations. The state agency either: (1) did not

¹ Medicaid coverage for certain individuals (such as emergency medical services) is not required to verify U.S. citizenship or immigration status; therefore, individuals who received solely emergency medical services paid by Medicaid were not included in this audit.

² Effective April 6, 2026, this program is administered by the ODJFS. 136th General Assembly - House Bill 96.

³ We requested recipient information from the 69 of 71 MHAs in Ohio that administer the HCV program at the start of this audit, but we have not received recipient information from all 69 MHAs. This report may be supplemented at a later date to include HCV recipients.

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correctly evaluate the information on required immigration documentation it otherwise properly gathered and examined; (2) did not maintain in the recipient files the documentation relied upon by the agency to determine eligibility based on citizenship and immigration status; or (3) improperly reported a recipient as being paid under the agency's program. Additional details regarding the audit and recommendations are included in the Supplement to the Public Interest Report and Appendix A.

The Working Families Tax Cut Act, signed into law on July 4, 2025, further restricts eligibility for the Medicaid public benefit program as it relates to citizenship and immigration status. Effective October 1, 2026, we estimate ODM will need to review approximately 111,000 Medicaid beneficiaries to maintain compliance with the eligibility requirements established by the Act.

The audit found some of the state's overall data quality to be strong; however, opportunities remain to tighten controls, particularly in Medicaid. In large public benefit programs, even minor control improvements can prevent significant loss of public funds. This report provides policymakers with expenditure details alongside data, participant insights, and anomalies within multi-program participation. Additional details regarding the audit and recommendations are included in the Supplement to the Public Interest Report and Appendix A.

Overall, the state is well-positioned to execute swift corrective action and rectify identified control weaknesses and baseline data issues without delay, leveraging its existing framework to streamline cross-program integration.

This audit was limited to the scope and approach detailed below and should not be used for any other purpose.

KEITH FABER
Ohio Auditor of State



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Chief Deputy Auditor

August 17, 2026

Supplement to the Public Interest Report

Background – How Ohio Determines Compliance

Individuals must meet a series of requirements to be determined eligible for public benefit programs in Ohio. One requirement of eligibility for most programs is the individual must be a U.S. citizen, lawful permanent resident of the U.S., or “qualified alien” to receive benefits. Across programs, evaluation of citizenship and immigration status eligibility generally follow similar verification processes. An applicant completes the appropriate application and indicates their citizenship status. For applicants who indicate a status as a U.S. citizen, the state agency may run verification against electronic databases, such as the Social Security Administration (SSA) database, to verify the information submitted by the applicant. If the information is not verified, discrepancies exist, or the result otherwise raises a question of whether the information is sufficient to demonstrate citizenship, then further documentation must be provided by the applicant, as appropriate per the program guidelines, to verify citizenship eligibility status.

For applicants who indicate a status as qualified aliens, the verification process differs slightly by program, usually in the degree of documentation that is required upfront by an applicant before electronic verification is completed using the SAVE program. For all the tested programs, a qualified alien must provide the agency with either (1) information sufficient for the agency to electronically verify qualified alien status; or (2) detailed immigration documentation (e.g., I-94, I-776, and I-551 forms) as part of the initial application. Using the information or documents obtained from the applicant, the agency will review the results of the electronic verification based on the information or compare the documentation against the results obtained from a search of the SAVE program.

The SAVE program is a tool required to be used by some agencies to confirm an applicant’s representation of their citizenship and immigration status. The SAVE program cross matches identifiers from various federal databases and returns results that show whether the person’s identifiers are found in other databases. Results can identify someone as a U.S. citizen, lawful permanent resident, deceased, or in a particular immigration status category (see [SAVE guide](#)). If the person’s identifiers cannot be found, the returned result will indicate a defect or missing information. The program’s results cannot be relied upon alone to disqualify an applicant. In other words, if the information or documentation from the applicant is corroborated through a SAVE search, no further action is required for this aspect of program eligibility. However, if the SAVE program result category is inconclusive or does not corroborate what was presented by the applicant, the agency must take additional steps, such as requesting detailed immigration documentation from the applicant to further verify qualified alien status. For all programs, the applicant is afforded additional opportunities to verify qualified alien status when the primary, and sometimes secondary, verification steps are inconclusive. Once verification occurs, the applicant is notified of the eligibility determination made.

Scope and Approach

The primary objective of the audit was to determine whether the administering state agency examined and maintained proper documentation of citizenship and immigration status for individuals enrolled in a public benefit program during November 2025. We entered a Memorandum of Agreement with DHS to use the SAVE program as part of the audit to compare SAVE program results against the documentation maintained in the agency’s recipient files. Each administering agency provided information about recipients who received program benefits in the month of November 2025. The data was formatted, as required by SAVE, and processed through the SAVE program in March 2026 for LHEAP, SNAP, and OWF and April 2026 for Medicaid, PFCC, and UI. The SAVE program results we obtained are shown in

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Appendix B, in aggregate form. A sample of individuals was selected for detailed testing over each program based on the SAVE category the recipient was in when we ran the search of the SAVE program.

Audit Results

Using audit sampling procedures consistent with AICPA standards, we tested a sample of 312 recipients, from the population of 150,743 detailed below, across six public benefit programs to individually determine whether the state agency examined and maintained documentation concerning the recipients' eligibility based on citizenship and immigration status.

After evaluating the recipients in the sample populations, the audit found the SNAP, LHEAP, PFCC, and UI recipient sample populations had no exceptions. However, we noted for those tested where an exception was identified, the state agency either: (1) did not correctly evaluate the information on required immigration documentation it otherwise properly gathered and examined; (2) did not maintain in the recipient files the documentation relied upon by the agency to determine eligibility based on citizenship and immigration status; or (3) improperly reported a recipient as being paid under the agency's program.

The table below summarizes the results of the audit.

Public Benefit Program	Total Recipients in Sampled SAVE Categories	Sample Size	Total Exceptions
Medicaid	111,106 ⁴	60	6 (10%)
SNAP	29,944	60	0
OWF	2,472	60	2 (3%)
LHEAP	116	12	0
PFCC	6,531	60	0
UI	574	60	0
Totals	150,743	312	8 (3%)

Further details related to the exceptions are explained below:

- In five instances, the documents collected did not demonstrate eligibility.
 - For two Medicaid recipients, the applicant indicated they were a U.S. citizen and electronic verifications were performed. However, the results in these cases indicated the birth date or name and social security numbers (SSN) provided did not match. In the first case, it does not appear that any follow-up was performed or additional documentation was requested at the time of application. In the second case, a marriage certificate was maintained in the applicant's file to explain why the name and SSN didn't match; however, no electronic

⁴ The Working Families Tax Cut Act will require the Ohio Medicaid population to be reviewed as a consequence of the elimination of several categories of formerly qualified aliens, including asylees, parolees, and those with Temporary Protected Status. The Act exempted certain Cuban/Haitian entrants from the changes. As a result of the Act, ODM will have to review eligibility for current recipients in the altered categories. ODM may use the SAVE program to identify U.S. citizens and lawful permanent residents who will continue to be eligible for benefits. However, ODM must conduct additional reviews beyond the SAVE program search to evaluate recipients who are not Compacts of Free Association residents and those recipients whose immigration statuses fall outside the specific exemptions granted to Cuban/Haitian.

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- verification appears to have been successfully completed using the corrected name at the time of application.
- For one Medicaid⁵ and one OWF recipient, a non-citizen presented valid immigration documents (I-797A, I-94) during the initial application process. However, these documents expired prior to the applicant's next redetermination date and no additional verification was sought to ensure continued eligibility.
 - For one OWF recipient, the applicant provided an employment authorization document (EAD) card to support their application; however, the agency failed to note the "C33" status on the EAD card provided. This notation meant the individual's basis for being in the country was based on deferred action for childhood arrivals (DACA). DACA individuals and other non-qualified aliens are ineligible to receive OWF benefits.
 - In two instances, ODM did not maintain in recipient files the documentation it relied on to determine eligibility.
 - For one recipient, ODM did not maintain any information in the applicant's file that it relied upon to determine the applicant had a satisfactory immigration status to be enrolled in the program.
 - For a second recipient, ODM noted the applicant provided immigration documentation; however, ODM did not maintain those documents in the applicant's file even though they were used to determine the applicant's eligibility.
 - In one instance, a recipient was enrolled under ODM's program; however, the recipient did not have a file in the State's eligibility system, which would indicate that the person was not actually receiving public benefits.

The two OWF recipient exceptions identified above reflect potential ineligible public benefit payments. If the same errors were made proportionally across the population of OWF recipients in November 2025 and were annualized, there could be a potential projected exception of approximately \$700,000.

Discernable Trends in Recipients Across the State

Based on the data received for November 2025, we also performed a data crossmatch to determine how many individuals were receiving benefits across multiple programs and if there were any significant trends in the data.

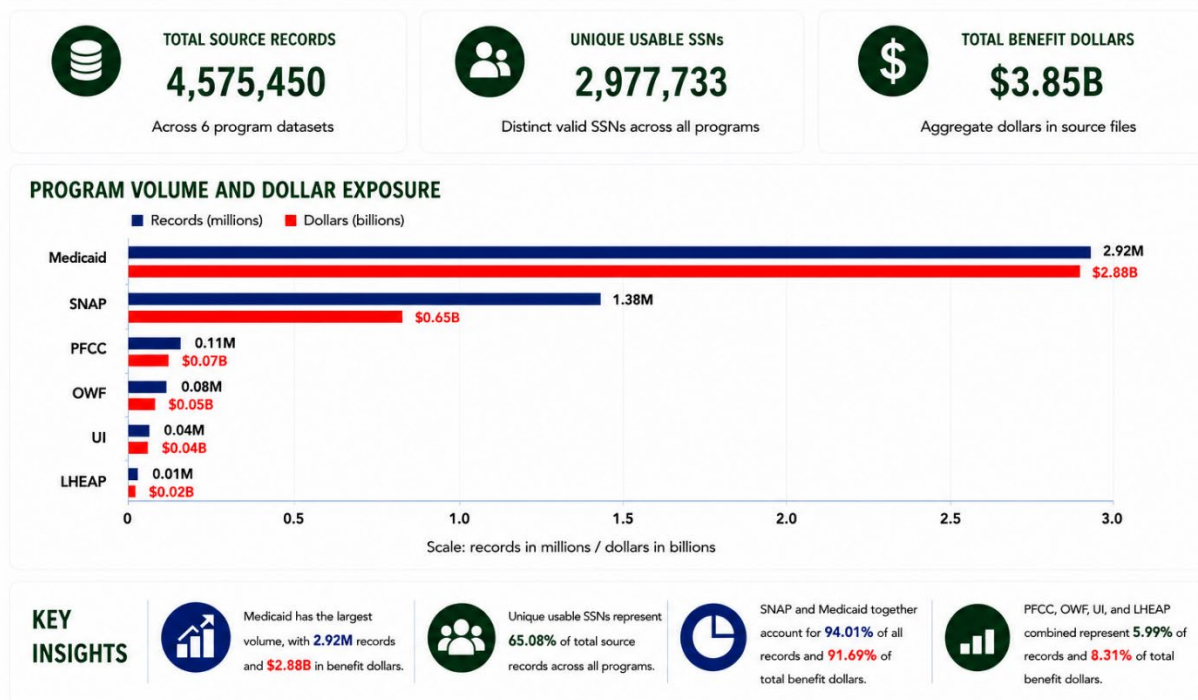
⁵ After testing was completed, ODM provided documentation to verify continued eligible immigration status.

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The first analysis provides an overview of the scope of the programs in terms of individuals receiving benefits and the dollar value of those benefits.

EXECUTIVE OVERVIEW

OVERVIEW OF SOURCE DATA



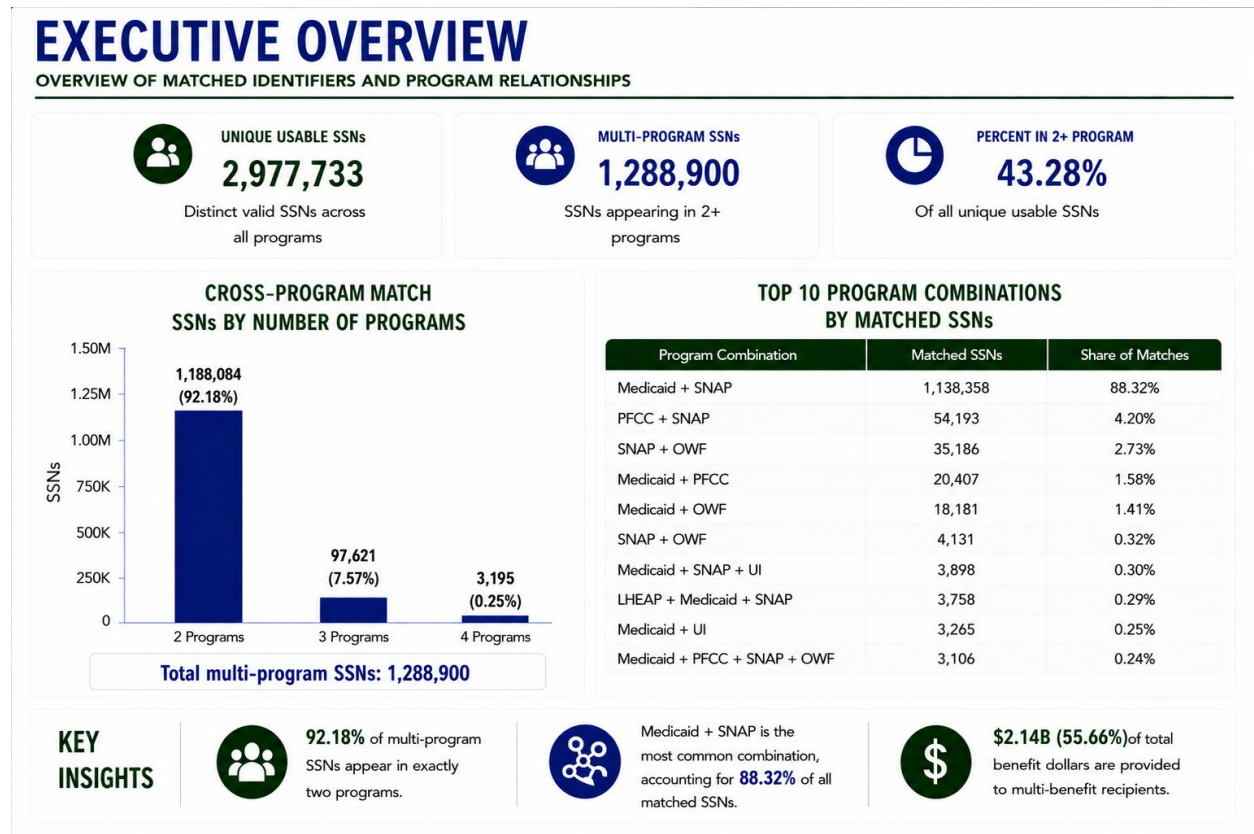
Public assistance reaches a substantial share of Ohio's population: With 2.98 million unique individuals identified across the analyzed programs, approximately one in four Ohioans received benefits from at least one of the major public benefit programs reviewed, based on Ohio's population of 11.9 million. This demonstrates the significant utilization of Ohio's public benefit program. Based on the benefits paid in November 2025, Medicaid and SNAP comprise the largest programs in dollars and enrollment.

Ohio's scale makes administrative improvements especially impactful: As the seventh most populous state, even small improvements in eligibility accuracy or program integrity can affect hundreds of thousands of people and hundreds of millions of dollars in annual expenditures, resulting in far greater fiscal and operational impacts than would be seen in smaller states.

Ohio is representative enough to serve as a benchmark: Because Ohio's demographics, economy, and urban-rural mix closely resemble those of many Midwestern states, findings from this analysis may be informative for peer states evaluating cross-program eligibility, fraud detection, and integrated service delivery.

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The second analysis looks at multi-program public benefit enrollment across the programs subject to this audit. For a full comparison of the program combinations, see Appendix C. We would expect, due to the nature of the programs and overlapping eligibility requirements, that many Ohioans receiving benefits would receive more than one benefit. The data showed that the overwhelming majority (92%) of recipients enrolled in a program in November 2025 participate in only two benefit programs, with the combination of Medicaid and SNAP benefits being the predominate types of benefits (88%). Less than one percent of those enrolled in a benefit program in November 2025, were enrolled in all four of the largest benefit programs (Medicaid, PFCC, SNAP, and OWF).



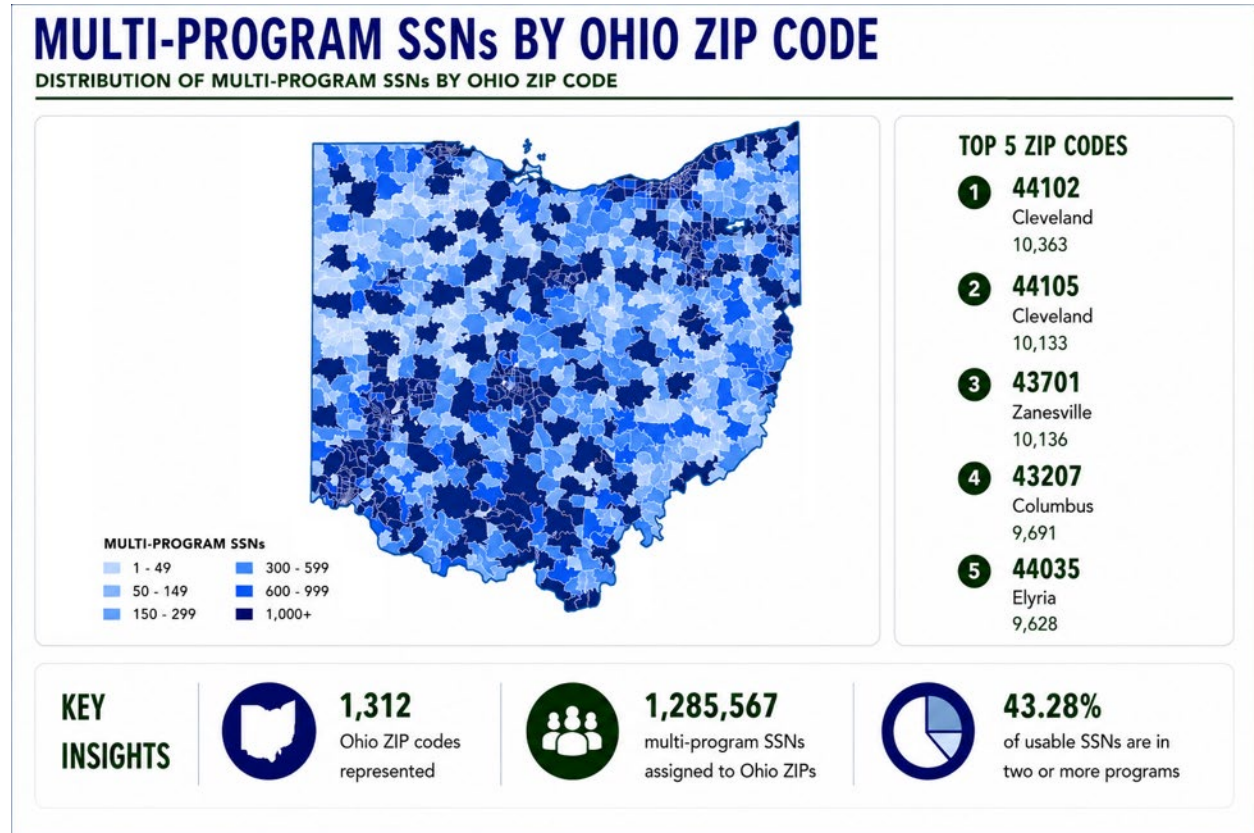
Public assistance should be viewed as an integrated system, not separate programs: Many recipients participate in two or more programs, demonstrating that Medicaid, SNAP, cash assistance, and other benefit programs serve many of the same households. Policy decisions affecting one program are therefore likely to influence participation, costs, and outcomes in others.

Administrative data sharing has significant value: Because the same individuals appear across multiple programs, agencies can leverage existing eligibility information to improve accuracy, reduce duplicate verification efforts, identify conflicting information, and simplify client interactions. Cross-program data matching can strengthen program integrity while reducing administrative burden.

Program overlap provides opportunities for targeted oversight: Individuals enrolled in multiple benefit programs present opportunities for more efficient fraud detection and eligibility reviews because a single verification effort may affect several programs simultaneously. Cross-program analytics can help prioritize reviews based on risk while minimizing unnecessary contact with compliant recipients.

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The third data analysis looks at concentrations of multi-program participation by zip code.



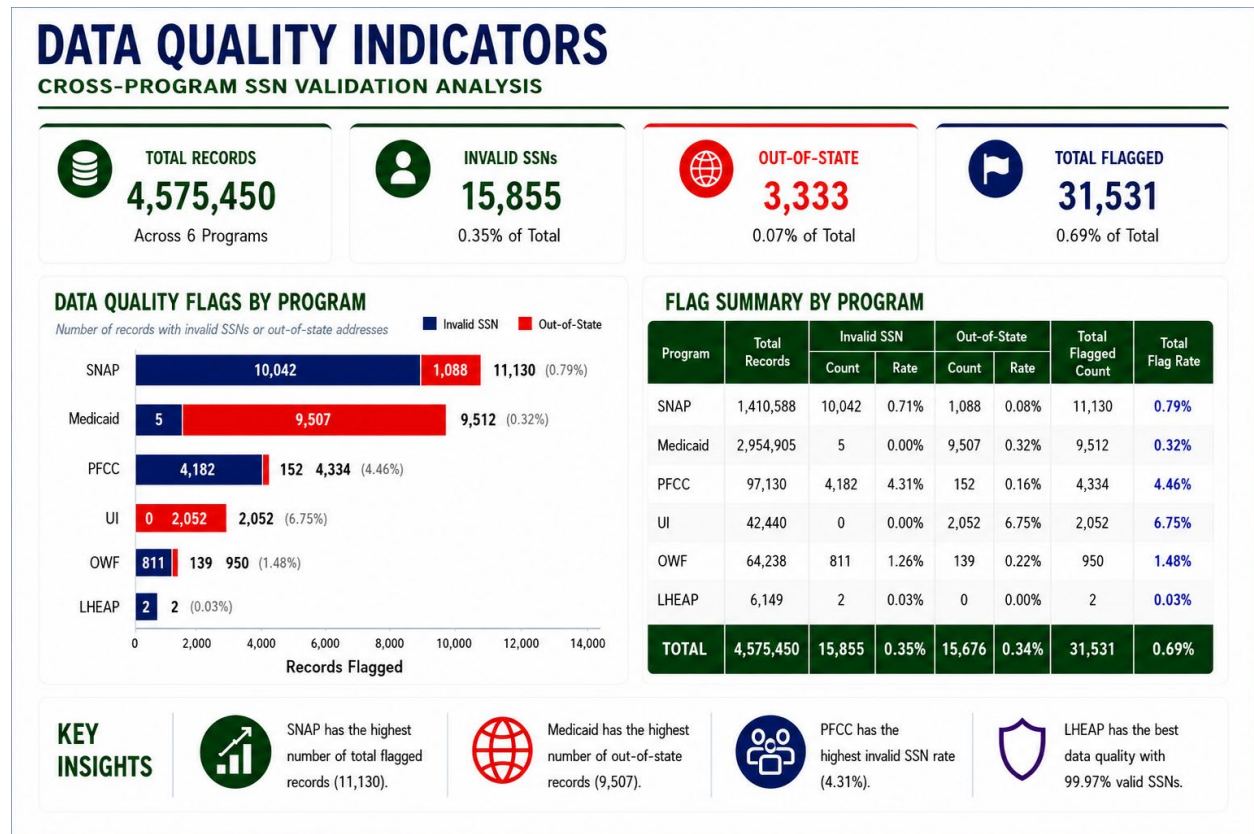
Geographic program participation highlights workforce and economic trends: Geographic concentrations of public benefit participation can evaluate the relationship between labor market conditions and public benefit utilization, and support evidence-based decisions regarding workforce development, education, transportation, and economic investment.

Integrated analytics can improve resource allocation: Understanding where multiple benefits converge enables policymakers to better target outreach, prioritize service delivery, and direct investigative resources toward areas with the greatest potential impact, while ensuring benefits reach eligible Ohioans efficiently.

Need exists in every region of Ohio: While large metropolitan areas show the highest concentrations of multi-program recipients, the map demonstrates rural and suburban communities also have substantial overlaps. These areas may benefit from enhanced service coordination, targeted outreach, or focused program integrity efforts.

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The fourth data analysis reviews the completeness of the agencies' information about the recipients in November 2025. We refer to that as the quality of the data received from the agencies, with the most significant data quality results being out of state zip codes and SAVE result categories, including "null"⁶ and "no social security number found in data file." While not necessarily indicative of an exception or violation of program requirements, these result categories generally relate to either data errors (e.g., errors in names, transposed numbers, or incomplete numbers), SSNs not entered in the recipient file by the agency, or children's SSNs that were not available at the time of application and these SSNs were not followed up on by the agency.



Overall data quality is strong: Across 4.5+ million records, a small percentage were flagged for either an invalid SSN or an out-of-state address. This suggests that Ohio's eligibility systems maintain a high degree of data integrity while identifying a relatively small population requiring additional review.

Targeted data validation is more effective: Because fewer than one percent of all records are flagged, policymakers should focus investigative resources on a relatively small subset of higher-risk records.

Out-of-state addresses do not necessarily indicate ineligibility: Individuals may legitimately maintain out-of-state mailing addresses while remaining eligible for benefits (e.g., military families, homeless individuals, temporary relocations, or interstate care arrangements). These records should be viewed as risk indicators for review.

⁶ Null results are produced for the following reasons: (1) SSN, not a number (this was either all zeros or all 9's). (2) first/middle/last name contain numbers or invalid characters. (3) invalid date of birth. (4) duplicate cases.

Appendix A

Audit Result Recommendations

Maintain Underlying Supporting Documentation

Maintaining organized documentation and support for public benefit payments is essential to ensure all expenditures are valid under the respective laws and regulations. For the Medicaid program, **42 C.F.R. § § 435.914 and 431.17** state “[t]he agency must include in each applicant's and beneficiary's case record . . . information and documentation” including “all documents or other evidence to support any determination . . . including decisions made at application, renewal, and as a result of a change in circumstance, taken with respect to the applicant or beneficiary, including all information provided by, or on behalf of, the applicant or beneficiary, and all information obtained electronically or otherwise by the agency from third-party sources.” For the OWF program, **Ohio Admin. Code 5101:1-1-13 and 5101:1-1-50** state “[a] ‘case record’ is a collection of hard copy, online, and electronic documents to support that the county agency has determined the assistance group's eligibility for the Ohio works first . . . [it] contains information to support program eligibility and participation requirements . . . [t]he documents in the case record are needed to facilitate a third-party review” and “documents shall be provided by an individual who is not a citizen or national of the U.S [to establish eligibility based on immigration status] . . .”

Due to a lack of controls over the documentation maintained in the applicant files, we noted missing underlying documentation and support for eligibility determinations for three of 312 tested.

Without proper controls for entering, processing, and maintaining recipient information, there is an increased risk that benefits paid to or on behalf of recipients will be inaccurate or unallowable. Overpayments or payments to or on behalf of ineligible recipients may subject the State to penalties or sanctions which may jeopardize future funding and limit its ability to fulfill program requirements to provide benefits to those in need.

We recommend the state agency maintain all records and support for eligibility determinations within the respective applicants’ file and in an orderly manner. We recommend each state agency management evaluate and strengthen the existing controls to identify where improvements can be made to minimize the risks of inaccurate benefit determinations. We also recommend the state agencies monitor the established controls to determine if they are working as intended by management. In addition, state agency management should perform periodic reviews of the case files to reasonably ensure case file information is properly maintained and accurately entered into the system. Furthermore, we recommend the state agencies provide uniform training about maintaining recipient files to all county agency employees responsible for taking and processing public benefit applications.

Improper Benefits Decision

Ohio Admin. Code 5101:1-2-30 establishes what eligibility standards are used to determine citizenship and immigration status of individuals applying for OWF and requires that an individual is either a U.S. citizen, a non-citizen national, or a qualified alien. Individuals with DACA status are not within any of those statuses and therefore are not eligible to receive OWF assistance.

Appendix A

Due to a lack of adequate training across the public benefit programs, one OWF recipient tested provided information reflecting an indication of DACA status, which was improperly accepted by the agency.

Failure to have adequate training and a detailed understanding of the laws and regulations for each aspect of every public benefit program could result in ineligible recipients receiving benefits.

We recommend the state agency evaluate its internal controls, specifically related to allowable exceptions for eligibility status, to ensure when the proper documentation is received, that it is evaluated appropriately. We also recommend the state agencies provide regular, uniform training material for the counties administering these programs, while also implementing a monitoring program over the county administration of the programs to ensure proper determinations are being made for eligibility and proper documentation is maintained.

Protocols for Electronic Data Exchange Results

Ohio Admin. Code 5160:1-2-11 indicates a Medicaid applicant who declares as a U.S. citizen or a national of the U.S. shall verify citizenship in accordance with **42 C.F.R. § 435.407**. When the state agency is unable to verify an individual's citizenship through the SSA or DHS electronic data exchange in the State's eligibility system, additional documentation should be requested to the applicant. In the absence of such documentation, benefits may not be approved or renewed.

Due to key controls missing in the State's eligibility system, we noted two instances based on the case file review, where automated database checks failed or the federal hub ping indicated an inconsistency in a Medicaid recipient's identifiers (i.e., the date of birth or name and SSN did not match), such as an applicant's identifiers failing to match a federal database during an electronic verification, yet the cases advanced through the eligibility system without appropriate secondary manual verification or we were not provided any evidence the state agency ran a successful electronic verification after it obtained additional information to overcome or clarify the inconsistency.

Failure to have proper controls in place to ensure this rule is met could result in public funds being improperly distributed.

We recommend the state agency evaluate and strengthen procedures which may include the implementation of a "hard-stop" within the State's eligibility system so that incomplete or erroneous data fields automatically prevent the caseworker from progressing to the next screen to ensure unverified identity or citizenship profiles are flagged and resolved before public benefits are distributed.

Policy Considerations

Differences in Documentation Retention Requirements Among Programs

Applicants for public benefits in Ohio apply through a single county agency contact for the SNAP, OWF, PFCC, and Medicaid programs. This means, in some instances, the front-line county employees are charged with knowing and applying the various eligibility rules and documentation requirements for all of these programs. When the programs entail different requirements, this can invite errors in determinations and in record keeping.

Appendix A

To the extent permitted within Ohio's authority to administer the programs, Ohio agencies should synthesize documentation requirements so that the same requirements of what the agency is required to obtain from the applicant are the same across benefit programs.

Mandatory Retention of Electronic Verification and SAVE Documentation

For an agency that is not already required to retain electronic verification and SAVE documentation, state agencies should require a permanent, dated record of the electronic query result be archived directly within the applicant's case file when the agency utilizes a federal or state electronic database match to verify an applicant's identity, citizenship, or immigration status.

Across the public benefit programs, successful electronic matching appropriately waives the need for physical paperwork from the applicant. However, failing to save the electronic confirmation within the localized case file creates an administrative blind spot. Under federal Single Audit standards (2 C.F.R. § 200.303), state agencies must provide verifiable evidence that internal controls were executed; however, there is not an explicit requirement to maintain the electronic verification documentation in the case file. Leaving verification data exclusively within external databases severely hinders audit efficiency, challenges cross-program transparency and risks formal non-compliance findings. This ensures a permanent digital trail remains anchored to the case profile.

Alignment of Redetermination Windows with Status Expiration Dates

When a participant is approved for public benefits based on a conditional, time-limited, or temporary immigration status, the administering agency should configure the eligibility system to trigger a targeted redetermination date to coincide with the expiration date of the temporary federal documentation (e.g., EAD, Form I-797A), rather than waiting for the standard annual recertification timeline.

Under current practices, individuals holding a temporary or conditional status that expires mid-year may continue receiving public assistance long after their legal authorization has lapsed simply because the system defaults to a set renewal schedule. Aligning the state's eligibility redetermination window with the expiration date listed on the participant's immigration documents proactively protects program integrity and ensures benefits are only extended to legally qualified non-citizens.

Establish Standardized and Verifiable Identity Definitions

State public benefit program rules, where applicable, should be amended to establish clear, objective baselines for acceptable physical documentation. For example, for programs permitting a civilian birth certificate for identity and eligibility verification, the document should be strictly defined as an official vital record issued by an authorized government, the Bureau of Vital Statistics (or equivalent), and should explicitly contain the individual's full name and location of birth.

For some programs, for example PFCC, ambiguous or loose definitions of acceptable documentation across public benefit programs have led to the administrative acceptance of incomplete and unverified records (such as birth records entirely missing the applicant's name, crib cards and fillable hospital forms). Standardizing clear criteria for vital physical documents across all county agencies where state administrative rules can fill in gaps left by federal law ensures that identity verification issues are caught early, processed uniformly, and defensible during quality assurance reviews. This eliminates subjective interpretations by caseworkers across Ohio's 88 counties.

Appendix A

Receipt of Benefits while Immigration Eligibility Status is being Evaluated

For some benefits programs, an applicant may receive benefits while their immigration status is being verified by the agency. For example, under **Ohio Admin. Code 5160:1-2-12(G) and (H)**, Medicaid has a "reasonable opportunity period" that permits an applicant who declares a valid immigration status and meets all other Medicaid eligibility requirements to receive benefits for up to 90 days while the agency verifies the applicant's immigration status. OWF has a similar, but slightly different rule, under **Ohio Admin. Code 5101:1-1-50(E)(2)** which states the agency must provide an applicant benefits while awaiting SAVE results, if all other eligibility criteria for the program are satisfied.

For programs with these types of "grace periods," there is a possibility an applicant could receive public benefits they would otherwise not be entitled to receive if they are later found to have an ineligible immigration status. Typically, SAVE results take less than 48 hours to receive. However, these "grace period" benefits, even if provided for only a short period of time, could prove quite costly if they occur numerous times over the course of many years. Because the time between when a person may apply for a benefit and when the benefit could be approved following electronic verification of citizenship and immigration status is not significant, an alternative could entail eliminating the "grace periods." This would place immigration eligibility criteria under the same treatment as other program eligibility criteria and benefits could not be disbursed until final evaluation of each aspect of eligibility. Instead, these programs should allow an applicant to have benefits backdated to the time of application, if the application is ultimately verified. This would allow eligible applicants to ultimately receive benefits during the period their application was pending, while ensuring ineligible applicants never receive benefits they aren't entitled to receive, simply because verifying all eligibility criteria might take time. Medicaid already has a similar system for other eligibility criteria, where Medicaid benefits are always deemed to have started on the first day of the month the application is submitted, even if the application takes significant time to approve. For example, if an application is made on June 5 and fully approved on August 1, if an individual requires medical treatment on July 1, Medicaid will cover that treatment, because coverage is deemed to have begun on June 1.

However, in both Medicaid and OWF, the Ohio regulations cited above directly restate federal laws and guidance applicable to TANF, which is used to fund OWF, and Medicaid funds, so any substantive changes in policy related to these programs would need to come from the federal government.

Annual Ohio Benefits Data Review

Cross-program data matching provides valuable insights for policy refinement, data quality assurance, and issue identification. Much of the data analyzed in this audit is housed within Ohio Benefits; initial investigations revealed several baseline data quality concerns, as illustrated in the accompanying infographics in the Supplement to the Public Interest Report.

As seen in Appendix C, cross-program analysis provides a dataset illustrating how public assistance programs overlap among households and individuals. Examining the frequencies of these combinations yields key insights, as well as structural explanations for why eligible participants may not be enrolled in programs for which they qualify:

Safety Net Pillars: Whenever multiple programs appear (such as PFCC, TANF, UI, or LIHEAP), they almost always do so in conjunction with Medicaid and/or SNAP. This demonstrates that Medicaid and SNAP serve as the foundational safety net pillars that most other program recipients utilize simultaneously.

Appendix A

Recertification Deadlines: Programs maintain independent renewal timelines (e.g., SNAP may require semi-annual reporting, whereas Medicaid typically relies on annual renewals). A household might remain fully eligible across multiple programs yet miss a renewal window, creating a temporary coverage gap in one program while others remain active.

Technical Criteria: Although financial guidelines (such as Federal Poverty Level percentages) frequently overlap, individual programs enforce unique non-financial rules. Immigrant eligibility restrictions, remaining asset limits, and household composition definitions can create scenarios where an applicant clears the criteria for two programs but encounters a technical barrier on a third.

To unlock these insights, the state should leverage cross-program data and usage frequencies to drive macro-level analytics for policymakers on an annual basis.

Appendix B

SAVE Results

The following tables reflect the SAVE results we received after running the population of benefits recipients on each program during November 2025 through the SAVE program.

Note: The categories with a “***” indication were not subject to this additional review of documentation. The remaining categories were selected for additional review because the SAVE result indicated an inconclusive result with respect to eligibility or identified an immigration status that may or may not have been a “qualified alien” eligible for benefits. The categories with a “^^” indication are non-U.S. citizens or nationals who have properly filed applications to obtain status as a permanent resident, asylee, or as an immigrant with temporary protected status; however, these applications have not been approved or adjudicated, meaning these applicants do not yet lawfully hold the applied for status.

Medicaid	Count
** United States Citizen (per SSA Record)	2,774,063
** United States Citizen (per DOS Record)	24,157
** United States Citizen	2,249
** Lawful Permanent Resident - EMPLOYMENT AUTHORIZED	20,120
Refugee Employment Authorized	4,008
Parolee	1,543
Parolee - Temporary Employment Authorized	15
Asylee - EMPLOYMENT AUTHORIZED	619
Conditional Resident - Employment Authorized	380
Temporary Protected Status - Employment Authorized	223
Non - Immigrant - Employment Authorized Indefinitely	1
No Record Found with SSA - Resubmit with Additional Information	71,507
Immigration Enumerator Required - Resubmit with Additional Information	14,448
Null	7,125
Institute Additional Verification	4,667
Deferred Action - TEMPORARY EMPLOYMENT AUTHORIZED	244
Deferred Action - Not Employment Authorized	13
^^ Application Pending (ASYLUM) - TEMP EMP AUTH	5,661
^^ Application Pending (TPS) - TEMP EMP AUTH	304
^^ Application Pending (ADJ OF STATUS) – TEMP EMP AUTH	97
DACA - Temporary Employment Authorized	130
Temporary Employment Authorized	68
Non - Immigrant - TEMPORARY EMPLOYMENT AUTHORIZED	36
Non - Immigrant - Not Employment Authorized	11
Non – Immigrant	5
Deferred Enforced Departure - TEMP EMP AUTH	1
** Deceased (per SSA Record)	23,256
Total	2,954,951

Appendix B

SNAP	Count
** United States Citizen (per SSA Record)	1,355,560
** United States Citizen (per DOS Record)	7,961
** United States Citizen	1,014
** Lawful Permanent Resident - EMPLOYMENT AUTHORIZED	9,039
Refugee Employment Authorized	1,058
Parolee	241
Parolee - Temporary Employment Authorized	4
Asylee - EMPLOYMENT AUTHORIZED	214
Conditional Resident - Employment Authorized	57
Temporary Protected Status - Employment Authorized	43
No Record Found with SSA - Resubmit with Additional Information	10,976
Unable to Process	1
No Social Security Number in Data File ⁷	10,042
Immigration Enumerator Required - Resubmit with Additional Information	5,582
Null	3
Institute Additional Verification	944
Deferred Action - TEMPORARY EMPLOYMENT AUTHORIZED	9
^^ Application Pending (ASYLUM) - TEMP EMP AUTH	600
^^ Application Pending (TPS) - TEMP EMP AUTH	76
^^ Application Pending (ADJ OF STATUS) – TEMP EMP AUTH	28
DACA - Temporary Employment Authorized	45
Temporary Employment Authorized	13
Non - Immigrant - TEMPORARY EMPLOYMENT AUTHORIZED	6
Non – Immigrant	2
** Deceased (per SSA Record)	7,070
Total	1,410,588

⁷ A SAVE result category of “No Social Security Number in Data File” is included for both SNAP and OWF; however, this is not a category defined by SAVE. This response means the data file provided by the respective agency did not include the SSN to allow SAVE to process the request.

Appendix B

OWF	Count
** United States Citizen (per SSA Record)	61,464
** United States Citizen (per DOS Record)	55
** United States Citizen	15
** Lawful Permanent Resident - EMPLOYMENT AUTHORIZED	215
Refugee Employment Authorized	470
Parolee	17
Asylee - EMPLOYMENT AUTHORIZED	18
Temporary Protected Status - Employment Authorized	2
No Record Found with SSA - Resubmit with Additional Information	789
No Social Security Number in Data File ⁷	811
Immigration Enumerator Required - Resubmit with Additional Information	201
Institute Additional Verification	73
^^ Application Pending (ASYLUM) - TEMP EMP AUTH	86
^^ Application Pending (TPS) - TEMP EMP AUTH	3
DACA - Temporary Employment Authorized	2
** Deceased (per SSA Record)	17
Total	64,238

LHEAP	Count
** United States Citizen (per SSA Record)	5,963
** United States Citizen (per DOS Record)	11
** United States Citizen	2
** Lawful Permanent Resident - EMPLOYMENT AUTHORIZED	12
Refugee Employment Authorized	1
No Record Found with SSA - Resubmit with Additional Information	99
Immigration Enumerator Required - Resubmit with Additional Information	12
Null	1
Institute Additional Verification	1
DACA - Temporary Employment Authorized	1
Temporary Employment Authorized	1
** Deceased (per SSA Record)	43
Total	6,147

Appendix B

PFCC	Count
** United States Citizen (per SSA Record)	90,233
** United States Citizen (per DOS Record)	156
** United States Citizen	27
** Lawful Permanent Resident - EMPLOYMENT AUTHORIZED	176
Refugee Employment Authorized	212
Parolee	73
Asylee - EMPLOYMENT AUTHORIZED	7
Conditional Resident - Employment Authorized	2
Temporary Protected Status - Employment Authorized	5
No Record Found with SSA - Resubmit with Additional Information	1,706
Immigration Enumerator Required - Resubmit with Additional Information	205
Null	4,194
Institute Additional Verification	67
^^ Application Pending (ASYLUM) - TEMP EMP AUTH	33
^^ Application Pending (TPS) - TEMP EMP AUTH	27
** Deceased (per SSA Record)	9
Total	97,132

UI	Count
** United States Citizen (per SSA Record)	41,151
** United States Citizen (per DOS Record)	368
** United States Citizen	28
** Lawful Permanent Resident - EMPLOYMENT AUTHORIZED	240
Conditional Resident - Employment Authorized	20
Asylee - EMPLOYMENT AUTHORIZED	6
Refugee Employment Authorized	3
Temporary Protected Status - Employment Authorized	2
Parolee	1
DACA - Temporary Employment Authorized	13
Temporary Employment Authorized	6
Non - Immigrant - TEMPORARY EMPLOYMENT AUTHORIZED	2
No Record Found with SSA - Resubmit with Additional Information	256
Immigration Enumerator Required - Resubmit with Additional Information	205
Institute Additional Verification	19
^^ Application Pending (ASYLUM) - TEMP EMP AUTH	38
^^ Application Pending (ADJ OF STATUS) – TEMP EMP AUTH	3
** Deceased (per SSA Record)	78
Total	42,439

Appendix C

Multi-Program Benefits

Note: The month (median) reflects the median of the payments paid for multi-program benefits in November 2025 (the audit period). The annualized figure accounts for an average benefit duration of approximately 13 weeks under UI, rather than the maximum 26 weeks allowed by the program. This estimate provides policymakers with a realistic projection of total benefit amounts paid per claimant across combined programs.

Program Combinations	Count	Month (Median)	Annualized
Medicaid + SNAP	1,138,358	\$1,075	\$12,900
Medicaid + PFCC + SNAP	54,193	\$1,812	\$21,744
Medicaid + SNAP + OWF	35,186	\$1,654	\$19,848
Medicaid + PFCC	20,407	\$1,094	\$13,128
Medicaid + OWF	18,181	\$837	\$10,044
SNAP + OWF	4,131	\$1,355	\$16,260
Medicaid + SNAP + UI	3,898	\$2,126	\$8,868
LHEAP + Medicaid + SNAP	3,758	\$1,454	\$17,448
Medicaid + UI	3,265	\$1,788	\$10,572
Medicaid + PFCC + SNAP + OWF	3,106	\$2,627	\$31,524
PFCC + SNAP	1,436	\$1,644	\$19,728
SNAP + UI	1,089	\$1,707	\$5,151
LHEAP + Medicaid	873	\$897	\$10,764
Medicaid + PFCC + OWF	508	\$1,819	\$21,828
LHEAP + SNAP	314	\$560	\$6,720
PFCC + SNAP + OWF	51	\$2,364	\$28,368
LHEAP + Medicaid + SNAP + UI	42	\$2,577	\$7,470
LHEAP + Medicaid + SNAP + OWF	31	\$2,281	\$27,372
LHEAP + UI	18	\$1,411	\$5,808
Medicaid + SNAP + OWF + UI	15	\$2,886	\$9,798
LHEAP + Medicaid + UI	15	\$1,946	\$5,595
PFCC + OWF	12	\$1,354	\$16,248
LHEAP + SNAP + UI	5	\$2,520	\$6,876
Medicaid + OWF + UI	3	\$2,122	\$9,768
LHEAP + SNAP + OWF	2	\$1,793	\$21,516
LHEAP + Medicaid + OWF + UI	1	\$3,211	\$18,120
SNAP + OWF + UI	1	\$2,313	\$12,852
LHEAP + Medicaid + OWF	1	\$1,214	\$14,568

OHIO AUDITOR OF STATE KEITH FABER



OHIO PUBLIC BENEFIT PROGRAMS

FRANKLIN COUNTY

AUDITOR OF STATE OF OHIO CERTIFICATION

This is a true and correct copy of the report, which is required to be filed pursuant to Section 117.26, Revised Code, and which is filed in the Office of the Ohio Auditor of State in Columbus, Ohio.



Certified for Release 8/27/2026

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