

# Understanding How State Agencies Determine USDA Supplemental Nutrition Assistance Program (SNAP) Participants' Fitness for Work (Summary)

## Background

The U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) administers 16 nutrition assistance programs, including Supplemental Nutrition Assistance Program (SNAP), with the mission to increase food security and reduce hunger—in partnership with cooperating organizations—by providing children and low-income people access to food, a healthy diet, and nutrition education in a manner that supports American agriculture and inspires public confidence.

SNAP participants ages 16 to 59 are subject to general work requirements, which include registering for work, participating in Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T), or workfare if assigned by the State SNAP agency, taking a suitable job if offered, and not voluntarily quitting a job or reducing work hours below 30 a week without a good reason.

Adults ages 18 to 54 who are not disabled and live in households without dependents, or able-bodied adults without dependents (ABAWD), are a subset of SNAP participants who are not exempt from the general work requirements.<sup>1</sup> These individuals are subject to a time limit on a receipt of SNAP benefits unless they work or participate in a work program, or a combination of work and work program hours for an average of at least 20 hours per week for all but 3 months in a 36-month period. FNS provides guidance based on law and regulations of who can be excused from the general and ABAWD work requirements. However, State agencies use some discretion when deciding exemptions from the general work requirements and exceptions from the ABAWD work requirement. In addition to determining exemptions and exceptions from work requirements, State agencies may also make good cause determinations when an individual subject to work requirements fails to comply due to circumstances beyond the individual's control.

The study's goal is to better understand how State agencies determined whether individuals were excused from the general and ABAWD work requirements or had a good cause for not meeting work requirements due to physical or mental limitations.

## Key Findings

- The process for determining exemptions from the general work requirement and exceptions from the ABAWD work requirement generally did not differ across State agencies.
- State agencies usually asked about physical and mental limitations first on the application.
- Most State agencies reported that they sometimes required verification of physical or mental limitations regardless of interview mode.
- Over half of State agencies allowed staff discretion in the types of physical or mental limitations that eligibility workers could consider when determining exemptions or exceptions.
- Many of the physical and mental limitations that State agencies considered for a good cause determination, such as physical injuries and long-term illnesses, could also be considered for an exemption or exception.
- Among case study states, rates at which individuals were exempt from the general work requirement because of physical or mental limitations at application ranged from 7 to 17 percent.

<sup>1</sup> As of October 1, 2024, those subject to the ABAWD time limit increased to 18–54 years old due to the Fiscal Responsibility Act of 2023. Prior to September 1, 2023, the age limit for those subject to the ABAWD time limit was 18–49.

## Methods

The study collected data through: (1) a survey of 53 State SNAP agencies; (2) a document review at those agencies; and (3) in-depth case studies of Georgia, Maryland, Texas, and Wisconsin, including semi-structured interviews and administrative data analysis. The survey was fielded from October 2022 through March 2023 with 48 complete responses and two partial complete responses.<sup>2</sup> The case study data collection began in October 2023 and ended in April 2024.

## Findings

**Most State agencies (98 percent) relied on Federal regulation, statute, or guidance when updating their policies and procedures on work requirements and good cause determinations.** Most State agencies used trainings and policy manuals to relay this information to staff.

**The process for determining exemptions from the general work requirement and exceptions from the ABAWD work requirement generally was the same at application and recertification among case study States.** The survey showed that within each State, the screening process for making exemptions and exceptions was typically the same, including staff involved, types of physical and mental limitations considered, when individuals are first asked about limitations, and when exemptions and exceptions could be reassessed.

**Allowing staff discretion in determining fitness for work was more common than allowing local variation.** The survey showed that few State agencies (none for the general work requirements and four percent for the ABAWD work requirement) allow for local variation in who is screened for exemptions and exceptions. However, more than half (56 percent) of State agencies allowed staff to use discretion in the types of physical or mental limitations that they consider in determining exemptions or exceptions.

**About two-thirds of State agencies ask about physical and mental limitations first on the application.** Case studies found some variation in whether applicants were asked about physical or mental limitations during the interview and how much information was considered from the application while making determinations.

**Interview screening processes for physical or mental limitations did not differ based on whether the interview was conducted over the phone or in person.** However, most State agencies (96 percent) reported that they did

not require face-to-face interviews. One case study, Georgia, indicated that fitness for work determinations were harder over the phone since limitations were not as easily visible. Case study States also highlighted the importance of using interview probes to identify physical and mental limitations to ensure consistency in determinations. For example, Maryland staff proposed adding questions to their eligibility system so that they would remember to probe on barriers to respondents being able to work.

**Most State agencies reported that they sometimes required verification of physical and mental limitations.** State agencies reported that they requested verification most commonly when the limitation was unclear. About one-fourth of State agencies reported that it was up to staff to ask for signed verification for both face-to-face and non-face-to-face interviews. The case study States indicated that requiring verification for determinations made the process straightforward but could shift the burden to applicants and participants.

**Most State agencies allowed applicants or participants to appeal fitness for work determinations.** Although over three-quarters of State agencies (78 percent) allowed applicants to appeal an exemption or exception decision, it was an uncommon practice in the four case study States.

**Exemptions or exceptions due to fitness for work were uncommon based on analysis of administrative data from cases studies.** Rates at which individuals were exempt from the general work requirement because of physical or mental limitations at application ranged across the four

States from 7 to 17 percent. Rates were higher (10 percent to 26 percent) at recertification. Exceptions from the time limit because of physical or mental limitations ranged from 2 to 8 percent at both application and recertification.

**There was some variability among the rate at which eligibility workers made fitness for work determinations.** Administrative data from case studies showed that eligibility workers in Texas and Maryland determined individuals as physically or mentally unfit at about the average rate for their States. There was more variation among Wisconsin eligibility workers with more than a quarter coding applicants at a much higher or lower rate than the average.

**Many of the physical and mental limitations that State agencies considered for a good cause determination such**

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<sup>2</sup> Percentages in the summary are based on the number of agencies that completed the survey.

**as physical injuries and long-term illnesses could also be considered for an exemption or exception.** Most State agencies also reported that a good cause determination could lead to an exemption from general work requirements (88 percent) or an exception from the ABAWD work requirement (86 percent). Case studies revealed that some staff treat good cause and exemptions and exceptions interchangeably whereas others use good cause for shorter-term issues and exemptions or exceptions for longer-term limitations.

**SNAP E&T programs had varying amounts of involvement in assisting with fitness for work determinations.** Case studies showed that in some States, SNAP E&T providers did not communicate with SNAP eligibility staff regarding fitness for work, whereas other States had a more collaborative relationship.

**For More Information:**

Steigelman, C., Castañeda, I., Kauff, J., et al. (2024). Assessing SNAP Participants' Fitness For Work. Prepared by MEF Associates, Contract No. GSA47QRAA19D00DK/12319820F0057. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, Project Officer: Amanda Wyant. Available online at: [www.fns.usda.gov/research-and-analysis](http://www.fns.usda.gov/research-and-analysis).