



Working Together to Serve Time-Limited Participants

Kristen Halverson and Alison Conrad

OCTOBER 29-30, 2024 | TYSONS CORNER, VA

Audience Question

Do you serve time-limited participants in any capacity?

Agenda

- Overview of the SNAP Work Requirements
- Equipping Eligibility Workers with tools and resources
- Communicating the Time Limit to Clients
- Leveraging Partnerships
- Questions

SNAP Work Requirements

Two Types of SNAP Work Requirements

General Work Requirements



Register for work, and



Accept an offer of suitable employment, and



Not voluntarily quit or reduce hours of employment below 30-hour work per week, without good cause, and



Participate in workfare or SNAP E&T if required by the State agency.

7 CFR 273.7(a)(1)

ABAWD Work Requirement



Work or participate in a work program, or any combination, for at least 80 hours a month, or

- Work can be paid or unpaid
- A work program could be SNAP E&T or a federal, state, or local work program



Participate in workfare for the number of hours assigned each month.

7 CFR 273.24(a)(1)

Exemptions from the General Work Requirements

An individual is exempt from the general work requirements if they are:

- Younger than 16 or older than 59
- Unable to work because of physical or mental limitation
- Enrolled in school or training program at least half time
- Working at least 30 hours a week (or equivalent)
- Meeting work requirements for TANF
- Receiving unemployment compensation
- Caring for child younger than 6 years or person who is incapacitated
- Participating regularly in alcohol or drug treatment program

7 CFR 273.7(c)

Exceptions from the Time Limit

An individual is exempt from the time limit if they are:

- Exempt from general work requirements
- Younger than 18 or older than:*
 - September 1, 2023: age 50
 - October 1, 2023: age 52
 - October 1, 2024: age 54
- Unable to work because of physical or mental limitation
- Sharing a household with a member younger than 18
- Pregnant
- Veteran*
- Homeless*
- An individual who is 24 years of age or younger and who was in foster care under the responsibility of a State on the date of attaining 18 years of age or such higher*

7 CFR 273.24(c) and Fiscal Responsibility Act (FRA)

* Indicates this exception was modified or added by the FRA

Verifying Work Hours

- State agencies are required to verify work hours at certification, recertification, and after a reported change.
- Examples of sources that can verify hours include:
 - Paycheck stubs
 - Employer statements
 - Third-party employment and earning verification systems
 - Collateral contacts
 - SNAP E&T provider or other qualifying work program provider

7 CFR 273.2(f)(1)(xiv), 2023 SNAP ABAWD Policy Guide, and SNAP Use of Information from Other Public Assistance Programs

Tracking Time-Limited Participants

- Tracking is essential to accurately enforcing the time limit.
- State agencies must determine which months an individual is and is not subject to the time limit and track this over the 36-month period.
- State agencies have some discretion to operationalize tracking but must still comply with policy requirements.

Tracking Examples

Example One

| | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec |
|--------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| Year 1 | | | | P | 1 | 2 | 3 | | | | | |
| Year 2 | | | | | | | | | | | | |
| Year 3 | | | | | | | | | | | | |

Example Two

| | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec |
|--------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| Year 1 | | | | P | 1 | M | M | 2 | 3 | | | |
| Year 2 | | | | | | | | | | | | |
| Year 3 | | | | | | | | | | | | |

P = Prorated Month

M = Meeting Work Requirement

Number 1, 2, or 3 = Countable Month

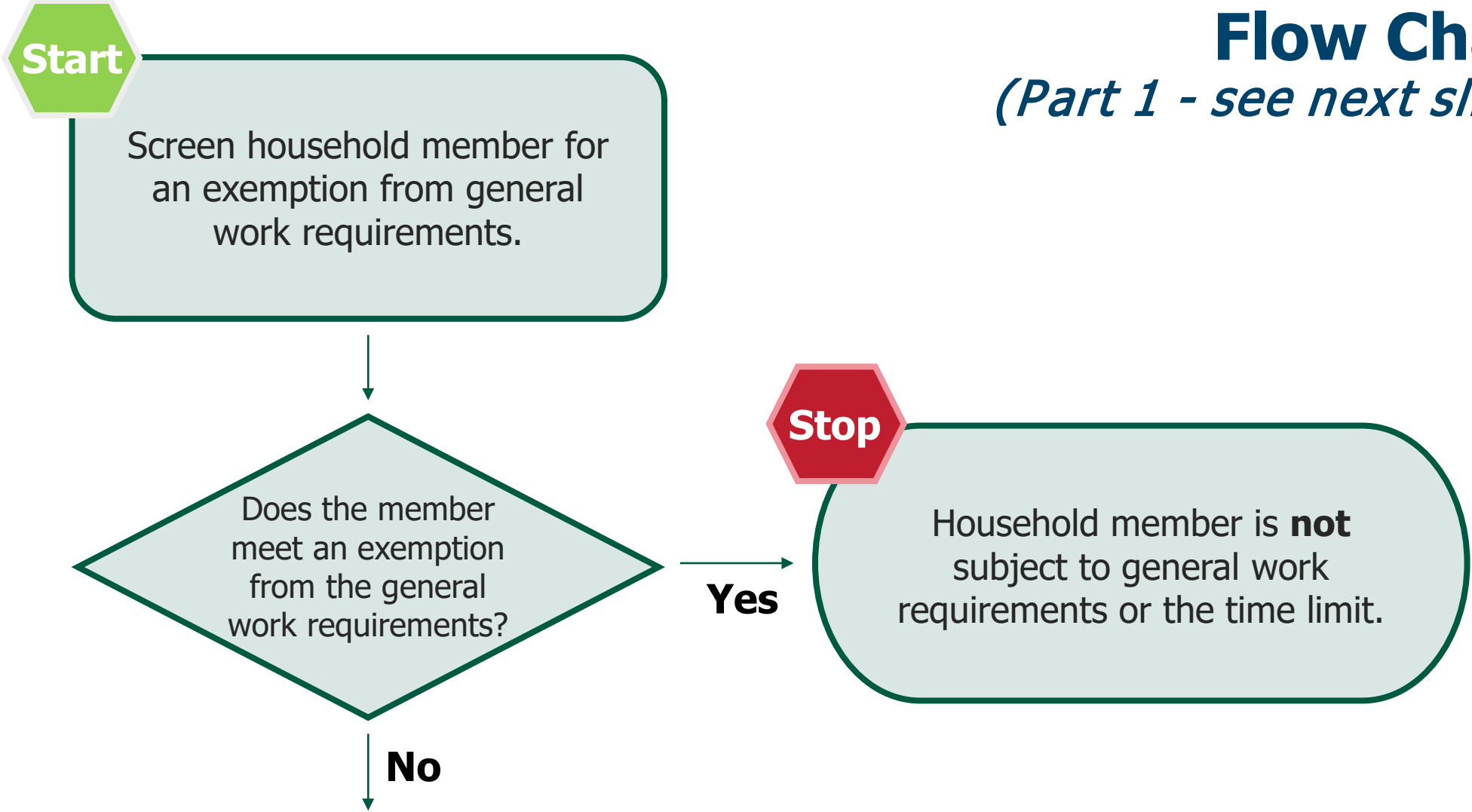
Equipping Eligibility Workers with Tools and Resources

Using Existing Data

- State agencies may have access to information that can help identify and verify exception status.
- State agencies should review information to ensure it aligns with exception definitions.
- State agencies may also consider if data sharing agreements with other programs could streamline operations.

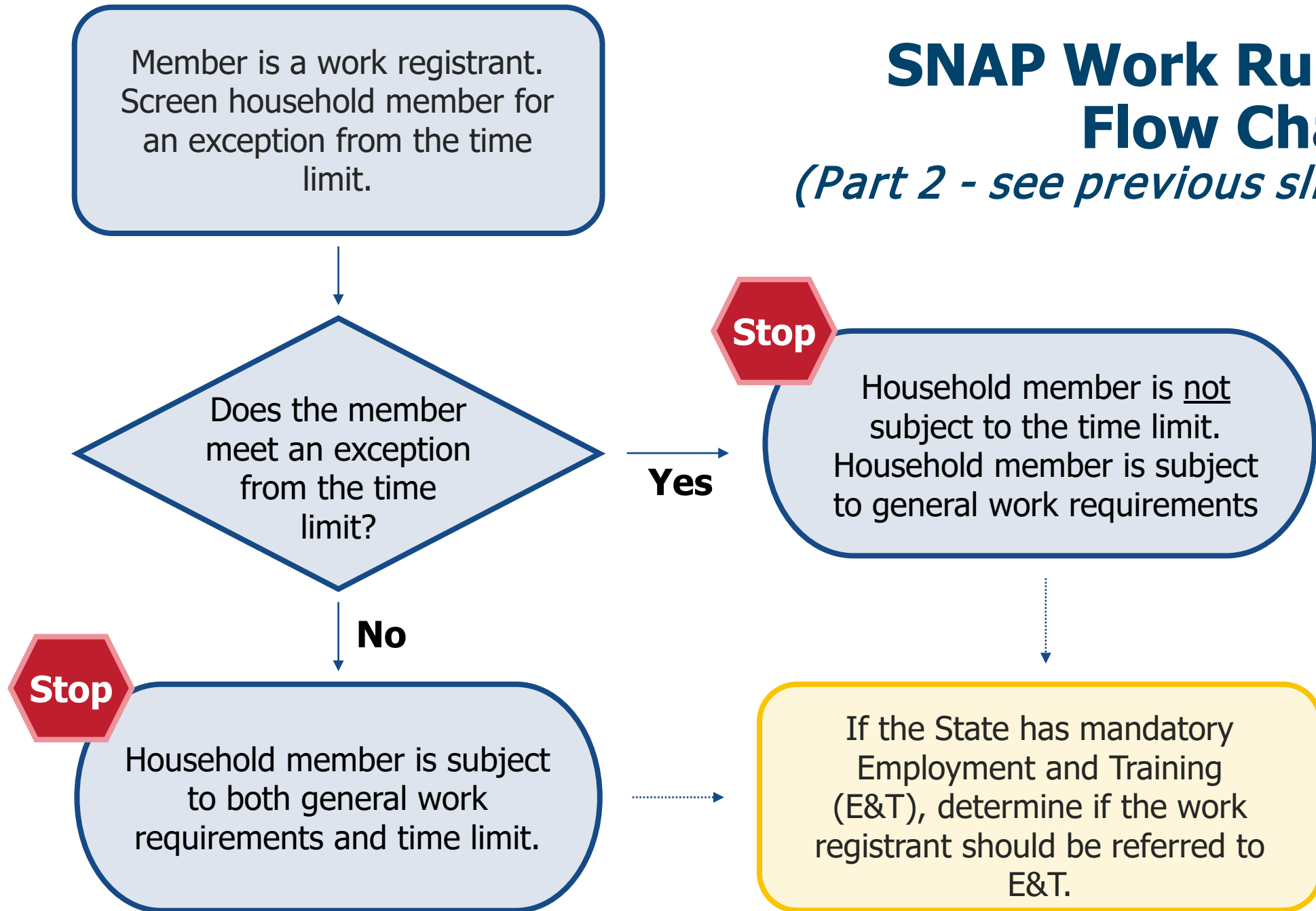
SNAP Work Rules Flow Chart

(Part 1 - see next slide)



SNAP Work Rules Flow Chart

(Part 2 - see previous slide)



Audience Question

What types of tools and resources have you created for your staff to help them understand the work requirements policy?

Explaining Complex Policies to Clients

Work Requirement Notices

Consolidated Work Notice and Oral Explanation

- Must explain applicable work requirements for each household member, including ABAWD reporting requirements.
- Required at initial certification, recertification, and when a previously exempt household member or new household member becomes subject to a work requirement.

Notice of Adverse Action

- Required before disqualification, including for the ABAWD time limit.
- Must explain the action the household must take to end the ineligibility.

7 CFR 273.7(c)(1)(ii) and (iii), 273.13(a)(1) and (a)(2) and 273.11(c)(4)(ii)

Application and Report Forms

- State agencies may add voluntary questions to assist in screening.
- Eligibility workers should ask clear and effective questions.

Don't just ask: Are you homeless?

Also ask: Are you living in any of the following situations?

- A shelter
- A temporary location
- Staying with a friend or family

Don't just ask: Are you disabled?

Also ask: Do you have a condition that interferes with your ability to work?

- Physical condition
- Mental condition
- Not sure

Leveraging Partnerships

Audience Question

How many of our audience members are E&T providers?

Outreach & Client Communication

- State agencies should consider ways to help ensure SNAP participants and applicants are aware of the work requirements, especially the exemptions and exceptions.
- Examples include:
 - Collaborating with other agencies, community organizations, and advocacy groups.
 - Identifying trusted messengers for people experiencing homelessness, people aging out of foster care, and veterans.
 - Sharing information on websites, social media sites, mobile applications, and at local offices.

SNAP Outreach Activities

- SNAP outreach activities are a critical tool for:
 - Ensuring vulnerable populations are aware of the availability, eligibility requirements, application procedures, and benefits of SNAP.
 - Sharing how changes to the time limit and exceptions will impact certain populations.
- State agencies should provide plain language, client-friendly materials on the new FRA requirements and exceptions.

Existing Resources

- State agencies should also review existing resources that can help individuals maintain their SNAP eligibility, including:
 - SNAP Employment & Training;
 - Workforce Innovation and Opportunity Act Title I programs;
 - “More Than a Job” materials; and
 - One-pagers and informational pamphlets for partner organizations.

USDA and DOL Partner to Support ABAWDs as the PHE Ends and Best Practices and Resources for Informing Households of ABAWD Rules

Audience Question

What are some ways that you have leveraged partnerships within your State to serve time-limited participants? Do you have any best practices to share?

Resources

- 2023 SNAP ABAWD Policy Guide: <https://www.fns.usda.gov/snap/guide-serving-abawds-time-limit-participation>
- SNAP Work Rules Screening Checklist and Flow Chart: <https://www.fns.usda.gov/snap/work-rules-screening>
- Use of Information Received from Other Public Assistance Programs: <https://www.fns.usda.gov/snap/use-information-received-other-public>
- Additional Work Requirements Resources: <https://www.fns.usda.gov/snap/work-requirements/policies>

Questions?

Audience Question

How can FNS assist you in working together to serve time-limited participants?

Conclusion



We want to hear from you!

Provide feedback on this session by scanning the QR code and filling out the survey



QR: <https://www.surveymonkey.com/r/F6HFLHH>