

About work registration:

Work registration is a general requirement of all SNAP recipients age 16 and older. Work registration rules require that clients accept legitimate offers of work, do not quit or voluntarily reduce hours of work when working 30 or more hours per week, etc. Work registrants can be from 16-59, have children of their own, etc. ABAWD status applies to work registrants who are between 18-49, able bodied and without dependents. There are various exemptions from general work registration (disability, etc.) and if an individual is exempt from work registration, they will not be considered an ABAWD. An individual's work registration status is determined at the time of each interview with the client. Clients may also report changes in work registration status which would have to be verified. When clients sign an application, they are agreeing to be work registered.

ABAWD FAQ's

- 1) If anyone voluntarily reduces their hours to below 30/hours per week or voluntarily quits their job— do they **lose** their SNAP? (That might be a basic SNAP rule I was unaware of for all people)

This is a general rule for SNAP for anyone who is required to work register. A voluntary quit or reduction in hours results in a sanction to the client who quit a job of 30 hours or more, or reduced hours of work below 30, but the sanction does not apply to other members of the AG. A client who quits voluntarily is not eligible at all for varying amounts of time based on how many voluntary quits the client has had and when they get a job that is equal to or exceeds the previous employment.

In order for an ABAWD to meet the work requirements established for ABAWDs, they must work an average of 80 hours per month and must report if their employment goes below that. If an ABAWD was working less than 30 hours per week and voluntarily quit, they would not be subject to the voluntary quit sanction, but they would be considered "non-compliant" for each month they worked less than 80 hours per month UNLESS they were participating in another approved employment and training activity.

- 2) It says that anytime someone's hours drop below 20/week they are supposed to report it. Is that literally every month, if it dips below, you need to contact DFR? Or is it averaged over a longer period of time i.e. you re-certify every 6 months?

This is averaged monthly and needs to be reported as soon as it occurs.

- 3) If we had someone working for us that would be considered an ABAWD, if we had to cut their hours because of budget constraints (essentially partially lay them off) would they still be at risk of losing their SNAP if it exceeded the 3-month rule?

If the status persisted for 3 months and they did not participate in some other activity, they could lose their benefits. One of the ways to meet the work requirements is to participate in an approved employment and training activity. A client can also work (less than 80 hours per month) AND participate in an approved employment and training activity to equal 20 hours per week.

- 4) If that same ABAWD reduced their availability and it didn't meet our scheduling needs so we couldn't schedule them for more than 20 hours/week would they be at risk of losing SNAP (that one seems like a clearer yes to me, but I wanted to be sure)

Correct.

- 5) When does the clock start for a month? Is it the first full calendar month after the job loss/hours go below 20/week or is it literally the day they lose their job?

The client has to meet the qualifying activity for the entire month. A client who loses employment within the month will not result in 80 hours of employment and therefore will not have a "compliant" status for that month. A client who is losing their job or whose hours are being reduced through no fault of their own should contact DFR as soon as possible to get referred to our Employment and Training services.

- 6) What if you're only out of work/not participating in a workfare program for less than 30 days? Does that count as 1 month? Do those days count and then if you're out of work for another partial month do they get added together?

If a client does not meet the entire month's work requirements with work, employment and training programming, a combination of work and employment and training programming, or workfare (Community Work Experience) they are considered "non-compliant" for the month. A client can have 3 months of non-compliance before having their SNAP benefits discontinued.

- 7) Is participation in ANY job training/job search assistance program an option or does it have to be something like IMPACT that the state runs?

The state can deem non-state run job training/job search program acceptable. Various programs can be considered an approved employment and training program. The program hours must equal at least 20 hours per week (unless the client is working in conjunction with the training and hours from both equal at least 20 per week). An approved employment and training program would be one that would be expected to lead to employment upon completion of the program.

- 8) Is Indiana using a fixed clock or a rolling clock to measure the 36-month period?

The fixed clock begins July 1, 2015 and will end June 30, 2018.

- 9) If an ABAWD voluntarily quit a job and was out of work for several months & chose not to participate in E&T activities, but then started a new job that was 20+ hours, but the pay was still below the SNAP income cutoff, how soon would they be able to re-apply for SNAP? As soon as they got their new hire letter? After they had worked 80 hours for the month? Somewhere in between?

After they had worked 80+ hours in a 30 day period they would become eligible for benefits on the following month. The client would have to show that they have worked the 80 hours within a 30 day period before they would be eligible again.

- 10) If an ABAWD was living in a home with an unrelated-family (i.e. renting a room in the basement, while the parent & child lived upstairs), is that person still considered an ABAWD or are they exempt because there is a child living in the home?

That person would only be exempt if they were in the same assistance group as the child. If they are not in the same assistance group (they get their benefits separately from a child in the house hold) they would not be exempt.

- 11) We have a staff member here with chronic disease who receives a disability payment. In order to maintain her disability, she is not able to earn more than \$X dollars during a month. Her disability eligibility is not limited to working a set number of hours – its about how much she earns. When we first hired her, I suspect she was working 25-30/hours a week and staying under her earning limit. Now that she has worked here several years and has been promoted with some wage increases over time, I think she is down to just under 20 hours/week. If she was receiving SNAP and was working under 20hours to maintain her disability eligibility, is she exempt or does she need to be doing E&T activities during the month to remain compliant. In this case, she would not be considered medically unfit for work, she just can't earn too much.

If she has a medical condition she would likely be exempt from ABAWD or SNAP work requirements. "Able bodied" is a pre-requisite for ABAWD status.

- 12) If an ABAWD voluntarily reduced their hours to less than 20/week because they needed to spend time caring for an elderly parent or sick spouse, assuming that went beyond the 3 month allowance, would they potentially lose their SNAP? Or is there any type of waiver or affidavit they can complete to explain why they reduced their hours.

There is a separate SNAP exemption for needed to care for a disabled individual in the house hold. Keep in mind that ABAWD status assumes there are NO other reasons which a client may be exempt from SNAP work registration. Reasons for exemption from general work registration can be found here

http://www.in.gov/fssa/files/ICES_Program_Policy_Manual.pdf

- 13) If there is a married couple with no children and the husband works but they are still income eligible, is the wife required to meet the E & T requirements?

Yes, ABAWD requirements are on an individual basis, not an assistance group basis.

- 14) What about seasonal workers, for example a school bus driver? Would the bus driver be required to meet E & T requirements in the summer?

Yes, any time they are below 20 hours/week average monthly employment they would be required to attend E&T.

- 15) When a student is doing an un-paid internship, does it count? (I am thinking yes but what kind of paperwork and who approves it)

Also, what does the agency that is housing the internship have to do as far as providing documentation and to whom?

For example, documentation provided by agency to the DFR, or does it go through the school?

- **If a student was doing an unpaid internship instead of working, they would likely be ineligible for SNAP based on student status.**
- **An unpaid internship is not likely to meet the requirements for ABAWD unless it is intended to result in employment upon successful completion of the internship. Employment and Training are the two components of qualified activities.**
- **If they meet the conditions in policy 2438.15.05.55 regarding employment under contract they would be coded as employed at 30 hours per week and therefore exempt from work registration.**