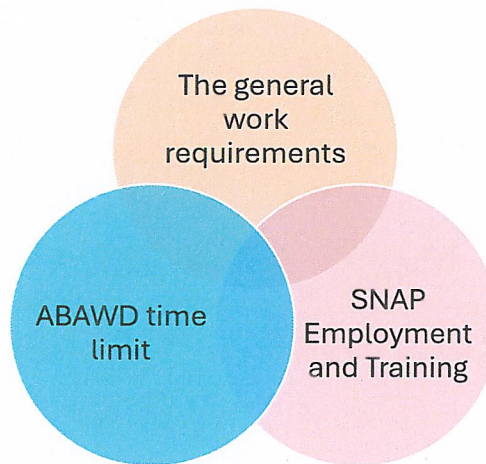


## SNAP Work Requirements, SNAP Employment & Training, and Act 974 of 2019

SNAP work requirements are best understood as three distinct, but interrelated and mutually supportive areas:

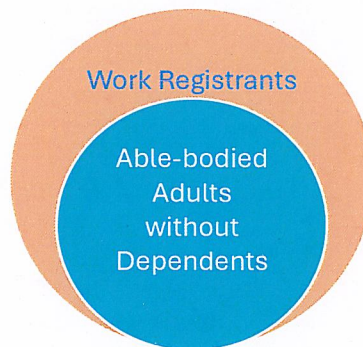


SNAP general work requirements:

- Apply to recipients ages 16 through 59\*.
- Those subject to the general work requirements must:
  - Register for work
  - Take a suitable job if offered
  - Participate in SNAP Employment and Training or a workfare program if assigned by the state agency
- Are prohibited from voluntarily quitting a job of 30 or more hours per week or reducing work hours to less than 30 hours per week without good cause\*\*

ABAWD time limit for work requirements:

- Able-bodied adults without dependents (ABAWDs) are a subset of the work registrants who have additional work rules to follow beyond general work requirements.
  - Apply to recipients ages 18 through 54\*\*\*
  - Must meet both the general work requirements and adhere to the ABAWD work requirement/time limit (3 months in a 36-month period)



Discontinuances in the last 12 months (10/1/2023-11/1/2024) for ABAWDs failing to meet the 3 months in a 36-month period:

Ineligibility Month	Clients
10/1/2023	359
11/1/2023	435
12/1/2023	186
1/1/2024	181
2/1/2024	619
3/1/2024	227
4/1/2024	330
5/1/2024	397
6/1/2024	359
7/1/2024	348
8/1/2024	377
9/1/2024	365
10/1/2024	270
11/1/2024	454
<b>Grand Total</b>	<b>4907</b>

SNAP Employment and Training satisfies the work activity requirement for ABAWDs but is not the only qualifying activity. Participation in other work activities/programs satisfies these requirements as well. All qualifying activities include:

- Working at least 80 hours a month.
- Participating in a work program at least 80 hours a month. A work program could be:
  - SNAP Employment and Training
  - Another federal, state, or local work program (WIOA, Goodwill, etc.)
- Participating in a combination of work and work program hours for a total of at least 80 hours a month;
- Participating in workfare\*\*\*\* for the number of hours assigned to you each month (the number of hours will depend on the amount of your SNAP benefit.)

The State has the option to offer E&T on a voluntary basis to certain or all SNAP participants (voluntary E&T); or the State can require all or certain work registrants to participate in E&T as a condition of eligibility (mandatory E&T).

Currently the state of SNAP E&T is voluntary, but DCO has been working to expand providers to meet the requirements established by Act 974. In Arkansas, SNAP E&T is:

- Serving SNAP recipients with a general work requirement on a voluntary basis in all 75 counties (36 counties have no physical provider location, but offer virtual services through Adult Education)
- Operated by five third-party providers
- Automatically referring all ABAWDs who are not fulfilling the ABAWD work requirement to E&T programs

Individuals who do not participate in the voluntary SNAP E&T program are not sanctioned, but if an ABAWD is not fulfilling the ABAWD time limit through other means, they will receive a countable month and are disqualified from receiving benefits for not meeting the general work requirements for 3 months in a 36-month period

DHS served 2561 participants in some capacity through SNAP E&T during Federal Fiscal Year 2024. In addition, DHS issued 20,519 referrals to SNAP E&T during Federal Fiscal Year 2024.

DHS understands that the intent of the General Assembly in passing Act 974 was to increase employment and self-sufficiency among able-bodied adults who are receiving SNAP benefits.

Those subject to Mandatory SNAP E&T under Act 974 would include all non-ABAWD work registrants and those meeting certain exemptions from the general work requirements.

- Age 55 through 59 with no dependents
- Age 18 through 59 who:
  - Have dependents age 6 through 17,
  - Have no documented physical or mental barrier to work,
  - Are receiving or have applied for unemployment benefits,
  - Are more than half-time students,
  - Are meeting the work rules for TANF, or
  - Are participants in drug addiction or alcohol treatment and rehabilitation program.

The General Assembly could retain work requirements for the broader group of SNAP recipients without requiring implementation of Mandatory SNAP E&T.

Agency responsibilities under a mandatory program:

1. Ensure that individuals have been properly screened for an exemption,
2. Ensure there is an appropriate and available opening in an E&T program,
  - If there is not an appropriate and available opening, the State must award good cause.
3. Must exempt individuals if the costs of participant reimbursements exceed the State agency cap (\$900 per FFY), or if the reimbursement is not available,
4. All participants must receive the consolidated work notice and oral explanation of all applicable work requirements as applicable,
5. Must establish if any non-compliance was without good cause and issue Notice of Adverse Action if applicable.

As of October 2024, Arkansas is providing SNAP benefits to approximately 10,480 able-bodied adults without dependents (SNAP ABAWD definition). This includes individuals ages 18-54 who are physically and mentally fit, have no children in the household, are unemployed or employed less than 30 hrs per week. This represents 4.3% of the total SNAP enrollees.

<b>Mandatory SNAP E&amp;T Program</b>	<b>Voluntary SNAP E&amp;T Program</b>
State is responsible for providing program	Individual is responsible for finding qualifying activity
Requires excessive communication/notices from the state	No communication required beyond informing participant of requirements to meet general work requirements
Harder to discontinue benefits, as notices must be issued at certain intervals and the	Benefits are discontinued once participant has not met requirements for 3 months in a 36-month period

individuals must be given time to “cure” the missed requirement	
Lack of state E&T program availability = exemption for participant	No exemption because individual is responsible for finding qualifying activity

\*Exceptions to general work requirements:

1. Physically or mentally unfit for employment
2. Care for a child under age 6 or an incapacitated person
3. Employed 30 hours or more per week or earning weekly wages at least equal to the federal minimum wage multiplied by 30 hours
4. Regularly participating in a drug addiction or alcoholic treatment and rehabilitation program
5. Participating in and complying with the work requirements under title IV of the Social Security Act (TANF) or the Federal-State unemployment compensation system
6. A student enrolled at least half-time

\*\*Good cause includes circumstances beyond the household member’s control, such as, but not limited to:

1. Illness, household member illness requiring the presence of the member.
2. Household emergency.
3. The unavailability of transportation.

The individual is considered to have met the work requirement if the circumstance is temporary and they intend to return to work, including lack of transportation. Good cause is determined by each local office on a case-by-case basis.

\*\*\*Exceptions to ABAWD work requirements:

1. Already exempt from the general work requirements
2. Medically certified as physically or mentally unfit for employment
3. Sharing a household with a child under age 18
4. Pregnant
5. Homeless\*
6. A veteran\*
7. Under age 24 and in foster care at age 18\*

\*\*\*\*A workfare program is a government program that requires welfare recipients to work for the government in exchange for their benefits. The goal of workfare programs is to help people become self-sufficient and reduce the burden on taxpayers. Recipients may be required to work at a community center or government office for a set number of hours each week.