

Service Blueprint: SNAP Work Requirements (1/6)

Apply

Client applies for SNAP

CLIENT ACTION

Not all states’ applications include questions that surface exemptions

PAIN POINT

The minimum SNAP application is name, address, and signature. Questions that would indicate possible exemptions may not be included, or the client may not complete them.

Online applications tend to include more questions than paper applications.

Improve application questions to better screen for work requirements exemptions and compliance

OPPORTUNITY

Consider the placement of questions within the flow of the form, and provide framing to explain why sensitive questions are being asked

All SNAP applicants must “Register for work”

POLICY

See federal regulations at [7 CFR 273.7\(a\)\(1\)\(i\)](#).

States should integrate work registration as part of the SNAP application and renewal form, rather than requiring a separate form or process.

BEST PRACTICE

Most states do this, though not all.

This could look like a checkbox near the end of the form, or it may be included as a condition of the client’s signature with submission.

Figure out if the client is exempt from work requirements

Process initial application

Staff register the application, and need to check if the client already exists in their system

STAFF ACTION

If the applicant received SNAP before, staff might check if the client was previously exempt or subject to work requirements.

STAFF ACTION

Exemption reasons from previous certification periods might continue to apply

Age and household member exemptions are more durable and can often be assessed just from the application.

BEST PRACTICE

Clients are exempt if they are:

- 18 or younger or 65 or older
- Living in a household with someone 13 or younger

Staff may check databases for information that can demonstrate exemptions or compliance.

STAFF ACTION

Different states and individual caseworkers check databases at different points:

- In some states, databases are checked when applications are registered.
- Often databases are checked during the interview.

Databases can reveal that a client is working enough hours, earning income, or other reasons that would make them exempt from general work requirements.

BEST PRACTICE

Clients are exempt if they are:

- Working 30+ hrs or earning \$217.50/week
- Receiving/applied for Unemployment Insurance (UI)

Improve use of income verification services so that income and work hour exemptions can be found automatically

OPPORTUNITY

The Work Number (TWN) is commonly used but expensive and often requires manual effort to check and input data. Alternatives are trying to break into the market.

Integrate data sources to identify other exemptions

OPPORTUNITY

[View a list of potential sources](#)

Complete interview (1/2)

Client completes their required interview

CLIENT ACTION

How this is done varies:

- Some states offer interviews on the phone, others require an in-person office visit
- Some states schedule a specific time, others allow clients to call-in “on demand”

Interview completion is a known challenge for benefits access

PAIN POINT

Some known issues include:

- Client may learn about a scheduled interview too late, or not at all, especially if notice is only through mail
- Client may miss the call, or have to wait on the phone for a long time

Offer an exemption screener so that clients know if they might have qualifying exemptions that they should bring up in their interview

OPPORTUNITY

Guidelines around who is subject to work requirements change. It’s hard for staff to keep track of the different layers of how work requirements apply.

PAIN POINT

Staff must also use the interview time to follow-up on incomplete or vague information from applications.

Staff conduct the interview and mark information in the eligibility system and in their case notes

STAFF ACTION

All exemptions should be documented, because some are temporary so if one exemption category ends another can kick in.

BEST PRACTICE

States will document exemptions but only apply one, ideally prioritized by which exemption will last the longest if there are multiple.

Clients can be exempt if they are deemed “unfit for work.” Staff have some leeway to interpret that definition.

POLICY

This must be “obvious to the eligibility worker” or based on statement by a medical professional. If unfitness is obvious to a worker, statement from a medical professional is not required.

Agencies should train and support staff to accurately identify if a client is “unfit for work” during the interview.

BEST PRACTICE

Reasons like mental health needs, injuries, or lack of access to a shower can classify someone as “unfit for work.”

States shared that this involves 1) thoughtful wording of probing questions, and 2) can be easier if the interview is in person (ie: you can see a broken limb).

Develop resources for supporting caseworkers in exemption screening during the interview

OPPORTUNITY

Ideas include:

- **Interactive interview guides:** Some states have versions of this already, where the eligibility system checks for exemptions based on data entered and provides prompting questions for the interview
- **Innovative training:** including practice scenarios and roleplay

Service Blueprint: SNAP Work Requirements (2/6)

Figure out if the client is **exempt**, and, **if they’re not**, if they are **meeting work requirements**

Complete interview (2/2)

At the end of the interview, the client receives information about next steps

CLIENT ACTION

Often times clients need to submit additional verifications.

Staff may call “collateral contacts” to get more information about the client’s situation

STAFF ACTION

Commonly this involves calling the client’s employer to verify the client’s wages and hours

Clients could be referred to Employment & Training (E&T) services

CLIENT ACTION

How this is done varies: some may refer after the interview, others wait to refer a client when their eligibility for SNAP is determined

During the interview, staff should inform clients verbally of their responsibility to report certain changes plus how to maintain eligibility

STAFF ACTION

How this is done varies:

- Some may play a “Rights & Responsibilities” recording
- Some may not consistently include this information
- Staff may have a customized script to read based on the work requirements an individual is subject to

Get and submit verification documents

If needed, staff will request verifications

STAFF ACTION

This FNS resource FNS outlines what qualifies as mandatory acceptable verification and state options.

If a client is thought to be “unfit for work,” the caseworker may request specific supplemental verification (i.e., note signed from a social worker).

Not all exemptions require a verification

POLICY

The state agency is not required to verify an exemption or exception unless it determines the information is questionable or otherwise required by program rules (e.g. disability status).

The following exemptions don’t require verification submission:

- Age (determined by birth date)
- Pregnancy
- Receiving Unemployment Insurance (determined by data match in state’s UI system)
- Presence in the household with someone under 14

Client gets notice of verifications requested

CLIENT ACTION

Client submits verification to the SNAP agency

CLIENT ACTION

States must accept paper copies of verifications, and may optionally accept documents online or faxed.

Verification submission is a known challenge for benefits access

PAIN POINT

Some known issues include:

- The notice may be unclear, or the client doesn’t get the notice
- Clients may submit verification insufficient to prove exemption or work status
- The way that clients can submit verification may not be very usable
- Clients working in informal or gig economy jobs may have limited documentation of work

Ease document submission

OPPORTUNITY

Ideas include:

- Chatbots or checklists to ensure clients are providing the correct documents
- Functionality so clients can take a photo with their phone to submit documents

Connect verification documents with relevant SNAP case

SYSTEM

Process could be manual or automated, depending on SNAP system design

Staff process verifications submitted by the client

STAFF ACTION

If needed, request additional verifications or clarify if a verification was insufficient

Automate parts of document validation

OPPORTUNITY

Ideas include tools that:

- Screen for common errors with document uploads
- Validate documents being uploaded
- Extract data, such as for tagging document types or entering data into eligibility systems that caseworkers can easily review

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Last updated: Sept. 10, 2025

Service Blueprint: SNAP Work Requirements (3/6)

Determine eligibility, and if and how work requirements apply



Service Blueprint: SNAP Work Requirements (5/6)

Maintain benefits

If a client has work requirements and is **meeting** them

Clients who have to meet work requirements must “work” for at least 80 hours each month to avoid having a time limit for getting SNAP benefits.

 POLICY

“Work” can be any of the following:

- Work for pay, for goods or services (for something other than money), unpaid, or as a volunteer
- Participation in a work program (like SNAP Employment & Training) at least 80 hours a month
- Participation 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.)
- A combination of these programs or activities

It can be challenging for clients to track hours, especially if they are doing multiple activities to meet the 80-hour total.

 PAIN POINT

Client might be attending Employment & Training (E&T) activities in order to meet the hourly minimum

 CLIENT ACTION

E&T makes it easier to report client’s hours each month to eligibility staff (see “Referral to E&T...” section)

Clients who have to meet work requirements must report whenever their work hours fall below 80 hours a month.

 POLICY

Though a client is required to report when their hours fall below 80 in a given month, agencies cannot require clients to report hours every month.

Client should notify the agency if their work hours drop below 80 hours a month

 CLIENT ACTION

Client can claim “good cause” for why they could not meet the 80 hours (see “If a client has work requirements and is not meeting them”)

Clients may not be counting their hours nor reporting when their hours drop below 80 hours a month, which can lead to a payment error for the state.

 PAIN POINT

Clients should report when their hours drop below 80 each month it occurs, but usually a change in hours is uncovered through E&T, or when the client has to renew or submit an interim report.

Eligibility staff process the change, mark the client as no longer meeting the work requirement

 STAFF ACTION

If a client has work requirements and is **not meeting** them

If a client has work requirements and isn’t meeting them, they can only be on SNAP for 3 months every 36 months.

 POLICY

Each month that a client is not meeting work requirements will “count” towards the 3-month limit.

A client can claim “good cause” for not being able to meet work requirements that month to prevent having to use one of their 3 countable months.

 POLICY

The client would have to know that this is possible, and how to report this.

In order to meet work requirements, the client must work, volunteer, or complete qualifying training activities for at least 80 hours each month.

 CLIENT ACTION

In some eligibility systems, benefits will be terminated automatically after 3 countable months have been meet.

 SYSTEM

This is based on timers states have built into their eligibility system, and are not affected by the state’s decision on certification period

Clients often first find out they have used up their countable months when their EBT card hasn’t reloaded

 PAIN POINT

Text or reach out to clients to let them know when they have used a countable month and provide guidance on reporting “good cause”

 OPPORTUNITY

Some states text clients after they have used more than one countable month. One state has a full-time staff member who calls every client who has used a countable month to see if they might have good cause.

Client reports challenges and emergencies that are “good cause” for not being able to meet work requirements that month

 CLIENT ACTION

Such as medical issues, family emergencies, their car broke down, caregiving needs, etc.

A client would have to know to report this, and usually it gets reported either through E&T staff or the client calling or walking into an eligibility office

Clients often don’t know that they could report “good cause”

 PAIN POINT

“Good cause” reasons often get reported through clients describing their situation to their E&T worker, or after losing benefits.

“Good cause” can be retroactively applied if later discovered.

 SYSTEM

This would reduce a client’s number of countable months used

Service Blueprint: SNAP Work Requirements (6/6)

Renew benefits

All clients

Typically clients have to complete recertification forms every 12 months and interim report forms every 6 months after certifying.

CLIENT ACTION

In states where Able Bodied Adults Without Dependents (ABAWDs) have a 4-month certification period, a client must go through renewal processes every 4 months.

CLIENT ACTION

The client would have to submit renewal forms and may be asked to complete an interview, though interviews are only required every 12 months.

Staff processes renewal forms and interim report forms

STAFF ACTION

Data sources can help discover if a client becomes eligible for an exemption, or has continued to meet work requirements.

OPPORTUNITY

[View a list of potential sources](#)

Clients should report any changes that could impact their eligibility or make them not exempt from work requirements anymore.

CLIENT ACTION

Clients often don’t know what to report, or forget to report changes in a timely manner.

PAIN POINT

Changes are often found through recertification or interim report forms

Make it easier for clients to report changes.

OPPORTUNITY

This includes making it clearer for clients to know when to report changes

Staff processes change report and re-runs eligibility determination

STAFF ACTION

Sometimes the client has to submit verification for the change reported (i.e., for a job change).

Staff may not have the bandwidth to process the changes in a timely manner.

PAIN POINT

Change reports should be processed within 30 days, but all change reports end up in the same queue as other work and often do not get addressed quickly.

Prioritize within change reports to process more urgent changes sooner

OPPORTUNITY

Consider automation for low-risk change reports that don’t impact eligibility

Regaining benefits

States have the option of how they want to implement the 36-month clock for clients who aren’t meeting work requirements.

POLICY

The three options are:

- Universal Fixed Clock
- Individual Fixed Clock
- Rolling Clock

A Universal Fixed Clock to count the 36 months reduces the most burden on staff and provides the most flexibility for clients.

BEST PRACTICE

This means the 36 months is counted from the the same start and stop date for all participants, regardless of when they start receiving SNAP benefits

Clients aren’t aware of when their 36 months have transpired and that they could re-apply.

PAIN POINT

States often do not contact clients when their 36 months have passed and they could re-apply for SNAP benefits again.

Client re-applies for SNAP

CLIENT ACTION

Client has to be compliant with work rules for 30 consecutive days or must become exempt in order to regain eligibility

POLICY

[See the Code of Regulations for more details.](#)

Staff process the application

WORKER ACTION

Eligibility system may automatically flag that this individual has exhausted their countable months already

SYSTEM

Based on previous records

Staff may have to manually override the eligibility system’s defaults if a client had previously exhausted their 3 countable months in the previous 36-month cycle.

PAIN POINT

If a client with work requirements is found re-eligible, they have up to 3 countable months of SNAP benefits, but they must be used consecutively.

POLICY

If a client stops meeting the work requirement again, they are entitled to an additional set of three countable months. However, these three additional months have strict limitations. They always run consecutively, meaning they cannot be used piecemeal or saved for the future.

Also, they may only be received/ used once in the 36-month period, even though there is no limit on how many times a time-limited participant could regain eligibility by again meeting the ABAWD work requirement and continuing to meet it on an ongoing basis.